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Phoenix House
Phoenix Lane
Tiverton
Devon
EX16 6PP
www.middevon.gov.uk

Contact: **Andrew Seaman**
Email: **aseaman@middevon.gov.uk**

All Members

16 February 2023

Dear Member,

Council – 22 February 2023

Please find enclosed reports - that had been previously circulated - as appendices to the recommendations that were published under items 9 and 10.

Sincerely
Andrew Seaman
Member Services Manager

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CABINET
3rd January 2023

Tax Base Calculation 2023/24

Cabinet Member: **Cllr Bob Deed Cabinet Member for Finance**

Responsible Officer: **Andrew Jarrett s151 & Deputy CEO**

Reason for Report: This paper details the statutory calculations necessary to determine the Tax Base for the Council Tax. The calculations made follow a formula laid down in Regulations.

RECOMMENDATIONS: **To Council**

1. That the calculation of the Council's Tax Base for 2023/24 be approved in accordance with The Local Authorities (Calculation of Tax Base) (England) Regulations 2012 at **29,832.98** an increase of circa 21.57 Band D equivalent properties from the previous financial year.

2. That the current collection rate of 97.5% be decreased to 96.5% detailed in paragraph 2.

3. That the doubling of the second home Council Tax charge from 01/04/2024 is adopted. Details at 3..7.2

4. That the premium Council Tax charge on long term empty properties is billed after 12 months from 01/04/2024. Details at 3.8.2.

Relationship to Corporate Plan:
This report sets out how the Tax Base is calculated for 2023/24. This calculation is then used as a basis to set the Council's budget for the forthcoming year in line with the Council's Corporate Plan objectives.

Financial Implications: Mid Devon District Council is a Statutory Billing Authority and must set its Council tax each year. If it were not to set a Council Tax then the Authority and all Precepting authorities would be unable to raise money to pay for all the services they provide.

Legal Implications: This is a statutory function and is a legal requirement. The Council must now set its budget annually using Council Tax information as at 30th November each year in accordance with The Local Authorities(Calculation of Council Tax Base)(England) Regulations 2012 calculating the relevant amount by applying the formula set out in the above regulations.

Risk Assessment: If the Council fails to carry this duty out then the Council Tax cannot legally be set. In accordance with the LGF Act 2012 above and SI 2914 of 2012 The Local Authorities(Calculation of Council Tax Base)(England) Regulations 2012, The Council Tax Base calculation includes a deduction for the Council Tax Reduction scheme within its Tax Base calculation.

1.0 **Introduction**

1.1 Every year each billing authority is required to calculate and approve its Band 'D' Equivalent Council Tax base. For 2023/24 this technical calculation is as follows:

2.0 **The Collection Rate calculation (A)**

2.1 It is necessary to estimate a 'collection rate', which is the proportion of Council Tax due that will actually be paid. It is recommended that a collection rate of 96.5% be estimated for the year 2023/24, which is a decrease on previous year's collection rate to reflect the risks associated with the current Cost of Living Crisis.

2.2 Any variation from the collection rate of 96.5% is pooled in a collection fund, which is distributed in the next financial year to all precepting authorities.

3.0 **Calculation of the relevant amount (B)**

Number of Properties per Valuation Band

3.1 The starting point will be the total number of properties within Mid Devon set out in the Valuation List.

Less Exemptions

3.2 Properties are exempt from Council Tax under certain circumstances. The calculated tax base uses the information currently held in deciding the level of exempt properties that are likely to apply for 2023/24.

Add Appeals, new properties and deletions from the Valuation List

3.3 The Valuation Officer has dealt with the vast majority of Council Tax appeals to date and so no further allowance is believed to be necessary at this time. At the **13 October 2022** we have estimated a net increase in properties within Mid Devon of **103** properties to go live on or before 1st April 2023 and a further **529.25** properties during the financial year, totalling **632.25**. This estimate is based on the current number of reports outstanding with the Valuation Officer.

Disabled Allowance (move down a Band)

3.4 Where a disabled resident has made structural alterations to their property to help with their disability or they use a wheelchair internally at the premises, the property is entitled to a reduction and is afforded by moving the property to the next lowest band. Existing Band A properties are also entitled to a reduction by reducing the 6/9ths charge down to 5/9ths Charge.

Less 25% Discounts

Single Persons Discounts

3.5 If only one (adult) person lives in the dwelling as their "sole & main residence" then a discount of 25% is allowed.

Less 50% discount

3.6 A discount of 50% is allowed where two or more persons who can be disregarded for Council Tax purposes occupy the property, e.g. care workers.

Second homes

3.7 Second Homes now pay full Council tax.

3.7.2 The Leveling up and Regeneration Bill is currently waiting for Royal Assent, once passed it will allow Billing Authorities to charge a premium of up to 100% on second homes so the Charge Payer will have to pay 200% of the Council Tax Charge with effect from the 1st April 2024. If approved an advert will need to be put in the public domain to comply with the terms of the bill. Regulations require a Billing Authority to give 12 months' notice.

3.7.3 Below is a table of the current second homes income with a 5% increase (in line with a normal yearly percentage increase) and the appropriate premium applied:

BAND	2022 /23	5%	100% premium
A	£36,486.23	£1,824.31	£76,621.08
B	£64,368.04	£3,218.40	£135,172.88
C	£75,481.24	£3,774.06	£158,510.60
D	£64,866.95	£3,243.35	£136,220.60
E	£60,931.04	£3,046.55	£127,955.18
F	£59,392.17	£2,969.61	£124,723.56
G	£47,150.04	£2,357.50	£99,015.08
H	£8,659.70	£432.99	£18,185.37
Total	**£417,335.41**	**£20,866.77**	**£876,404.36**

Long Term Empties

3.8 After a three month free period no further discount is allowed.

3.8.1 However, if a property remains empty of furniture and residents for two years or more, the Council is allowed to apply an additional 100% premium to the Council tax charge, so the Charge payer will have to pay 200% of the Council Tax charge in that area. With effect from the 1st April 2020 a premium of 200% can be levied so the Charge payer will have to pay 300% of the Council Tax in that area after a period of five years and with effect from the 1st April 2021 a premium of 300% can be levied so the Charge payer will have to pay 400% of the Council Tax in that area. The Regulations detailing the additional premium are Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018.

With effect from the 1st April 2019 100% premium after 2 years
With effect from the 1st April 2020 200% premium after 5 years
With effect from the 1st April 2021 300% premium after 10 years

3.8.2 The Bill extends the current Empty Home Premium to properties empty of furniture and residents for twelve months to 100% so the Charge Payer will have to pay 200% of the Council Tax Charge with effect from the 1st April 2024. If approved an advert will need to be put in the public domain to comply with the terms of the bill.

3.8.3 The table below of shows properties that are currently empty of furniture and residents and have been for nine months with a 5% increase (in line with a normal yearly percentage increase) with the premium applied, based on our current empty property information.

BAND	2022 /23 average	5%	100% premium	Approximate premium properties	charge
A	£1,459.45	£72.97	£3,064.84	100	£306,464.33
B	£1,693.90	£84.69	£3557.18	70	£249,022.8
C	£1,935.42	£96.77	£4064.37	40	£162,574.98
D	£2,162.23	£108.11	£4,540.69	30	£136,220.60
E	£2,649.18	£132.46	£5,563.27	15	£83,449.03
F	£3,125.90	£156.30	£6,564.40	7	£45,950.78
G	£3,626.93	£181.35	£7,616.54	3	£22,849.63
H	£4,329.85	£216.49	£9,092.69	0	0
Total	**£20,982.85**	**£1,049.14**	**£44,063.98**	**265**	**£1,006,532.04**

4.0 Estimated cost of the Council Tax Reduction Scheme (CTR)

4.1 Before we convert the properties to Net Band D equivalents we must reduce the total properties by the estimated cost of the Council Tax Reduction (CTR) Scheme

4.2 The criteria for the CTR scheme is that those claimant's in the lowest income band do not have to pay anything; thereafter the percentage payable ranges from 35 to 75% on the charge (with the exception of those protected by legislation namely pensioners in receipt of guaranteed pension credit).

4.3 The main criteria of the scheme are:

- Support is increased up to 100% i.e. those claimants who are least able to pay due to the current financial crisis.
- Support is limited to Band D charges so claimants in a higher banded property will receive CTR up to 100% of a band D and be required to pay the balance of the additional banding in full.
- Savings limited to £6,000.
- Changes were made to the CTRS in April 2017 to align it with Universal Credit.

4.4 For your information Mid Devon's CTR scheme for 2023/24, is estimated to cost in the region of **£4,512m,** based on the scheme criteria.

4.5 CTR has been included within the tax base calculation and applied to each band and parish individually then a band D equivalent calculation has been used to arrive at a final figure.

4.6 The cost of the CTR scheme must be reflected in the Tax Base calculation so the following calculation is carried out for each valuation band to arrive at the net chargeable Dwellings:

Calculation of the Relevant Amount

	2022/23	**2023/24**
Number of properties per valuation list	37,291.00	37,519.00
Exemptions	-516.00	-605.00
Single occupiers and 25% disregards	-3,055.00	-3,043.75
50% discount	-27.00	-34.00
100% exempt 3 months only	-36.00	-47.00
Additional LTE at 100%	+58.75	+90.00
Additional LTE at 200%	+100.00	+60.00
Additional LTE at 300%	+135.00	+51.00
Additional net new properties	+379.00	+632.25
Class D 50% loss	-21.00	-15.50
Annexes (new)	-32.00	-24.00
Chargeable dwellings before conversion to Band D equivalent	**34,276.75**	**34,583.00**

Conversion to Band D equivalents

4.7 The net chargeable dwellings are then converted to Band D equivalents. This is carried out by multiplying the Net chargeable dwellings by the appropriate factor (A=6, B=7, C=8, D=9, E=11, F=13, G=15, H=18) for the band and dividing by that for Band D (9). The Table below details the Net Chargeable Dwellings converted to Band D equivalents.

4.8 The calculation shows the estimated annual cost of the CTR scheme, shown as the number of Band D equivalents. For the 2023/24 year this is estimated as 2,009.34 Band D equivalent properties.

4.9 The Tax Base is finally calculated by applying the collection rate to the total Band D equivalents when summarised below for the 2023/24 financial year.

4.10 An @ band dwelling is a band A property with a disabled banding reduction applied:

Band	Chargeable dwellings	Multiplier	Band D equivalent properties	Less CTR properties	Revised properties
	@9.75	5/9	@5.43	-3.26	2.17
A	5,389.50	6/9	3,593.02	-793.95	2,799.07
B	8,333.25	7/9	6,481.43	-627.74	5,853.69
C	6,712.25	8/9	5,966.44	-309.16	5,657.28
D	6,183.50	9/9	6,183.50	-154.89	6,028.61
E	4,608.00	11/9	5,632.03	-76.36	5,555.67
F	2,398.50	13/9	3,464.55	-33.15	3,431.40
G	895.75	15/9	1,492.95	-9.74	1,483.21
H	52.50	18/9	105.00	-1.08	103.92
	34,583.00		**32,924.35**	**-2,009.34**	**30,915.01**

4.11 To clarify the table detailing the **Calculation of the Relevant Amount** is based on actual properties and the final calculation above is based on a Band D equivalent of actual properties.

4.12 Therefore, based on the above detailed calculations in accordance with SI 2914 of 2012 the Tax Base is to be calculated as: Total relevant amounts (A) **30,915.01** multiplied by the estimated collection rate (B) (96.5%)

4.13 Mid Devon District Council's Council Tax Base for 2023/24 will be **29,832.98.**

Contact for more information: Fiona Keyes 01884 234329 / fkeyes@middevon.gov.uk

Background Papers: CTB1 and supporting documentation

File Reference: FW/G/CTB1

Circulation of Report: Cabinet Member for Finance, Leadership Team

Cabinet
07 February 2023

2023/24 Budget

Cabinet Member: Cllr Bob Deed, Leader and Cabinet Member for Finance
Responsible Officer: Andrew Jarrett, Deputy Chief Executive (S151)

Reason for Report: This report provides the proposed budgets for the General Fund and the Housing Revenue Account for the year 2023/24 and recommends the Band D Council Tax charge for 2023/24.

RECOMMENDATIONS:

Cabinet are asked to recommend to Council the following:

1. **A Council Tax Requirement of £6,724,350 calculated using a Council Tax of £225.40 for a Band D property, an increase of £6.56 or 2.99% from 2022/23 and a Tax Base of 29,832.98, in accordance with the Local Authorities (Calculation of Tax Base) Regulation 1992, as amended, after the relevant adjustments in respect of the Council tax support scheme approved by Cabinet on 3 January 2023;**
2. **The overall budgeted Cost of Services within the General Fund of £16,720,364 for 2023/24 is approved as detailed across Appendices 1 – 2 and inclusive of the adjustments included within Table 1 in paragraph 5.1;**
3. **The 2023/24 budget requires no transfer from the General Fund Balance and a further temporary transfer of £57,657 from the New Homes Bonus EMR in order to balance and agree all of the transfers to and from Earmarked Reserves as detailed in Appendix 3;**
4. **HRA budget for 2023/24 be approved – Appendix 4;**
5. **HRA fees/charges are approved based on the attached Appendix 5;**
6. **Work on strategic planning for delivering a balanced budget for 2024/25 is commenced immediately.**

Relationship to Corporate Plan: This budget delivers the Corporate Plan priorities within existing financial resources.

Financial Implications: This is a financial report and the implications are contained within it. This report proposes a balanced GF and HRA budget for 2023/24 without materially reducing service delivery.

Legal Implications: None directly arising from this report, although there is a legal obligation to balance the budget. There are legal implications arising from any future consequential decisions to change service provision, but these would be assessed at the time.

Risk Assessment: In order to comply with the requirement to set a balanced budget, management must ensure that the proposed savings are robust and achievable. We must also ensure that the assumptions we have used are realistic and prudent. Failure to set a robust deliverable budget puts the Council at risk of not being able to meet its commitments and casts doubt on its “going concern” and “Value for Money” status.

Equality Impact Assessment: There are no Equalities Impact implications relating to the content of this report. All Policy Development Group meetings have considered and

made decisions based on summary feedback from the recently completed resident's survey.

Climate Change Assessment: The General Fund, Capital Programme and the Housing Revenue Account all contain significant investment in order to work towards the Council's Carbon Reduction Pledge.

1 Introduction

1.1. The balancing of the Council's budget continues to be a challenge year-on-year following the Government's austerity measures and the subsequent reduction in funding. Adding to this pressure, the financial impacts of Covid-19 continue to disrupt service delivery and reduce fee income and now the Cost of Living Crisis significantly adds to our costs and is likely to increase demand for services.

1.2. To mitigate these austerity measures, the Council has already secured and delivered significant savings for over a decade in order to "balance the books" and maintain service delivery during the austerity period.

1.3. Leadership Team, Corporate Managers and the Finance Team have been involved in discussions to secure savings, without reducing service delivery as far as possible. However it is now a fundamentally more difficult challenge year-on-year and therefore, looking to the future, a new more strategic process will be required to match service provision to available funding. This needs to begin as soon as possible to give time for options to be identified and implemented.

1.4. On 1 November 2022, the report to Cabinet advised that the General Fund (GF) forecast a budget deficit of £2,111k in 2023/24 rising to over £5,219k by the end of the 5-year timeframe, based upon a number of key assumptions (e.g. Government funding, inflation rates, pay award, Council Tax levels, use of balances/reserves, etc.). Following a detailed review, particularly of fees and charges income, the 2023/24 deficit had reduced to £960k as reported to Cabinet on 30 November 2022. Within the 3 January Cabinet report, this has further reduced to £905k through additional service efficiencies.

1.5. During the January suite of Policy Development Group (PDG) meetings, further options largely around vacancy management were discussed with a view to achieving a savings target to balance the 2023/24 Budget. In addition, the PDG's were asked to identify what they viewed as the highest priority services, and those of a lower priority where additional savings could be considered.

1.6. This report shows the progress made towards balancing the 2023/24 General Fund Budget and recommends the associated Band D Council Tax charge for 2023/24 and summarises the Capital Programme and Housing Revenue Account for the year 2023/24.

2. January PDGs and Cabinet – Budget Update

2.1. Policy Development Group (PDG) and Scrutiny Committee meetings in January received an update on the latest budget shortfall position, which, as stated in paragraph 1.4, had reduced to £905k due to minor service efficiencies following a further review.

2.2. Throughout the budget process Scrutiny Committee and the PDGs have been kept informed and have considered various options during the drafting of the proposed 2023/24 Budget. During their January meetings, Scrutiny and the individual PDGs were asked to determine what they viewed as the highest priority services, and those of a lower priority where additional savings could be considered to help reduce the budget deficit. The following recommendations were made:

2.2.1. Environment Policy Development Group agreed:

- The Weed Team should not be reinstated;
- Waste Collection/Recycling/Open Spaces should be protected from budget and service provision reductions;
- Property Service Staff Unit and Administration Buildings could be considered for budget and service provision reductions.

2.2.2. Economy Policy Development Group agreed:

- The Economic Development team be considered a high priority service area which should be protected and recognised as generating income for the Council at a high ratio (relative to the cost of the service).

2.2.3. Homes Policy Development Group

Although no formal recommendations were made, the committee were comfortable to:

- To promote the Piper Alarm scheme to increase the customer base for this important service to the community;
- To support the HRA budget as set out.

In addition, the committee were keen to explore opportunities to generate additional income through the Repairs and Maintenance Team and through the redevelopment of garages into dwellings.

2.2.4. Community Policy Development Group agreed:

- That a vacancy factor should be set for Leisure services, as long as this does not impact on health and safety or income generation;
- That planned maintenance could be reduced, as long as this does not impact on health and safety;
- That community safety should be considered a high priority service area which should be protected;
- That Public Health should be considered a high priority service area which should be protected.

2.2.5. Scrutiny Committee agreed:

- Officers provide a report on a system of vacancy control that is transparent and inclusive of Members and the Scrutiny Committee. To include the projected targets for vacancy control and how it might be implemented;

- Officers to provide a report on the future funding of the Leisure Centres including the possibility of an inclusive budgeting exercise involving the electorate on the future funding of the leisure centres.

In addition, the committee reinforced the recommendation from Environment PDG regarding not reinstating the Weed Team.

3. Key Assumptions for the 2023/24 Budget

3.1. Members and Officers have carefully scrutinised all existing budgets and the service risks associated with delivering them. It has also examined all material income sources, especially discretionary fees and charges which have been increased, where applicable, to reflect the additional cost pressures faced.

3.2. In such rapidly and frequently changing circumstances (not to mention unprecedented), assumptions soon become superseded by events. Many of the original assumptions included within the original MTFP report on 1 November 2022 have now been replaced with actual numbers, such as the Financial Settlement. However, those related to inflation largely remain, for example the Pay Award will not be agreed prior to setting the Budget and fuel/commodity prices will fluctuate throughout the year. In respect of the Pay Award, the assumption has been updated to 5.5% (from 3%) based on the latest information available. This should be broadly sufficient for a flat cash increase similar to the 2022/23 uplift.

3.3. It is also difficult to assess levels of demand for services with continuing recovery from Covid-19, but likely implications arising from the Cost of Living Crisis, for example increases in benefits claimants but possibly reductions in planning applications. Therefore careful monitoring of service demands will need to be undertaken to ensure the organisation flexes to meet demand. This could have an impact on costs, i.e. agency costs to meet short term peaks, but may also offer opportunities to deliver savings through vacancy management and reductions in energy consumption.

3.4. Corporate Managers, in conjunction with the Finance Team, review all areas of income and expenditure for known increases / decreases based on both prevailing and predicted changes in demand, price inflation, contractual obligations, etc., when proposing the 2023/24 Budget. More volatile budgets are subject to sensitivity analysis and a reasonably prudent assessment is made.

3.5. In addition to the above, regard has been made to our existing and future levels of reserves and balances which are required. We have a number of ongoing commitments already made against these reserves and balances (e.g. future capital contributions, economic development and building projects, “spend to save” projects, business transformation, town centre regeneration, future grant settlements).

3.6. However, given the prevalence of uncertainty, it should be noted this budget may well vary to a material extent. The Deputy Chief Executive (S151 Officer) proposes this budget on the basis of the information that is available at this time and his judgement of the most likely outcomes. Any adverse movement in these numbers will require support from other areas of the General Fund, or potentially utilising reserves as a last resort. Therefore there will be a need for much earlier

intervention on reducing spend if financial monitoring indicates a shortfall position at the year end.

3.7. In January 2019 Cabinet amended the minimum level of general reserves required to be maintained at £2m. Although this level continues to be prudent due to the resilience offered by the level of Earmarked Reserves which the Council holds for specific projects, the potential implications of the 2022/23 outturn forecast may require this level to be reviewed. Furthermore, Government are highlighting the level of local authority reserves and advising that they should be used to mitigate the impact of the Cost of Living Crisis.

3.8. Using these reserves to fund recurrent General Fund expenditure must be considered an option of last resort. It is inherently unsustainable (they can only be spent once) and with the forecast financial challenges this Council will face in the coming years, it is imperative that they are maintained at the highest level possible.

4. Requirements for Council Tax Setting

4.1. In recent years the Government (via the DLUHC) has become far more prescriptive with regard to acceptable levels of Council Tax increases. The implementation of the Localism Act has effectively replaced Government set "capping limits" and replaced them with principles that allow the local electorate to call for a referendum if the Council is planning to increase its Council Tax above an acceptable level. The level for District Councils announced as part of the Autumn Statement and confirmed within the Settlement was set at a maximum of the greater of 3% or £5 for the 2023/24 budget year.

4.2. Although lobbying continues from the sector to increase this "cap" to £10, the 'acceptable level' is defined by the Chancellor as part of the national budget-setting process and all government calculations on 'spending power' of local authorities are on the basis that authorities increase Council Tax to the maximum amount permitted.

4.3. The Council Tax income included in the proposed budget includes a £6.56 (2.99%) increase. This equates to a Band D charge of £225.40 (a 1% variation to our Council Tax changes the income generated by approximately £65k).

5. General Fund Budget 2023/24

5.1. The proposals contained in this report result in a balanced budget for the General Fund (see **Appendices 1 and 2**). The forecast budget deficit last reported to Cabinet stood at £905k. The following table shows the recommended actions necessary to move towards a balanced position.

Table 1 – Reconciliation of proposed balancing adjustments

Movements	Amount £k
Budget Shortfall presented to January Cabinet, PDG's / Scrutiny	**905**
Implications of the Finance Settlement and other Government Grants	7
Additional Business Rates Growth / Revaluation – net of contributions to EMR	(205)
Introduction of vacancy management targets – Supported by PDGs / Scrutiny	(400)
Further refinement of the Planned Maintenance budget – Supported by Community PDG	(250)
Further Service savings (in lieu of contributions from Town/Parish Councils):	
Grounds Maintenance – reduction in grass cutting	(66)
A review of Paddling Pools – leading to possible mothballing	(70)
Refinement of Service Budgets (assumptions for Fuel, 3-Weekly Recycling)	(86)
Net Refinement of Salary Budgets (including the increase to 5.5% pay award)	+ 281
Finalisation of the recharges to HRA	(12)
Contribution to Planning Appeals EMR	+ 100
Further increase in the Council Tax in-year collection surplus	(25)
Refinement of Contributions from Reserves	(121)
Current Budget Shortfall for 2023/24 (see 5.8)	**58**
Temporary transfer from New Homes Bonus EMR	**(58)**

5.2. Members have previously been provided with a summary of the Finance Settlement implications. Further analysis and subsequent grant announcements have further improved the position from the £180k gain indicated within the previous summary.

5.3. The significant element of this settlement gain relates to Business Rates. The Business Rates NNDR1 return is included as a separate report on this meeting's agenda. This has shown a healthy increase in the rateable value of the businesses within the district. In addition, as highlighted previously to Cabinet, following the recent national Business Rates Revaluation exercise, the Rateable Value of many local businesses has increased. This is mainly because we have a higher proportion of industrial category companies, as opposed to Retail or Office based companies whose Rateable Values have reduced. The ever-present risk of appeals, which the Valuation Office consider on a daily basis, and the heightened risk of bad debts arising necessitates that we prudently set aside significant funds in our Business Rates Smoothing Reserve to mitigate these risks.

5.4. The vacancy factor has been considered by all PDG's and Scrutiny. Although not ideal, Members understood the need for this and the potential implication for service delivery during 2023/24. Scrutiny requested regular progress updates against this target which will be provided.

5.5. Further short-term reductions to scheduled maintenance has been identified. This is where maintenance is due, but following a review of the assets it has been deemed low risk to delay that maintenance. There is no health and safety risk with this reduction, and all assets will continue to be monitored to ensure that works can be undertake if the need is identified.

5.6. As previously outlined, the Council has approached the Town and Parish Councils for additional financial support. Although there is on-going dialogue, it appears that no additional funding has been agreed. Therefore, Environment PDG considered some specific service reductions in relation to reducing the number of Grass Cuts per annum, and a review of paddling pools, which could result in them being mothballed if insufficient funds are available to maintain them adequately. The PDG did not endorse these ideas, but due to the scale of the budget shortfall, it is proposed these savings are approved.

5.7. Despite further analysis work and discussions with Members and Budget Holders, and a number of other further savings options identified by officers, it was not possible to identify the full £905k ongoing savings target set.

5.8. Therefore the remaining budget shortfall has been reduced on a one-off basis in the very short term by the use of reserves. To set a balanced budget, that continues to provide the current level of service provision wherever possible, will require an additional use of £58k from the New Homes Bonus Earmarked Reserve.

5.9. Members should note that the Final Settlement will not be announced until after publication of this report (indeed possibly after Cabinet have met). Any additional funding announced will reduce the need to draw further from the New Homes Bonus reserve. With the demise of this as an ongoing funding source, the Council has started planning for a balanced budget without drawing on this historic funding source.

6. Future Funding Concerns/Cost Pressures

6.1. It is clear that Members' preference is to explore all revenue-raising options before cutting services. However, due to the increasing pressures on our budgets and the continuing reduction in our Central Government funding, the Council will need to reassess its overall corporate priorities and therefore where it allocates future budgets, it will also need to consider:

- Statutory vs Discretionary service provision;
- Resident priorities – as per the recent consultation undertaken (budget related summary previously circulated);
- How it can work more closely with Towns/Parishes;
- Explore more commercial and regeneration opportunities (being aware of the risks);
- Continue to consider any partnership possibilities;
- Review Treasury options;
- Maximise all income possibilities;
- Impact of funding changes: Fair Funding Review; NNDR baseline reset; changes to NHB;
- The need to create investable propositions for our carbon reduction ambitions.

6.2. The Council has stated its intent to try and achieve a net zero carbon operation by 2030. There remains a substantial challenge ahead if this target is to be achieved. From a carbon accounting perspective, the fact that we retain direct control (and ownership) over the majority of services means that while our

influence is unfettered by long-term commissioning or contractual arrangements, we retain ownership of the significant challenges around decarbonisation. The future year's Capital Programme includes a range of investments in improving the energy efficiency of our property estate, subject to securing sufficient funding.

6.3. Not least in the area of social housing provision, where we have to balance the long-term viability of our social housing stock for the needs of future generations, with the need to invest substantially to reduce emissions (housing stock makes up the bulk of MDDC emissions). The Capital Programme includes a number of substantial housing developments increasing the amount of housing stock with highly efficient (zero carbon) modular buildings, subject to securing sufficient external funding. This continues across the 5-year Medium Term Financial Plan with the aim of developing 500 new properties.

6.4. However, with limited funding available from Government, and any such funding subject to a bidding process, in the short term we will be trying to achieve the maximum possible locally, while taking every opportunity to bid into future funding pots as they arise.

6.5. The NHB grant monies have been considered at risk for some time. It's possible that a further one-off allocation could be announced for 2024/25. It remains unclear what will happen to the funding associated with the current scheme. While we do not yet know what any new scheme may include, it can be assumed that meeting and exceeding our growth targets will be critical to ensuring that we access whatever revised distribution methodology the government implements.

6.6. As such, it's important to highlight how much New Homes Bonus is being used to help fund our General Fund and Capital Budgets in 2023/24. A total of £1,700k is being used to contribute towards various one-off General Fund projects, including:

- £364k one-off annual grant for 2023/24
- £218k towards the Cullompton HAZ from the existing EMR;
- £80k towards Business Development from the existing EMR;
- £45k to the Grand Western Canal from the existing EMR; and
- £993k to support the existing Capital Programme from the existing EMR.

As stated in para 5.8 above, to close the budget gap, it is recommended that this be increased by a further £58k, as referred to in **Recommendation 3** of this report.

6.7. It is clear is that local authorities are in desperate need of a multi-year funding agreement rather than the current year-to-year arrangements which do not allow a considered medium term view of the resources that will be available, and, how these may be managed to optimise service provision within the scope of the Corporate Plan.

7. Overall General Fund (GF) position at 31 March 2023

7.1. Recent verbal updates, and the detailed report included alongside this Cabinet report, indicate the in-year budget position is trending towards a substantial overspend. This largely relates to the Pay Award, which significantly exceeded the assumed 2% uplift. Similarly, the increases in energy and fuel costs also dwarf the assumed budget increases. If the Outturn position does continue as forecast, the General Fund Reserve balance will reduce below the current agreed minimum level of £2,000k. The S151 will review this position at year end and may recommend an alteration to that minimum balance, or the release of Earmarked Reserves to bolster the General Reserve back to that recommended minimum level. Therefore, no draw on General Reserves is recommended to support the 2023/24 Budget.

8. Transfers To and (From) Earmarked Reserves

8.1. **Appendix 3** shows in detail which amounts are being contributed to, or drawn down from, various earmarked reserves in 2023/24.

8.2. It is proposed to transfer £1,598k into earmarked reserves to help mitigate future pressures. This includes:

- £1,161k into various Sinking Funds relating to property, plant and equipment maintenance, and Vehicle replacement and repairs;
- £137k into Business Rates Smoothing;
- £120k into the Statutory Development Plan;
- £100k into a Planning Appeals reserve;
- £50k into a Business Systems Migration reserve; and
- £25k into District Elections.

8.3. It is also proposed to drawdown £3,266k to fund expenditure in 2023/24, this includes:

- £965k utilisation of Sinking Funds and Maintenance budgets supporting the investment in our assets;
- £478k utilisation of vehicle reserves supporting the investment in our vehicle fleet;
- £358k of funds to cover prior year deficits on the Collection Fund;
- £343k utilisation of New Homes Bonus (as outlined within para 6.6)
- £270k supporting the Statutory Development Plan;
- £205k towards the delivery of the Cullompton HAZ;
- £182k towards the cost of the Homes for Ukraine Scheme;
- £125k towards the cost of the District Election and Member development;
- £122k supporting the development of the Garden Village; and
- £116k towards the one off costs forecast with services
- £80k released back to the General Fund.

This gives a net reduction in Earmarked Reserves of £1,667k, prior to the proposed £58k balance adjustment through NHB.

9. Housing Revenue Account Budget 2023/24

9.1. The Housing Revenue Account (HRA) is ring fenced and accounts for the income and expenditure associated with the Council's statutory housing obligations to its tenants. The HRA has an obligation to provide a high quality, value for money service for its tenants coupled with affordable rent levels.

9.2. The Council continues to undertake valuable benchmarking work in conjunction with Housemark. These findings are then used to inform the budget setting process. In doing so, MDDC are able to better identify their position in relation to other authorities in the sector and identify areas for improved efficiency.

9.3. The overall HRA budget has been constructed on a detailed line-by-line examination of expenditure and income, having regard to last year's outturn, this year's forecast position and the on-going improvement of the housing service.

9.4. Some items of expenditure can be defined quite accurately whilst others require managers to exercise business judgement based upon their experience, particularly in the case of new commitments. Where such judgement has been applied, the proposals before Members are based upon realistic assumptions.

9.5. The main proposals for the 2023/24 budget can be summarised as follows:

Expenditure:

- An update to the base budget to reflect the additional cost of the higher than expected pay award for 2022/23;
- An assumed pay award for 2023/24 equivalent to 5.5%;
- An Increase in the Pension Contribution rate of 2.4% to 19.0%;
- Increased energy costs of c180% and fuel costs of c40%, along with a significant increase in waste disposal costs;
- The increased financing costs associated with the ambitious development programme.

Income

- A below inflation increase of 7% is proposed on existing rents in line with the Governments cap for 2023/24;
- Garage rents and Garage plot ground rents to be frozen, remaining unchanged at £10.71 per week and £275 per annum respectively.
- Increased interest yields on balances held.

9.6. The overall rental income was materially affected by the Governments previous policy to reduce Rents by 1% each year for four consecutive years. Although the current policy is to enable rents to be increased by 1% above inflation, the Government have capped this to 7% given the current level of inflation. A more detailed analysis of the proposed rent increase can be found in **Appendix 5** that shows that the average housing rent will increase to £89.88 on a 52 week basis.

9.7. Current legislation on Right to Buy means that we're likely to sell several properties in future years. We estimate, based on historic data that 16 will be sold next year.

9.8. Similarly, we forecast that we will have a number of void properties during the year. We have a prudent forecast of 70 voids across the year in line with previous years to reflect the financial implications on tenants of the Cost of Living

Crisis (this was previously increased to reflect the move to Universal Credit and Covid-19). This is broadly in line with the forecast Council Tax collection rate of 96.5%. Combined, these reductions affect our ability to fund property maintenance and development as well as servicing any existing or new debt.

9.9. Budget continues to be included to address legislation post Grenfell and to undertake further Fire Risk remedial action. However, significant further investment will be required to further contribute to the decarbonisation of the Housing Estate and achieve Net Zero by 2030.

9.10. It has been deemed as prudent to maintain the HRA reserve balance at £2,000k and it is expected to remain so throughout 2023/24. At the start of 2022/23, other HRA reserves totalled £21,233k. This included £15,863k in the Housing Maintenance Fund (HMF); £814k in the Renewable Energy Fund (REF) and £255k in Major Repairs Reserve. It is intended that any expenditure funded from the REF monies be used on renewable energy schemes.

9.11. The final budget summary for the 2023/24 HRA is shown in **Appendix 4**. It will continue to provide for an enhanced housing service which will allow for more capital investment and additions to our existing stock.

9.12. The ambition to build a significant number of new properties continues across the 5-year Medium Term Financial Plan. The prospect of building new social housing raises the issue of significant future capital financing requirements. Budget at assumed interest rates of circa 5% is included within the future years of the MTFP to finance the build of a number of new highly efficient (zero carbon) modular buildings, subject to securing sufficient funding. Members are reminded that the constraint on increasing stock is still an issue of affordability, not the access to borrowing.

10. Capital Programme 2023/24

10.1. Full detail on this matter is included within in a separate agenda item on this meeting.

10.2. In summary, it shows that the 2023/24 programme includes projects expected to start in 2023/24 totalling £98,375k. In addition, there is £39,432 rolling forward from the current programme. The nature of capital projects means that they span more than one year, therefore, within this overall approval, £64,826k is expected as the Deliverable Budget for 2023/24.

10.3. The Deliverable Budget includes a significant investment in Housing, either through the HRA Housing delivery programme (£15,655k) or through 3 Rivers (£26,108k – subject to approval of a Business Plan). A prudent assumption has been included for the utilisation of 1-4-1 receipts or for additional grant funding to be made available from Homes England; although a substantial element of the cost remains with the Council.

10.4. In addition, plans continue with the HIF projects in Cullompton at a cost of £13,105k. The latest Levelling-Up bid was again rejected, therefore the associated funding is yet to be identified but the Council is actively pursuing all avenues. As with all capital projects, these are all subject to a full appraisal.

10.5. The most significant funding source required to support the 2023/24 programme is the £43,294k of assumed borrowing from the Public Works Loan Board (PWLB). The associated capital financing costs are included within the relevant GF or HRA budget. However, it should be recognised that wherever possible, the Council will continue to maximise its usage of internal borrowing to minimise the financing costs.

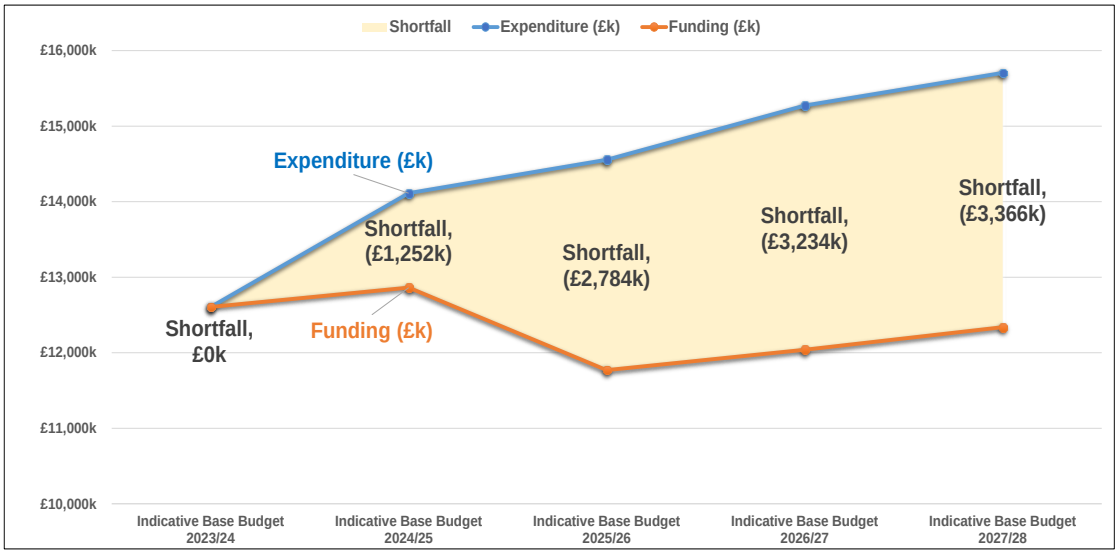
10.6. The future year's Capital Programme shows increased investment in improving the energy efficiency of our property estate and the continuation of investment to increase the HRA Housing stock. The overall borrowing requirement rises accordingly and therefore so does the capital financing costs within the Revenue Budget. These projects will be further refined over time and will be subject to sufficient funding being available.

11. Updated MTFP position

11.1. The new General Fund MTFP summary position is shown in the table below. It shows a cumulative shortfall of £3,366k over the remaining four-years of this MTFP which remains to be addressed.

Table 2 – Future Medium Term Financial Plan – General Fund

	2024/25 £k	2025/26 £k	2026/27 £k	2027/28 £k
Annual Surplus / Deficit	1,252	1,532	450	132
Cumulative Surplus/Deficit	**1,252**	**2,784**	**3,234**	**3,366**



11.2. The underlying budget shortfall falls largely in 2024/25 due to a reduced assumption of Earmarked Reserves supporting expenditure, and in 2025/26 due to the expectation of the implementation of the long overdue funding reforms. The latter years are forecast to be broadly more manageable.

11.3. This forecast position also makes a number of prudent assumptions, including:

- No new grant due to MDDC within the replacement New Homes Bonus Scheme and no further one-off allocations of NHB from 2025/26;
- A loss of historic growth in business rates above the baseline, on reset of the business rates system in 2025/26;

- No collection fund surplus or deficit from Council Tax or Business Rates until 2025/26;
- No Business Rates pooling income, which would probably not continue after a reset of the system;
- No further continuation of the allocation of Lower-Tier Services grant (initially announced as one-off);
- No grant funding continuing post 2025/26 other than the Rural Services Delivery Grant;
- The reduction in Council Tax referendum principles back to previous levels (£5 or 2%) from 2025/26;
- Pay Award and general inflation in line with assumptions reverting back to "normal" levels across the MTFP timeframe.

11.4. The same level of uncertainty will be facing all local authorities across the country.

12. Conclusion

General Fund

12.1. The General Fund budget has been set against a backdrop of over a decade of cuts to Public Sector funding, a global pandemic and now a once in a generation Cost of Living Crisis. However, the proposed balanced budget protects service delivery at current levels. This has been achieved with the use of a small amount of one-off funding from reserves and balances and that the vacancy management savings can be managed to minimise any impact on service delivery. However, further ongoing budget savings options will need to be identified to mitigate the underlying budget shortfall across the remainder of this MTFP.

12.2. Significant uncertainty remains for the future funding of Local Government. Further delays were announced to the outcomes of the Fair Funding Review and potential changes to both Business Rates and New Homes Bonus. These changes are now due in 2025/26.

HRA

12.3. The HRA budget for 2023/24 continues to address a number of important factors, such as the Post Grenfell and Fire Risk Assessment requirements and a marked increase in the overall number of units through significant investment. These investments continue across the whole 5-year MTFP period.

12.4. Rents are proposed to increase by 7% in line with the Government's guidance and neighbouring authorities. A prudent allowance has been made for voids and non-collection, in line with that applied to Council Tax, taking into account the current economic climate.

12.5. This report has set out a proposed balanced budget for the HRA for 2023/24, with appendices attached showing the following:

Appendix 4 – The overall makeup of the budget at summary level
Appendix 5 – The proposed rent and fees and charges for 2023/24

12.6. Similarly to the General Fund, the longer term position for the HRA shows the funding shortfall although not to the same degree. Along with 2023/24, 2024/25 is indicatively balanced with relatively small shortfalls in years 2025/26 to 2027/28, as follows:

Table 3 – Future Medium Term Financial Plan – HRA

	2024/25 £k	2025/26 £k	2026/27 £k	2027/28 £k
Annual Surplus / Deficit	0	62	193	212
Cumulative Surplus/Deficit	**0**	**62**	**255**	**468**

12.7. Work continues to refine the position in order to balance the budget for the years ahead.

Capital Programme

12.8. The Capital Programme for 2023/24 includes the beginning of a programme of significant investment in social and affordable housing. The capital MTFP also includes investment into improving the energy efficiency of our property estate, and in the economic regeneration of the district. However these projects, as with any capital project, are subject to the Council receiving sufficient grant funding and a robust business case.

12.9. Therefore assumptions are built in that the Council will be successful in attracting funding through the increasing number of bid schemes for grant funding. Additional borrowing is also projected which is forecast to increase our Capital Financing Requirement to c.£97m (see Treasury Management Strategy included elsewhere on this agenda), although wherever possible, this will be mitigated through maximising the use of internal borrowing. The Revenue MTFP includes the associated financing implications.

12.10. It is, therefore, imperative that capital funds are only spent on those projects that enable the Council to deliver its Corporate Plan objectives, reduce operational cost, or generate a financial return.

Future Budgets

12.11. The Council will need to prepare for the future in a timely manner and this is why it will continue to discuss how it can provide a wide range of services in a much reduced funding envelope. The process will continue to involve all staff, Members and our local residents/businesses.

12.12. Cabinet are asked to agree the contents of this report and recommended its approval by Council in February 2023.

Contact for more information: Andrew Jarrett, Deputy Chief Executive (S151)
01884 234242 (ajarrett@middevon.gov.uk)

Paul Deal, Corporate Manager for Financial Services
pdeal@middevon.gov.uk

Circulation of the Report:	Leadership Team, Cabinet
Background Papers:	November & January Cabinet & PDG's (MTFP, Budget Draft and Budget Update reports)

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Appendix 1

The Table below gives an overall summary of the Council's General Fund MTFP position (which includes a wide range of assumptions).

MTFP General Fund Summary

2022/23 £'000		Notes	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
14,785	**Net Direct Cost of Services**		16,720	15,356	15,918	16,416	16,973
(1,715)	Net recharge to HRA	1	(1,872)	(1,926)	(1,963)	(2,001)	(2,040)
687	Provision for Repayment of Borrowing	2	703	929	1,039	1,150	1,146
13,757	**Net Service Costs**		**16,720**	**15,356**	**15,918**	**16,416**	**16,973**
(993)	Net Interest Payable / (Receipts)	3	(1,532)	(1,365)	(1,585)	(1,745)	(1,745)
153	Finance Lease Interest Payable		180	200	126	116	106
(2,677)	Net Transfers to / (from) Earmarked Reserves	4	(1,594)	918	1,019	1,338	1,264
10,240	**Total Budget Requirement**		**12,606**	**14,113**	**14,554**	**15,274**	**15,704**
	Funded By:						
(1,855)	Retained Business Rates	5	(4,319)	(4,360)	(3,997)	(4,040)	(4,106)
0	Revenue Support Grant	6	(98)	(98)	0	0	0
(99)	Lower Tier Services Grant	6	0	0	0	0	0
(490)	Rural Services Delivery Grant	6	(490)	(490)	(490)	(490)	(490)
(719)	New Homes Bonus	6	(395)	(395)	0	0	0
(153)	2022/23 Services Grant	6	(86)	(86)	0	0	0
0	Funding Guarantee	6	(469)	(469)	0	0	0
(6,925)	Council Tax–MDDC	7	(6,749)	(6,963)	(7,284)	(7,510)	(7,742)
(10,240)	**Total Funding**		**(12,606)**	**(12,862)**	**(11,770)**	**(12,040)**	**(12,338)**
0	**Annual Shortfall – Increase / (Decrease)**		**0**	**1,252**	**1,532**	**450**	**132**
0	**Cumulative Shortfall**		**0**	**1,252**	**2,784**	**3,234**	**3,366**

Notes:

1. Recharges have been calculated based upon the updated salary budgets.
2. The Provision for Repayment of Borrowing incorporates the financial implications of the proposed Capital Programme shown in Appendix 4.
3. The increase in Net Interest Costs / (Receipts) reflects the increase in interest rates and a prudent assumption of the interest earnt from 3 Rivers Developments Ltd in line with the Business Plan. At present, no new external borrowing is forecast, which lowers the previous assumption in Interest Payable.
4. Net Transfers to / (from) Earmarked Reserves reflects planned contributions to, or drawdowns from reserves, including the balancing contribution of £58k from New Homes Bonus. The 2023/24 value includes the final drawdown from the Business Rates and Council Tax Smoothing Reserves to offset the loss caused by Covid-19 reliefs being applied (see Note 4).
5. The Retained Business Rates income has increased in 2023/24 due to growth and the revaluation. Income drops in 2025/26 to reflect the potential changes the Government might implement to the Business Rates Retention Scheme. These include Re-Baselining and Resource Equalisation.

6. The Government announced the Provisional Local Government Finance Settlement for 2023/24. It includes a funding guarantee that all Councils receive a 3% increase in “Core Spending” before taking into account any increases to Council Tax. The Council will received Revenue Support Grant again due to two other grants being transferred into the overall settlement consideration.
7. Council Tax income is forecast assuming Band D charge increases in line with the 3% referendum limit and the agreed Taxbase.

Appendix 2 - Detailed Budget Movements by Service

Service Unit	Direct Costs Detail	2022/23 Annual Budget £	MTFP Adjustment £	Round 1 Detailed Update £	Round 2 Detailed Update £	Provisional 2023/24 Budget £	Increase / (Decrease) £	Increase / (Decrease) %
	Cabinet							
SCM01	Leadership Team	534,019	1,152,454	(1,107,880)	12,780	**591,373**	57,354	10.7%
SCM02	Corporate Functions	108,465	40,028	26,964	4,130	**179,587**	71,122	65.6%
SCM03	Corporate Fees	258,730	200,065	(93,055)	(300,000)	**65,740**	(192,990)	(74.6%)
SCM06	Pension Backfunding	801,480	100,000	(254,906)	-	**646,574**	(154,906)	(19.3%)
SES01	Emergency Planning	7,500	-	-	-	**7,500**	0	0.0%
SFP01	Accountancy Services	478,460	128	39,044	10,960	**528,592**	50,132	10.5%
SFP02	Internal Audit	97,480	-	(2,720)	-	**94,760**	(2,720)	(2.8%)
SFP03	Procurement	101,340	24	7,480	1,480	**110,324**	8,984	8.9%
SFP04	Purchase Ledger	48,460	19	5,755	1,210	**55,444**	6,984	14.4%
SFP05	Sales Ledger	47,330	19	5,810	1,210	**54,369**	7,039	14.9%
SHR01	Human Resources	497,080	114	(49,780)	9,180	**456,594**	(40,486)	(8.1%)
SHR02	MDDC Staff Training	25,000	-	(5,000)	-	**20,000**	(5,000)	(20.0%)
SHR03	Payroll	40,960	13	2,100	1,060	**44,133**	3,173	7.7%
SHR04	Learning And Development	53,430	13	7,575	1,170	**62,188**	8,758	16.4%
SIT01	IT Gazetteer Management	76,400	26	4,840	1,880	**83,146**	6,746	8.8%
SIT03	IT Information Technology	1,260,750	(44,811)	(14,502)	14,970	**1,216,407**	(44,343)	(3.5%)
SLD01	Electoral Registration	218,278	52	131,732	2,870	**352,932**	134,654	61.7%
SLD02	Democratic Rep And Management	544,662	31,373	15,886	3,990	**595,911**	51,249	9.4%
SLD04	Legal Services	419,661	97	42,339	(43,250)	**418,847**	(814)	(0.2%)
SPR01	Building Regulations	17,390	166	17,761	(26,392)	**8,925**	(8,465)	(48.7%)
SPR04	Local Land Charges	(24,561)	24	(19,266)	1,297	**(42,506)**	(17,945)	73.1%
SRB01	Collection Of Council Tax	382,270	35,380	59,957	76,010	**553,617**	171,347	44.8%
SRB02	Collection Of Business Rates	(98,870)	-	11,660	-	**(87,210)**	11,660	(11.8%)
SRB03	Housing Benefit Admin & Fraud	180,920	89	29,480	10,540	**221,029**	40,109	22.2%
SRB04	Housing Benefit Subsidy	65,000	-	-	-	**65,000**	0	0.0%
SRB06	Debt Recovery	78,680	47	14,490	3,500	**96,717**	18,037	22.9%
TOTAL CABINET PDG		**6,220,314**	**1,515,320**	**(1,124,236)**	**(211,405)**	**6,399,993**	**179,679**	**2.9%**
	Community PDG							
SCD01	Community Development	138,500	-	-	-	**138,500**	0	0.0%
SCS20	Customer Services Admin	23,720	-	(5,490)	-	**18,230**	(5,490)	(23.1%)
SCS22	Customer First	725,598	506	28,700	16,609	**771,413**	45,815	6.3%
SES03	Community Safety - C.C.T.V.	16,390	5	41,390	-	**57,785**	41,395	252.6%
SES04	Public Health	3,990	-	(500)	-	**3,490**	(500)	(12.5%)
SES11	Pool Cars	1,884	967	(1,712)	(520)	**619**	(1,265)	(67.1%)
SES16	Public Health Staff Units/Recharges	792,330	32,192	(10,688)	18,040	**831,874**	39,544	5.0%
SES17	Community Safety	6,070	-	(2,200)	-	**3,870**	(2,200)	(36.2%)
SES18	Food Safety	(25,340)	6	10,500	-	**(14,834)**	10,506	(41.5%)
SES21	Licensing	24,030	61	(959)	4,010	**27,142**	3,112	13.0%
SES22	Pest Control	2,500	-	(1,500)	-	**1,000**	(1,500)	(60.0%)
SES23	Pollution Reduction	7,250	-	6,020	-	**13,270**	6,020	83.0%
SPR02	Enforcement	92,800	93	7,677	2,250	**102,820**	10,020	10.8%
SPR03	Development Control	587,570	(252,605)	117,104	27,476	**479,545**	(108,025)	(18.4%)
SPR09	Forward Planning	306,890	(84,578)	91,590	6,560	**320,462**	13,572	4.4%
SPR11	Regional Planning	234,760	31,740	3,000	-	**269,500**	34,740	14.8%
SRS01	Recreation And Sport	903,485	(25,935)	830,151	(305,985)	**1,401,716**	498,231	55.1%
TOTAL COMMUNITY PDG		**3,842,427**	**(297,548)**	**1,113,083**	**(231,560)**	**4,426,402**	**583,975**	**15.2%**
	Economy PDG							
SCD02	Economic Development	70,320	12,135	(5,494)	2,300	**79,261**	8,941	12.7%
SCP01	Parking Services	(489,680)	(105,475)	(70,355)	-	**(665,510)**	(175,830)	35.9%
SPR06	Economic Development	706,700	(150,495)	286,392	9,040	**851,637**	144,937	20.5%
SPS12	GF Properties Shops/Flats	(306,890)	2,178	112,762	-	**(191,950)**	114,940	(37.5%)
TOTAL ECONOMY PDG		**(19,550)**	**(241,657)**	**323,305**	**11,340**	**73,438**	**92,988**	**(475.6%)**

Appendix 2 - Detailed Budget Movements by Service

Service Unit	Direct Costs Detail	2022/23 Annual Budget £	MTFP Adjustment £	Round 1 Detailed Update £	Round 2 Detailed Update £	Provisional 2023/24 Budget £	Increase / (Decrease) £	Increase / (Decrease) %
	Environment PDG							
SES02	Cemeteries	(67,230)	1,701	33,160	130	**(32,239)**	34,991	(52.0%)
SES05	Open Spaces	180,190	3,162	211,947	(69,920)	**325,379**	145,189	80.6%
SGM01	Grounds Maintenance	559,523	14,808	27,665	(56,720)	**545,276**	(14,247)	(2.5%)
SPS01	Asset Management	188,310	15,343	(5,980)	1,390	**199,063**	10,753	5.7%
SPS03	Flood Defence And Land Drain	26,020	12	-	-	**26,032**	12	0.0%
SPS04	Street Naming & Numbering	8,070	2	(1,430)	81	**6,723**	(1,347)	(16.7%)
SPS05	Administration Buildings	425,140	89,103	139,162	-	**653,405**	228,265	53.7%
SPS06	MDDC Depots	499,720	35,316	(43,934)	-	**491,102**	(8,618)	(1.7%)
SPS07	Public Transport	(6,110)	1	(17,320)	-	**(23,429)**	(17,319)	283.5%
SPS09	Property Services Staff Unit	734,650	6,729	34,092	5,842	**781,313**	46,663	6.4%
SPS11	Public Conveniences	41,330	(27,725)	20,345	-	**33,950**	(7,380)	(17.9%)
SWS01	Street Cleansing	472,798	17,510	48,405	6,550	**545,263**	72,465	15.3%
SWS02	Waste Collection	435,192	134,846	100,246	13,760	**684,044**	248,852	57.2%
SWS03	Recycling	620,030	43,875	215,994	(24,730)	**855,169**	235,139	37.9%
SWS04	Waste Management	377,770	104	3,362	9,000	**390,236**	12,466	3.3%
TOTAL ENVIRONMENT PDG		**4,495,403**	**334,787**	**765,714**	**(114,617)**	**5,481,287**	**985,884**	**21.9%**
	Homes PDG							
SES15	Private Sector Housing Grants	(1,490)	-	(1,670)	-	**(3,160)**	(1,670)	112.1%
SHG03	Homelessness Accommodation	269,192	6,917	61,271	5,025	**342,405**	73,213	27.2%
TOTAL HOMES PDG		**267,702**	**6,917**	**59,601**	**5,025**	**339,245**	**71,543**	**26.7%**
	Net Direct Services Costs	**14,806,296**	**1,317,819**	**1,137,467**	**(541,217)**	**16,720,365**	**1,914,069**	**12.9%**
5000	Net Recharge to HRA	(1,714,560)	(85,728)	(71,942)	(11,580)	**(1,883,810)**	(169,250)	9.9%
6000	Capital Financing	686,660	(224)	16,828	-	**703,264**	16,604	2.4%
	Net Service Costs	**13,778,396**	**1,231,867**	**1,082,353**	**(552,797)**	**15,539,819**	**1,761,423**	**12.8%**
SIE03/6	Net Interest Costs /(Receipts)	(992,613)	(12,500)	(526,734)	-	**(1,531,847)**	(539,234)	54.3%
4115	Finance Lease Interest Payable	152,600	12,500	15,260	-	**180,360**	27,760	18.2%
4694	Transfers TO Earmarked Reserves	1,759,064	(629,764)	16,510	579,692	**1,725,502**	(33,562)	(1.9%)
7709	Transfers (FROM) Earmarked Reserves	(2,758,647)	1,342,917	(1,465,074)	(426,710)	**(3,307,514)**	(548,867)	19.9%
	Net Budget Requirement	**11,938,800**	**1,945,020**	**(877,685)**	**(399,815)**	**12,606,320**	**667,520**	**5.6%**
SIE11	Business Rates	(3,532,190)	(26,000)	(324,000)	(436,770)	**(4,318,960)**	(786,770)	22.3%
SIE08	Council Tax	(6,945,960)	192,430	(4,820)	9,320	**(6,749,030)**	196,930	(2.8%)
SIE10	Un-Ringfenced Grant Funding	(1,460,650)	-	-	(77,680)	**(1,538,330)**	(77,680)	5.3%
	Total Funding	**(11,938,800)**	**166,430**	**(328,820)**	**(505,130)**	**(12,606,320)**	**(667,520)**	**5.6%**
	Annual Shortfall	**0**	**2,111,450**	**(1,206,505)**	**(904,945)**	**0**	**0**	**0.0%**

2023/24 Transfers To / (From) Earmarked Reserves — Appendix 3

2023/24 BUDGETS
Transfers To Earmarked Reserves

SERVICE	EMR		Total
IE440	EQ659	NNDR SMOOTHING EMR	136,770
PS990	EQ685	FORE STREET MAINT S.FUND	5,000
PS992	EQ685	MARKET WALK MAINT S.FUND	20,000
CP540	EQ686	PAYING CAR PARKS (MACHINE REPLACEMENT SINKING FUND)	3,000
LD201	EQ720	ELECTION COSTS - DISTRICT	25,000
PR810	EQ728	STATUTORY DEVELOPMENT PLAN	120,000
EQ756	EQ756	FLEET CONTRACT FUND	639,600
GM/WS	EQ760	STREET SCENE SMALL PLANT	19,010
EQ761	EQ761	RECYCLING PLANT SFUND	30,000
EQ763	EQ763	RECYCLING MAINT SINKING FUND	2,700
PS880	EQ765	BUS STATION	5,000
ES100	EQ766	CEMETERIES	25,000
ES450	EQ767	PARKS & OPEN SPACES	25,000
RS140	EQ837	LEISURE SINKING FUND	75,000
PS980	EQ837	PROPERTY MAINTENANCE	311,580
PR100	EQ775	BUILDING CONTROL	5,420
PR200	EQ774	PLANNING LEGAL EXPENSE RESERVE	100,000
IT200	EQ749	BUSINESS SYSTEMS MIGRATION	50,000
TOTAL			**1,598,080**

2023/24 BUDGETS
Transfers (From) Earmarked Reserves

SERVICE	EMR	Description	TOTAL
CD200	EQ653	COMMUNITY DEVELOPMENT	(45,000)
EQ638	EQ638	DEV CONT LINEAR PARK	(4,170)
EQ640	EQ640	W52 POPHAM CLOSE COMM FUND	(1,950)
EQ641	EQ641	W67 MOORHAYES COM DEV FUND	(1,630)
EQ642	EQ642	W69 FAYRECROFT WILLAND EX WEST	(4,620)
EQ643	EQ643	W70 DEVELOPERS CONTRIBUTION	(6,650)
EQ644	EQ644	DEV CONT WINSWOOD CREDITION	(3,080)
CP530	EQ707	RESURFACING AMENITY CAR PARKS	(21,000)
CP540	EQ708	RESURFACING P&D & PERMIT CAR PARKS	(26,000)
EQ756	EQ756	FLEET CONTRACT FUND	(477,920)
RS100	EQ764	LEISURE MAINT SINKING FUND	(321,000)
CB100	EQ766	CEMETERY MAINT SINKING FUND	(80,000)
OS455	EQ767	PARK & OPEN SPACES MAINT SINKING FUND	(97,000)
PS991	EQ771	INDUSTRIAL UNIT SPECIFIC MAINT	(41,900)
IE420	EQ777	C/TAX SMOOTHING EMR	(62,401)
IE440	EQ659	NNDR RESERVE	(295,105)
PR225	EQ824	GARDEN VILLAGE PROJECT	(121,865)
PS810	EQ827	PHOENIX HOUSE MAINT	(144,000)
PS810	EQ828	PHOENIX HOUSE AIR CON	(6,400)
PS850	EQ829	OLD ROAD DEPOT	(35,000)
OS450	EQ837	PROPERTY MAINT RESERVE	(183,000)
PR400	EQ653	BUSINESS DEVELOPMENT	(80,000)
PR402	EQ653	CULLOMPTON HAZ	(218,143)
PR402	EQ652	CULLOMPTON HAZ	(199,633)
PR402	EQ722	CULLOMPTON HAZ	(5,098)
PR810	EQ728	STATUTORY DEVELOPMENT PLAN	(269,500)
PR400	EQ722	BUSINESS DEVELOPMENT	(51,640)
RB100/RB600	EQ787	NNDR NEW BURDENS	(16,950)
IT900	EQ655	IT PROJECT MANAGER	(46,863)
OS455	ER005	AMORY PARK	(10,000)
LD201	EQ720	DISTRICT ELECTIONS	(100,000)
LD300	EQ721	ELECTED MEMBERS TRAINING	(10,000)
LD201	EQ721	DISTRICT ELECTIONS	(15,000)
PH733/PH373	NEW CODE	HOMES FOR UKRAINE	(182,280)
	EQ660	Releasing of Reserves to fund the 2023/24 GF Budget	(80,722)
TOTAL			**(3,265,520)**

Net Transfer To / (From) Earmarked Reserves **(1,667,440)**

Proposed Transfer (From) NHB Reserve to Balance remaining deficit on 2023/24 Budget			
	EQ653	NHB to fund the GF Deficit	(57,657)

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Housing Revenue Account - by service

Code	Service Unit	Base Budget 2022/2023	Movement	Budget 2023/2024
		£	£	£
	Income			
SHO01	Dwelling Rents Income	(12,673,660)	(882,780)	(13,556,440)
SHO04	Non Dwelling Rents Income	(488,360)	790	(487,570)
SHO07	Leaseholders' Charges For Services	(29,000)	0	(29,000)
SHO08	Contributions Towards Expenditure	(80,920)	(109,580)	(190,500)
SHO10	H.R.A. Investment Income	(25,000)	(375,000)	(400,000)
SHO11	Miscellaneous Income	(7,000)	1,000	(6,000)
			0	
	Services		0	
SHO13A	Repairs & Maintenance	3,825,733	364,597	4,190,330
SHO17A	Housing & Tenancy Services	1,730,707	359,253	2,089,960
	Accounting entries 'below the line'		0	
SHO29	Bad Debt Provision	150,000	150,000	300,000
SHO30	Share Of Corp And Dem	173,900	(12,730)	161,170
SHO32	H.R.A. Interest Payable	1,077,320	154,960	1,232,280
SHO34	H.R.A. Trf To/From Emr	1,311,720	135,910	1,447,630
SHO37	Capital Receipts Reserve Adjustment	(20,800)	0	(20,800)
SHO38	Major Repairs Allowance	2,465,000	70,000	2,535,000
SHO45	Renewable Energy Transactions	(105,000)	(55,000)	(160,000)
	Total	**(2,695,360)**	**(198,580)**	**(2,893,940)**

Subjective analysis

Code	Best Value Unit	Base Budget 2022/2023	Movement	Draft Budget 2023/2024
1000	Employees	3,323,740	382,630	3,706,370
2000	Premises	267,900	179,440	447,340
3000	Transport	240,040	23,730	263,770
4000	Cost Of Goods And Services	6,929,300	630,190	7,559,490
7000	Income	(13,456,340)	(1,414,570)	(14,870,910)
	Total	**(2,695,360)**	**(198,580)**	**(2,893,940)**

Code	Best Value Unit	Base Budget 2021/2022	Movement	Draft Budget 2022/2023
5000	Internal Recharges	1,714,560	169,250	1,883,810
6000	Capital Charges	980,800	29,330	1,010,130
	Total	**2,695,360**	**198,580**	**2,893,940**
	Grand Total	**0**	**0**	**0**

Notes:

SHO01	Income assumption is a 7% increase for 2023/24. The increase is not 7% in real terms as the assumed Void and RTBs impact this.
SHO08	Forecast increase in rechargeable works by Building Services
SHO10	Returns on invested cash balances forecast to rise based on increased interest rates
SHO13A	**Salary** inflation assumed at 5.5% for 2023/24, additionally the pay award for 2022/23 was above the original forecast of 2%. Net of increased DLO works (a reduction to the salary base) £454k has been built on to the base salary budget **Waste/disposal** charges anticipated to increase significantly next year therefore have provided an additonal £111k to fund this **Contractor/materials** spend-provided an additional £70k to the budget, this may need to be revised further **Vehicle** costs-fuel inflation and a slight increase in the fleet lease charge £30k additional requirement
SHO17A	**Salary** inflation assumed at 5.5% for 2023/24, additionally the pay award for 2022/23 was above the original forecast of 2% therefore £144k has been built into the 2023/24 budget **Utilities** spend-due to the uncertainty around energy costs an additional £54k has been provided for **Development Programme** provision has been made for decant costs that may arise from in-year projects, £100k, additionally an increased budget for council tax charges on Housing properties that are temporarily void or held as part of the build programme, £85k
SHO29	As per the MTFP an additional £150k has been budgeted for in terms of bad/doubtful debts this is a provision to take account of the current cost of living pressures and to ensure the HRA is in a position to cope with any potential impact
SHO32	Forecast interest costs on future build programme (see Capital MTFP for details)
SHO34	Contributions to reserves: £50k towards vehicle cost sinking fund, £854k to the Loan deficit reserve, £160k to the Renewables reserve, £149k to the Affordable Rent Surplus reserve Based on the current budget forecast, a contribution to the Housing Maintenance reserve of £234k would be allowable
SHO38	This expenditure is budgeted in line with the planned Works Programme for the next year
SHO45	Expenditure forecast has been refined for 2023/24 therefore an increased contribution to the Renewable Energy reserve will be possible

Appendix 5

HRA Rent Budget 2023/24

Description	Average rent (52 week basis) £	Average properties 2023/24	Annual rent total £	Void level	Annual rent total (less voids)
Social rent (in use)	89.81	2,861	**13,362,770**	2.45%	13,035,860
Affordable rent properties	129.43	90	**605,732**	4.44%	578,810
TOTAL		**2,951**	**13,968,502**		**13,614,670**
Rent written off					(70,000)
Write-offs recovered					1,000
HO700 budget					**13,545,670**
Affordable rent surplus					**149,130**

HRA: Proposed Fees and Charges 2023/24

		2022/23	Increase	Increase %	2023/24
Garage rents per week (52 week basis)		£10.71	£0.00	0.00%	£10.71
It should be noted that council tenants receive a discount of £1.85 per week on any garage rent					
Garage ground rents	(Annual charge)	£275	£0	0.00%	£275
				(charges shown exclude any applicable VAT)	
MDDC Formula Rent on average (52 weeks)		£83.99			**£89.88**

General Fund: (Community Alarms) Proposed Fees and Charges 2023/24

	2022/23	Increase	Increase %	2023/24
Private Clients (weekly charge)	£3.47	£0.17	4.90%	£3.64
Housing tenants (weekly charge) *(applies to existing tenants formerly under sheltered housing)*	£3.05	£0.15	4.92%	£3.20
Installation charge *(new clients)*	£30.00	£10.00	33.33%	£40.00
			(charges shown exclude any applicable VAT)	

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CABINET
7 FEBRUARY 2023

Capital Strategy 2023/24 & Capital Programme 2023/24 – 2027/28

Cabinet Member Cllr Bob Deed, Leader and Cabinet Member for Finance
Responsible Officer Andrew Jarrett, Deputy Chief Executive (S151)

Reason for Report: To agree the proposed 2023/24 Capital Strategy and to seek approval of the 2023/24 Capital Programme and note the indicative Capital Programmes for 2024/25 to 2027/28.

RECOMMENDATIONS: That Cabinet recommend to Full Council:

1. **That the proposed 2023/24 Capital Strategy is approved.**
2. **To approve in principal the current estimated amounts of Slippage of £6,201k from the 2022/23 Deliverable Capital Programme and £33,231k of 2022/23 Capital Programme expenditure profiled over the life of the MTFP. This will be finalised and formal approval sought as part of 2022/23 Outturn report.**
3. **The overall Capital Programme for projects commencing in 2023/24 of £98,375k be approved and the indicative Capital Programmes across the four remaining years of this Medium Term Financial Plan covering 2024/25 to 2027/28 be noted.**
4. **To approve the 2023/24 Deliverable Budget based on the forecast spend profile of £64,826, this will include elements of amounts detailed in recommendations 2 & 3 above and will form the budget to monitor against in 2023/24, subject to any changes referred to in recommendation 2 at Outturn.**

Relationship to the Corporate Plan: A strategic approach to Asset Management supports our Corporate Plan priorities of business retention, growth and development. Maximising our return from all associated treasury activities enables the Council to support current levels of spending in accordance with our Corporate Plan. The Capital Programme identifies the capital investment proposed across all strands of the Corporate Plan over the next five years.

Financial Implications: Good financial management and administration underpins the entire strategy. The Capital Strategy sets the boundaries in which the Council's capital and treasury management functions operate. The Capital Programme submitted for 2023/24 of £98,375k is fully funded. It does, however, include £46,170k of anticipated PWLB borrowing to fund various projects. Future capital receipts are now estimated at such a low level that the Council needs to continually evaluate ways of making additional provision to fund its long-term capital programme or reduce its property portfolio. This is especially relevant due to the uncertainty around the future of New Homes Bonus and its availability as an income stream going forward.

Legal Implications: Authorities are required by regulation to prepare a Capital Strategy for each financial year that needs to be approved by Full Council prior to the start of the financial year. Authorities must also have regard to the Prudential Code when carrying out their duties under Part 1 of the Local Government Act 2003.

Risk Assessment: The S151 Officer is responsible for the administration of the financial affairs of the Council. A co-ordinated approach to Asset Management and Financial Planning will help mitigate the risks associated with holding and utilising assets. Financial risk is mitigated by sound Treasury Management practices and defined limits. There is a risk of clawback of external funds if sums received are not spent in accordance with the terms on which they were given, or not within agreed timescales. New Capital Receipts for 2023/24 have been projected at a prudent level of £1,324k but there is a risk that if these do not materialise, the Authority may need to delay scheme start dates to the following financial year or identify an alternative funding mechanism to ensure full programme delivery. Other risks, such as cashflow management are managed through the operation of the Treasury Management Strategy.

Equality Impact Assessment: Each of the capital investments will be, where appropriate, subject to an impact assessment. This is done with a view to identifying possible actions to mitigate negative impacts. However, many of the proposals do not have a direct impact on the public and therefore do not require an Impact Assessment.

Impact on Climate Change: The Council has committed to a net zero carbon policy by 2030. Any major asset replacements/upgrades will consider the environmental impact in relation to carbon footprint.

The Capital Strategy 2023/24

1. Introduction

1.1. The Capital Strategy gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services, along with an overview of how associated risk is managed and the implications for future financial sustainability.

1.2. The strategy is designed to be a user-friendly document, which can direct stakeholders to the relevant documents relating to Treasury decisions, Asset Management and the Capital Programme for the coming years. It provides a link between these activities and reiterates the need for these to be co-ordinated to support the objectives of the Corporate Plan.

1.3. This strategy brings together the statutory requirements of the Chartered Institute of Public Finance Accountants (CIPFA) and the CIPFA Prudential Code for Capital Finance in Local Authorities. There is also a strong link with the Treasury Management Strategy that provides a framework for the borrowing and lending activity of the Council.

1.4. The Capital Strategy needs to be relevant in the current financial and economic climate and therefore needs a cautious and measured, yet flexible, approach that reflects the fact that:

- The impact on the Revenue Budget arising from the Capital Investment Programme must be affordable and sustainable, and be used to aid the bottom line;
- Capital resources available to the Council are limited, with little direct funding provided from Government and currently limited scope to raise income from Capital Receipts;
- Local Government's range of responsibility is constantly changing along with the role that it plays within the community, leading to an expectation that Society will assist in the delivery of services.

1.5. The Council is required, by regulation, to publish a number of indicators relating to the Capital Investment Programme, Treasury Management and the revenue implications of the programme, known as the Prudential Indicators. This report, along with the Treasury Management Strategy, publishes those indicators, based on the assumption that Cabinet / Council will approve the proposals contained within the Revenue Budget and Capital Programme.

2. Strategic Aims

2.1. The key objective of the Capital Strategy is to deliver a Capital Programme that:

- Ensures that the Council has assets that are fit for purpose and enable the delivery of the priorities set out in the Corporate Plan;
- Supports the Council's service specific plans and strategies;
- Facilitates income generation that aids the Revenue Budget;
- Is affordable, financially prudent and sustainable.

This should not however prevent the authority from:

- Reducing the on-going liability of holding assets by engaging with communities to develop alternative service delivery options including asset transfer;
- Fully utilising resource opportunities available for Capital Investment from outside sources where this does not create ongoing revenue liabilities or commitments that cannot be met.

3. Priorities

3.1. The Council's priority areas for investment can be summarised as:

3.1.1 **Asset replacement and/or enhancement**: The services delivered by the Council depend upon a variety of assets such as Plant, Property and Equipment (PPE) or vehicles. These need to be updated/upgraded on a

regular basis to ensure service delivery is maintained or enhanced. Asset maintenance is a revenue cost; the purchase or enhancement is a capital cost.

3.1.2 **Income Generation:** The Council is looking to identify investments that generate an income to replace the lost grant funding and ease the pressure on the Revenue Budget. Specific projects / investment opportunities will be brought forward for approval by the Cabinet as they are identified.

3.1.3 **Economic Regeneration:** The Council is committed to investing in the District's future through regeneration projects. Any schemes will need to be self-financing so that borrowing costs are covered by either Grant, investment income or capital receipts leaving no ongoing impact on the Council's Revenue Budget.

3.1.4 **Invest to save**: The Council is always looking for opportunities to deliver future efficiencies in service provision, known as 'Invest to Save'. This could include investment in technology or processes. The "green" investments are a good example of this, where investment in more efficient heating systems reduces the ongoing cost of energy consumption.

3.1.5 **Health and Wellbeing:** The Council's receives the Disabled Facilities scheme, which pays for essential housing adaptations to help disabled people stay in their own homes. In the current climate, it is also important that the Council plays a wider role in the health and wellbeing of its local community.

4. Capital Expenditure and Financing

4.1. Capital expenditure is where the Council spends money on assets, such as property or vehicles that will be used for more than one year. In Local Government, this includes spending on assets owned by other bodies, or loans and grants to other bodies enabling them to buy/build assets. The Council has limited discretion on what counts as capital expenditure, for example assets costing below £20k are deemed deminimis and are not capitalised but are instead charged to revenue in-year.

4.2. The detail of our approach to capitalisation is shown in our Accounting Policies in the Statement of Accounts that are produced each year. The Audit Committee have approved the latest draft Accounts subject to some minor outstanding queries. The Accounts for the year 2021/22 can be found here:

https://www.middevon.gov.uk/your-council/finance/annual-accounts/

4.3. Service managers bid annually to include projects in the Council's Capital Programme. Bids are collated by Finance who calculate the financing cost (which can be nil if the project is fully externally financed). The relevant PDGs consider the Capital Programme and the funding thereof and can make recommendations to Cabinet and are able to. The final Capital Programme is then presented to Cabinet in February who recommend it to Full Council for approval the same month each year.

4.4. In 2023/24, the Council is requesting approval of new capital expenditure of £98,375k for projects due to start in 2023/24 as well as estimated £39,432k of expenditure approved in prior years that has slipped in timescale or was planned for future years. These projects have an expenditure profile within 2023/24 of £64,826k which forms the Deliverable Budget for the year (as detailed in Appendices 1 & 2). It can be summarised as follows:

Table 1: Prudential Indicator: Estimates of Capital Expenditure

Capital Expenditure £000	**2021/22 Actual**	**2022/23 Estimate**	**2023/24 Estimate**	**2024/25 Estimate**	**2025/26 Estimate**
General Fund Projects	3,836	5,224	17,084	23,992	2,855
HRA Projects[1]	4,196	7,446	21,634	32,574	26,705
Loans to Subsidiary Company*	3,591	9,282	26,108	11,162	14,138
Total	**11,623**	**21,952**	**64,826**	**67,728**	**43,698**

*This figure is gross loans and excludes repayments and working capital loans (which are treated as Revenue)

4.5. A summary of the projects included in the 2023/24 Capital Programme are included in paragraphs 11.5 and 11.7 below.

4.6. All capital expenditure must be financed, whether from external sources (Government grants and other contributions), the Council's own resources (Revenue, Reserves and Capital Receipts) or Debt (Borrowing, Leasing and Private Finance Initiative).

4.7. Borrowing may be internal or external:

4.7.1. **Internal borrowing** uses the cash balances of the Council. Currently, these balances yield small returns on the investment market and is therefore cheaper than the interest rate payable on an external loan and so is maximised as far as possible. This has been a significant funding source in recent years.

4.7.2. **External borrowing** is via loans. Within Local Government, the main provider for long-term borrowing has traditionally been the Public Works Loan Board [PWLB]. However, the Council also uses other organisations, such as other Local Authorities for shorter-term cash flow requirements.

4.8. An increasing number of assets are leased, such as the new vehicles within our fleet. These are normally taken through Finance Leases where the asset remains owned by the finance company, but the Council rents them.

4.9. The planned financing of the expenditure in Table 1 above is as follows:

[1] The Housing Revenue Account (HRA) is a ring-fenced account, which ensures that council housing does not subsidise, or is itself subsidised, by other local services. HRA capital expenditure is therefore recorded separately.

Table 2: Capital financing

Financing of Capital Expenditure £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Capital receipts	1,484	1,190	1,575	2,426	1,587
Capital grants	1,367	4,934	15,023	29,652	11,016
Capital reserves	0	0	0	0	0
Revenue Contributions	2,889	4,733	4,934	5,661	2,927
Borrowing	5,883	11,095	43,294	29,989	28,168
Total	**11,623**	**21,952**	**64,826**	**67,728**	**43,698**

4.10. Debt is only a temporary source of finance, as loans and leases must be repaid and is therefore replaced over time by other financing, usually from revenue, which is known as Minimum Revenue Provision (MRP). Alternatively, proceeds from selling capital assets (known as Capital Receipts) may be used to replace debt finance.

4.11. The Council's full Minimum Revenue Provision / loans fund repayments statement is shown in Appendix 1 of the Treasury Management Strategy Statement. This strategy is also included elsewhere on the meeting agenda. Planned MRP is as follows:

Table 3: Planned MRP payments

Planned MRP Payments £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
General Fund	671	689	703	898	970
Housing Revenue Account	962	976	1,010	1,196	1,309
Total	**1,633**	**1,665**	**1,713**	**2,094**	**2,279**

4.12. The Council's cumulative outstanding amount of debt finance is measured by the Capital Financing Requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP / loan repayments and capital receipts used to replace debt. The CFR is expected to increase by £25,814k during 2023/24. This increase mainly consists of £10,114k relating to projects undertaken by 3 Rivers Developments Ltd, £4,315k relating to General Fund projects associated with the Cullompton Relief Road and strategic land acquisition and £9,884k relating to other HRA projects. Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement

Capital Financing Requirement £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
General Fund Services	10,162	9,877	14,223	19,411	18,856
Council Housing (HRA)	39,603	40,580	51,934	64,400	76,626
Loans to Subsidiary Company*	11,363	20,522	30,636	15,622	14,138
Total CFR	**61,128**	**70,979**	**96,793**	**99,433**	**109,620**

** Loans to Subsidiary Company investments relate to capital expenditure on housing developments and investment properties.*

This table is cumulative including existing and future borrowing. This is reduced as and when repayments are scheduled.

4.13. At present, the Council does not charge MRP on it loans to 3 Rivers. This is because it funds assets that are under construction – to which MRP does not apply. Once the assets are complete and MRP would normally become chargeable, they are sold by 3 Rivers and the loan is repaid. However, CIPFA previously consulted on this matter to enforce MRP to be applicable on loans to third parties, despite the regulations around "assets under construction". As yet, no formal outcome of the consultation had been announced, therefore if formally implemented, it is assumed this will apply from 2024/25 at the earliest.

5. Treasury Management

5.1. Treasury Management is concerned with keeping sufficient, but not excessive cash, available to meet the Council's spending needs, while managing the risks involved. To avoid excessive credit balances or overdrafts in the bank current account, surplus cash is invested until required while a shortage of cash will be met by borrowing. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

5.2. Due to decisions taken in the past, at 31 March 2023 the Council is forecast to have £33,310k of borrowing (excluding finance leases) at an average interest rate of 2.91% and £20,000k treasury investments earning interest at an average rate of 3.63%.

5.3. **Borrowing strategy:** The Council's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in the future. These objectives are often conflicting, and the Council therefore seeks to strike a balance between cheap short-term loans (up to 1 year, mainly through other Local Authorities - currently available at around 4%) and long-term fixed rate loans where the future cost is known but higher (currently around 4.5% from PWLB[2]).

[2] As at the time of drafting this report – 26 January 2023

5.4. Projected levels of the Council's total outstanding debt (which comprises borrowing and leases) are shown below, compared with the Capital Financing Requirement.

Table 5: Prudential Indicator: Gross Debt and the Capital Financing Requirement

Gross Debt and The Capital Financing Requirement	2021/22	2022/23	2023/24	2024/25	2025/26
£000	Actual	Estimate	Estimate	Estimate	Estimate
Debt (including Leases)	37,423	35,625	45,910	50,222	59,656
Capital Financing Requirement (CFR)	61,128	70,979	96,793	99,433	109,620

5.5. Statutory guidance is that Debt should remain below the Capital Financing Requirement, except in the short-term. As can be seen from table 5, the Council expects to comply with this in 2023/24 through to 2025/26.

5.6. **Affordable borrowing limit:** The Council is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year and to keep it under review. In line with statutory guidance, a lower "Operational Boundary" is also set as a warning level should debt approach the limit. Further details on borrowing are included with the Treasury Management Strategy, which is also included elsewhere on the meeting agenda.

Table 6: Prudential Indicators: Authorised Limit and Operational Boundary for external debt

Authorised Limit and Operational Boundary for External Debt	2022/23	2023/24	2024/25	2025/26
£000	Limit	Limit	Limit	Limit
Authorised Limit	81,000	107,000	110,000	119,000
Operational Boundary	72,000	98,000	101,000	110,000

5.7. **Investment strategy:** Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of Treasury Management.

5.8. The Council's policy on treasury investments is to prioritise Security and Liquidity over Yield (SLY Principle), to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the Government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.

Further details on treasury investments is included within the Treasury Management Strategy, but can be summarised as follows[3]:

Table 7: Treasury Management investments

Treasury Management Investments £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate
Short-Term Investments	36,832	20,000	10,000
Long-Term Investments	5,000	5,000	5,000
Total	**41,832**	**25,000**	**15,000**

5.9. **Governance:** Decisions on Treasury Management investment and borrowing are made daily and are therefore delegated to the S151 (Deputy Chief Executive) and finance staff, who must act in line with the Treasury Management Strategy approved by Full Council annually. Reports on Treasury Management activity are presented to Cabinet three times per year.

6. Investments for Commercial and Economic Development Purposes

6.1. The Council makes investments to assist local public services, including making loans to other public sector bodies to promote economic development and provide an income stream. In light of the public service objective, the Council is willing to take more risk than with other treasury investments; however it is still a requirement for such investments to generate a profit after all costs, and after conducting all appropriate due diligence.

6.2. For example, during 2021/22, the Council facilitated a loan to fund a GP Surgery/NHS Hub in Crediton. Not only will this provide the Council with a return on its loan, it will also provide an important, modern NHS Hub in Crediton, replacing two existing GP Surgeries and offering further NHS services to the public.

6.3. The principal risk exposures include the timing of debt repayments; development market values; development costs and profitability of the subsidiary. These risks are managed by due diligence of business cases. Although there is no cap on the level of lending between the Authority and the subsidiary, advance approval of the level of lending is required from Cabinet before the start of each financial year, with reference to the company's Annual Business Plan.

6.4. With Central Government financial support for local public services declining and the tightening of regulations within the Prudential Code that prohibits the Council from investing primarily for financial return, the options for the Council to invest in Commercial and for Economic Development purposes is limited. However, it is able to lend to its subsidiary 3 Rivers Developments Ltd to

[3] As at the 31 March of the appropriate year

develop land and commercial income generating projects and charge interest on loans at a commercial rate.

6.5. The Council also has commercial activities in retail properties, which expose it to normal commercial risks. The over-arching ethos behind these activities is economic regeneration and retention of premises within the town centre rather than the income stream.

6.6. **Governance:** Decisions on commercial investments are made by the S151 (Deputy Chief Executive) in conjunction with the Leadership Team, in line with the criteria and limits approved by Council in the Treasury Management Strategy Statement (TMSS). Property and most other commercial investments are also capital expenditure and asset purchases will therefore also be approved alongside the capital programme.

7. Asset Management

7.1. In order to ensure the Council is allocating its resources in the most effective way, an Asset Management Plan (AMP) is maintained. It outlines where capital investment can assist the Council achieve its goals or where investment and use of resources plays a contributing role to shared priorities. Therefore the AMP helps set out the Council's approach to the Strategic Management of its land and building assets. It has been developed in consultation with the Senior Officers and Members of the Council who form the Capital Strategy Asset Management Group (CSAG). The AMP seeks to ensure that assets are used in the most effective and efficient way to support the delivery of the Corporate Plan.

7.2. The latest version of the AMP was considered and approved by Cabinet on 4 March 2021. It can be found here:

https://www.middevon.gov.uk/media/353719/supplement-revised-format-for-asset-management-and-capital-strategy-plan-04032021-v1.pdf

7.3. The AMP enables the Council to consider the best use of its assets by identifying those that require investment in planned maintenance; those that it should consider disposal of, those that could generate additional income from leasing out etc. These considerations will then inform the Capital Programme and funding decisions.

7.4. **Asset disposals:** When a capital asset is no longer needed, it may be sold so that the proceeds, known as Capital Receipts, can be spent on new assets or to repay debt. The Council expects to receive £1,324k of Capital Receipts in 2023/24 (net of Government Pooling); these are associated with the sale of Council Houses through the 'Right to Buy' scheme. Capital Receipts are summarised in the table below:

Table 8: Capital Receipts

Capital Receipts £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Asset Sales	2,519	1,163	1,324	1,324	1,324

8. Liabilities

8.1. In addition to debt of £45,910k in 2023/24 detailed in Table 5 above, the Council is committed to making future payments to cover its pension fund deficit (valued at £69,572k in 2021/22).

8.2. **Governance:** The risk of liabilities crystallising and requiring payment is monitored by Finance and Legal. Any new material liabilities would be reported to Full Council for approval/notification as appropriate.

9. Revenue Budget Implications

9.1. Although capital expenditure is not charged directly to the Revenue Budget, interest payable on loans and Minimum Revenue Provision (MRP) are charged to revenue, offset by any investment income receivable. The net annual charge is known as Capital Financing Costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, Business Rates and general Government Grants.

Table 9: Prudential Indicator: Proportion of financing costs to net revenue stream

Proportion of Financing Costs to Net Revenue Stream %	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
General Fund	0.95%	-3.55%	-4.89%	-3.14%	-3.45%
Housing Revenue Account	15.06%	12.56%	12.59%	15.63%	17.16%

*Further details on the revenue implications of capital expenditure are found in the Revenue Budget report.

9.2. **Sustainability:** Due to the very long-term nature of capital expenditure and financing, the Revenue Budget implications of capital expenditure incurred in the next few years will extend for up to 50 years into the future. The S151 (Deputy Chief Executive) is satisfied that the Council has adequate means of financing and repaying any required borrowing and therefore the proposed Capital Programme is prudent, affordable and sustainable. .

10. Knowledge and Skills

10.1. The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. For example, the S151 (Deputy Chief Executive) is a qualified accountant with 18 years' of experience and the Corporate Manager for Property, Leisure and Climate Change is experienced across the full range of Property responsibilities. In addition, the Council employs ten finance staff who hold one or more of the following qualifications CIPFA, ACA, CIMA, ACCA and AAT.

10.2. To support those staff, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Link Group as treasury management advisers and Ichabod Industries as technical advisers on accountancy matters. This approach is more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

The Capital Programme 2023/24 and Capital Medium Term Financial Plan (CMTFP)

11. The Capital Programme 2023/24

11.1. The 2023/24 programme includes significant new investment into Council House building projects and future years indicative programmes include 'spend to save' projects improving the energy efficiency of our property estate that will only be undertaken if the Council is successful in securing sufficient external funding and is accompanied by a robust business case that demonstrates an acceptable payback.

11.2. There is also projected slippage detailed on the appendices from 2022/23, relating to the 2022/23 Deliverable Programme currently estimated to be £6,201k that will roll into the 2023/24 Capital Programme. In addition there is £33,231k within the 2022/23 Capital Programme with spend profiled over future years. Both these are detailed in recommendation 2 and are estimates at this stage. The approval of final figures will be sought as part of the Outturn Report to either add to the 2023/24 Capital Programme or relevant year of the CMTFP.

11.3. Full project approval is now requested at project inception, for 2023/24 this amounts to £98,375k. This is then profiled by spending managers as their best estimate of when spending will take place to form the Deliverable Budget of £64,826k. This gives a better indication of what is deliverable each year and will better inform our Treasury Management activities.

11.4. **Appendix 1** shows the proposed 2023/24 Capital Programme, which totals £98,375k. The Deliverable Budget includes the proportion of expected spend within the 2023/24 Capital Programme and the estimated slippage and profiled

spend of the 2022/23 Capital Budget forecast to be spent in 2023/24. This is the value that will be monitored against in-year.

11.5. **Appendix 2** shows the detailed schemes in the General Fund and the HRA that reflect the spending aspirations summarised in **Appendix 1** and the table below:

Table 10: 2023/24 Capital Programme (based on project inception)

General Fund Projects	**Expenditure 2023/24 £000's**
Leisure Schemes	622
Leisure - Climate Change/Net Zero	396
Phoenix House	133
Cullompton Relief Road	18,030
Private Sector Housing	525
ICT Projects	460
Other General Fund Development Projects	12,196
General Fund Subtotals	**32,362**
HRA Projects	**Expenditure 2023/24 £000's**
Existing Housing Stock	2,990
Housing Schemes (1:4:1 Projects)	5,066
Housing Development Schemes (HE)	42,200
Other HRA Projects	15,757
HRA Subtotals	**66,013**
Grand Totals	**98,375**

11.6. **Appendices 1 and 2** also show the updated indicative Capital Programme for the remaining years within this CMTFP, refreshed with up to date information on expenditure and funding. These projections are likely to alter, as we get closer to those years as greater information becomes available. Therefore, only the Capital Programme for 2023/24 is proposed for approval; the indicative future years are only for information and noting.

11.7. General Fund Investment.

11.7.1. Within the investment in our Leisure Service, there are a number of projects ranging from investment in new equipment to maintain a competitive service offering; together with improvement to disabled toilet facilities that is reliant on external grant. A spend to save project is also included to improve self-service access for the customer and reduce future staffing requirements. There is also a project at Culm Valley Sports Centre that will help the Council deliver its commitment to climate change and reducing carbon emissions. It is anticipated that external funding will assist with the funding of this bid, with a contribution also from MDDC.

11.7.2. There is an assumption included in respect of the Cullompton Relief Road. Currently, funding has been secured to cover the initial projected estimated cost of this project. However, costs have dramatically increased since that funding was received. Therefore, the Council submitted a bid to the Levelling Up Fund to cover the forecast difference for the Cullompton project. This bid was rejected on 19/01/23 and currently other forms of funding are actively being sought to enable this project to be delivered.

11.7.3. Further investment within our ICT assets is required to enable the Council to update its infrastructure, including upgrading servers and audio-visual equipment within Phoenix House. In addition, the planned refresh of staff laptops and associated devices will continue. This will be completed in a phased roll out to ensure that the cost is spread over a number of years.

11.7.4. As in previous years, the Disabled Facilities Grant funding will be used to improve homes across the district that will enable residents with health problems to remain in their homes, therefore avoiding or delaying the need for them to enter the health care system.

11.7.5. The Capital Programme for 2023/24 includes further 3 Rivers Projects in line with their draft Business Plan. This is in addition to the slippage to projects approved in prior years. Cabinet will give further consideration to the Business Plan after this report has been published.

11.8. Housing Revenue Account Investment

11.8.1. A number of projects to enhance the quality of our existing housing stock (a programme of £2,990k) are undertaken each year through the planned maintenance scheme. In 2023/24, provision has been made to invest in garage refurbishments, replace roofing, windows and doors in properties where required, along with general modernisation works, including updating heating systems.

11.8.2. Significant new investment of £47,266k is planned to deliver new housing within the district predominantly through highly efficient (zero carbon) modular buildings. To fund the proposed Housing Development Schemes, a prudent assumption has been included for the utilisation of 1-4-1 receipts or for additional grant funding to be made available from Homes England and One Public Estate Funding; although a substantial element of the cost remains with the Council. In total, £21,624k is assumed to be secured from 1-4-1 receipts or external grant funding, leaving £23,718k to be funded by borrowing and the remaining £1,924k from existing reserves. The investment in Other HRA projects includes the development of Post Hill in Tiverton.

11.9. A significant amount of work was undertaken when producing the Council's Capital Medium Term Financial Plan (CMTFP) during the year, which helped to scope the size and funding of the 2023/24 Capital Programme. A number of subsequent meetings were held with Corporate Managers, which focused on the essential projects (in terms of end of life asset replacement or health and safety) and involved reprioritising or rescheduling expenditure to future years

12. Funding the Capital Programme

12.1. The 2023/24 Capital Programme is fully funded by a combination of:

Table 11: 2023/24 Capital Programme Funding (based on project inception)

General Fund Projects - Funding Sources	Funding 2023/24 £000's
Funding from Revenue EMR's	465
Funding from Government Grants	18,973
Usable Capital Receipts	229
Borrowing	12,695
General Fund Subtotals	**32,362**
HRA Projects - Funding Sources	**Funding 2023/24 £000's**
S106 (Revenue) Contributions	1,000
MRA Reserve	2,435
Funding from Revenue EMR's	475
Funding from Government Grants	26,005
Usable Capital Receipts	1,004
UCR 1:4:1 Replacement Homes	1,619
Borrowing	33,475
HRA Subtotals	**66,013**
Grand Totals	**98,375**

12.2. The projected level of usable capital receipts (this includes unringfenced useable capital receipts and capital receipts ringfenced for 1:4:1 replacement homes) available for 2023/24 is £1,324k. All other previously generated capital receipts have been used to balance the subsequent years of the MTFP. This only enables a small number of Council funded schemes to be incorporated into the Capital Programme. The figures assumed for receipts from the sale of assets have been calculated prudently and therefore if any additional receipts are generated, the Council could reduce the need for external borrowing, or return to some of the projects which could not be funded in the first instance and consider their inclusion. Any decision to increase the Capital Programme (subject to constraints within the financial rules) would require Full Council approval and be linked to the Corporate Plan priorities.

12.3. The Government Pooling arrangements mean a proportion of the Council House sale proceeds are pooled to the Government; a proportion is retained in a ring-fenced reserve for replacement house building (linked to the HRA self-financing arrangements that have been in place since 01/04/12). The balance is retained by the Authority as a useable capital receipt, which can be used to support our Capital Programme.

12.4. The programme of £2,990k identified to maintain our existing council house stock will be funded mainly from the Major Repairs Reserve (MMR). The balance of available monies will remain in the MMR in order to deal with future additional spend that has been identified by the stock condition survey.

12.5. The Council continues to set aside sinking funds for future asset maintenance, replacement of Leisure plant and equipment and for future replacement of ICT systems and equipment. This ensures the Revenue base budget is more robust. However, given the pressure on its finances, the Council will need to assess whether this remains affordable, or whether alternative options should be explored.

13. Council Borrowing

13.1. Prudential borrowing has been estimated for 2023/24 at £46,170k, this will be used to fund General Fund schemes amounting to £12,695k and HRA schemes amounting to £33,475k. All schemes will be subject to a rigorous business case assessment; their cost and timing of spend will determine the amount of actual prudential borrowing required. The use of internal borrowing will be applied wherever possible.

13.2. New Borrowing is also envisaged across the remainder of this MTFP i.e. 2024-25 to 2027-28 amounting to £56,217k (excluding those projects being rolled forward from the already approved 2022/23 Capital Programme); of this £47,645k will be used to deliver General Fund projects and £8,572k to deliver HRA projects.

13.3. Borrowing will be supported or supplemented with short and medium term Treasury Management decisions based on prevailing and future interest rates and will only be considered in exceptional circumstances. This is in relation to the projects detailed above or for spend to save projects following a robust cost/benefit analysis exercise that would be able to demonstrate both an acceptable ’payback period’ and that savings would be generated in excess of the annual revenue cost of servicing the debt.

14. Conclusion

14.1. As previously mentioned, the Capital Programme for the next five years is limited due to the scarce availability of funding (with the exception of borrowing). It is, therefore, imperative that capital funds are only spent on those projects that enable the Council to deliver its Corporate Plan objectives, reduce operational cost, or generate a financial return.

14.2. The Capital Programme encompasses a broad range of expenditure including operational assets, which will be used for more than one year; assets owned by other bodies, or loans and grants to other bodies enabling them to buy/build assets.

14.3. Funding for this programme includes significant borrowing. The Council's borrowing will be affordable, sustainable and prudent and consideration will be given to the management of interest rate risk and refinancing risk. The source from which the borrowing is taken, and the type of borrowing should allow the Council transparency and control over its debt.

14.4. The Treasury Management Strategy Statement details the approach that the Council will take in ensuring it has sufficient cash available to meet the Council's spending needs. Reports on Treasury Management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, a mid-year review, and an annual report after its close, will be taken to Full Council via the Cabinet.

Contact for more information:	Andrew Jarrett, Deputy Chief Executive (S151) 01884 234242 (ajarrett@middevon.gov.uk) Paul Deal, Corporate Manager for Financial Services pdeal@middevon.gov.uk
Circulation of the Report	Leadership Team, Cabinet
Background Papers:	November and January Cabinet and PDG's (MTFP, Budget Draft and Budget Update reports) and Capital Bid Submissions

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Appendix 1

Capital Expenditure Summary		To be rolled f/wd from 22/23		Total Project Costs for Approval							Spend Profile						
Area	Sub Area	Forecast Slippage from 22/23 to be C/fwd to 2023/24 £000's	Forecast Budget from 22/23 to be spent over life of MTFP £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Total £000's	Grand Total £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Beyond 2028/29 £000's	Total £000's
Leisure	Exe Valley Leisure Centre	-	-	83	250	-	-	-	**333**	**333**	83	250	-	-	-	-	**333**
Leisure	Lords Meadow Leisure Centre	40	80	243	-	-	200	-	**443**	**563**	363	-	-	200	-	-	**563**
Leisure	Culm Valley Sports Centre	-	404	96	360	-	-	-	**456**	**860**	96	764	-	-	-	-	**860**
Leisure	Leisure - Other	-	-	200	-	-	-	-	**200**	**200**	200	-	-	-	-	-	**200**
Leisure	Leisure - Climate Change/Net Zero	-	-	396	-	260	400	-	**1,056**	**1,056**	396	-	260	400	-	-	**1,056**
Other MDDC Buildings	Other - Climate Change/Net Zero	10	1,200	-	815	-	240	-	**1,055**	**2,265**	10	2,015	-	240	-	-	**2,265**
Other MDDC Buildings	Phoenix House	20	30	133	-	150	-	-	**283**	**333**	183	-	150	-	-	-	**333**
Other MDDC Buildings	MDDC Depots	-	1,250	-	3,500	-	-	-	**3,500**	**4,750**	1,000	3,750	-	-	-	-	**4,750**
Other MDDC Buildings	MDDC Shops/Industrial Units	150	537	-	-	-	-	-	**-**	**687**	257	430	-	-	-	-	**687**
Other MDDC Buildings	Public Conveniences	-	-	-	285	-	-	-	**285**	**285**	-	100	185	-	-	-	**285**
HIF	HIF Schemes	3,608	8,008	18,030	-	-	-	-	**18,030**	**29,646**	13,105	15,041	1,500	-	-	-	**29,646**
Private Sector Housing	Private Sector Housing	-	-	525	550	575	600	625	**2,875**	**2,875**	525	550	575	600	625	-	**2,875**
Other	General Car Parks	20	60	-	-	-	-	-	**-**	**80**	80	-	-	-	-	-	**80**
Other	Parks & Play Areas	35	-	-	-	-	-	-	**-**	**35**	35	-	-	-	-	-	**35**
Other	ICT Projects	184	-	460	150	185	160	540	**1,495**	**1,679**	644	150	185	160	540	-	**1,679**
Other	Other Projects	40	179	-	830	-	-	-	**830**	**1,049**	107	942	-	-	-	-	**1,049**
Other GF Development Projects	Other General Fund Development Projects	1,116	12,796	12,196	11,162	14,138	9,304	7,953	**54,753**	**68,665**	26,108	11,162	14,138	9,304	7,953	-	**68,665**
General Fund Subtotals		**5,223**	**24,544**	**32,362**	**17,902**	**15,308**	**10,904**	**9,118**	**85,594**	**115,361**	**43,192**	**35,154**	**16,993**	**10,904**	**9,118**	**-**	**115,361**
HRA Projects	Existing Housing Stock	175	-	2,990	3,035	2,860	2,885	2,770	**14,540**	**14,715**	3,165	3,035	2,860	2,885	2,770	-	**14,715**
HRA Projects	Housing Schemes (1:4:1 Projects)	35	271	5,066	1,700	2,500	400	-	**9,666**	**9,972**	2,429	3,113	1,780	2,290	360	-	**9,972**
HRA Projects	Housing Development Schemes (HE)	393	4,073	42,200	4,400	10,700	-	-	**57,300**	**61,766**	13,226	17,720	13,110	17,710	-	-	**61,766**
HRA Projects	Other HRA Projects	375	4,343	15,757	-	-	-	-	**15,757**	**20,475**	2,814	8,706	8,955	-	-	-	**20,475**
HRA Subtotals		**978**	**8,687**	**66,013**	**9,135**	**16,060**	**3,285**	**2,770**	**97,263**	**106,928**	**21,634**	**32,574**	**26,705**	**22,885**	**3,130**	**-**	**106,928**
Grand Totals		**6,201**	**33,231**	**98,375**	**27,037**	**31,368**	**14,189**	**11,888**	**182,857**	**222,289**	**64,826**	**67,728**	**43,698**	**33,789**	**12,248**	**-**	**222,289**

Capital Funding Summary		To be rolled f/wd from 22/23		Total Funding							Funding Profile						
Funding Type	Funding Description	Forecast Slippage from 22/23 to be C/fwd to 2023/24 £000's	Forecast Budget from 22/23 to be spent over life of MTFP £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Total £000's	Grand Total £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Beyond 2028/29 £000's	Total £000's
Revenue	RCCO - From Revenue EMR's - Other	-	67	-	-	-	-	-	-	**67**	67	-	-	-	-	-	**67**
Revenue	RCCO - From Revenue EMR's - Econ Development	10	60	-	-	-	-	-	-	**70**	10	60	-	-	-	-	**70**
Revenue	RCCO - From Revenue EMR's - ICT	110	-	435	-	25	-	30	**490**	**600**	545	-	25	-	30	-	**600**
Revenue	RCCO - From Revenue EMR's - Capital	40	50	30	30	-	-	-	**60**	**150**	72	78	-	-	-	-	**150**
Revenue	RCCO - From Revenue EMR's - Waste Infrastructure EMR	-	250	-	1,000	-	-	-	**1,000**	**1,250**	-	1,250	-	-	-	-	**1,250**
Revenue	New Homes Bonus	211	782	-	-	-	-	-	-	**993**	338	655	-	-	-	-	**993**
Capital Grants	Capital Grants Unapplied - DCC	20	-	-	215	-	-	-	**215**	**235**	20	215	-	-	-	-	**235**
Capital Grants	Govt Grant (DCLG passported from DCC)	-	-	525	550	575	600	625	**2,875**	**2,875**	525	550	575	600	625	-	**2,875**
Capital Grants	DCC Funding - HIF Project	-	153	1,347	-	-	-	-	**1,347**	**1,500**	153	-	1,347	-	-	-	**1,500**
Capital Grants	Salix Round 3b Funding	-	-	265	-	-	-	-	**265**	**265**	265	-	-	-	-	-	**265**
Capital Grants	HIF Funding	1,712	-	5,144	-	-	-	-	**5,144**	**6,856**	3,201	3,655	-	-	-	-	**6,856**
Capital Grants	Govt Grants - Levelling - up Funding	1,896	4,540	11,539	-	-	-	-	**11,539**	**17,975**	6,436	11,386	153	-	-	-	**17,975**
Capital Grants	Salix Funding or Equivalent	-	-	-	815	260	640	-	**1,715**	**1,715**	-	815	260	640	-	-	**1,715**
Capital Grants	DLUHC - Changing Places Fund bid	-	-	153	-	-	-	-	**153**	**153**	153	-	-	-	-	-	**153**
Capital Receipts	Usable Capital Receipts	108	83	229	150	-	72	-	**451**	**642**	407	163	-	72	-	-	**642**
Borrowing	Borrowing 3 Yrs	1,116	12,796	12,221	11,462	14,298	9,464	8,463	**55,908**	**69,820**	26,133	11,462	14,298	9,464	8,463	-	**69,820**
Borrowing	Borrowing 5 Yrs	-	-	103	-	150	-	-	**253**	**253**	103	-	150	-	-	-	**253**
Borrowing	Borrowing 10 Yrs	-	3,315	371	895	-	128	-	**1,394**	**4,709**	3,686	895	-	128	-	-	**4,709**
Borrowing	Borrowing 25 Yrs	-	1,448	-	-	-	-	-	-	**1,448**	78	1,370	-	-	-	-	**1,448**
Borrowing	Borrowing 50 Yrs	-	1,000	-	2,785	-	-	-	**2,785**	**3,785**	1,000	2,600	185	-	-	-	**3,785**
General Fund Subtotals		**5,223**	**24,544**	**32,362**	**17,902**	**15,308**	**10,904**	**9,118**	**85,594**	**115,361**	**43,192**	**35,154**	**16,993**	**10,904**	**9,118**	**-**	**115,361**
Revenue	S106 (Revenue) Contributions	-	-	1,000	-	-	-	-	**1,000**	**1,000**	200	800	-	-	-	-	**1,000**
Revenue	MRA Reserve	175	-	2,435	2,475	2,295	2,315	2,195	**11,715**	**11,890**	2,610	2,475	2,295	2,315	2,195	-	**11,890**
Revenue	RCCO - From HRA Revenue EMR's - Other	25	-	-	-	-	-	-	-	**25**	25	-	-	-	-	-	**25**
Revenue	RCCO - From HRA Revenue EMR's - Renewable Energy	-	-	250	250	250	250	250	**1,250**	**1,250**	250	250	250	250	250	-	**1,250**
Revenue	RCCO - From HRA Revenue EMR's - Afford Rents Surplus	148	-	225	225	225	224	-	**899**	**1,047**	373	93	357	24	200	-	**1,047**
Revenue	RCCO - From HRA Revenue EMR's - HMF	384	60	-	-	-	-	-	-	**444**	444	-	-	-	-	-	**444**
Capital Grants	Capital Grants Unapplied - S106 Afford Housing	-	-	-	-	-	-	-	-	**-**	-	-	-	-	-	-	**-**
Capital Grants	Government Grants - Homes England Funding	52	1,818	22,720	1,080	4,815	-	-	**28,615**	**30,485**	4,030	9,986	8,501	7,968	-	-	**30,485**
Capital Receipts	Usable Capital Receipts	43	-	1,004	1,009	1,015	320	325	**3,673**	**3,716**	550	1,024	891	926	325	-	**3,716**
Capital Receipts	UCR 1:4:1 Replacement Homes	14	156	1,619	680	1,000	160	-	**3,459**	**3,629**	618	1,239	696	916	160	-	**3,629**
Capital Grants	One Public Estate Funding	-	-	3,285	180	1,140	-	-	**4,605**	**4,605**	240	3,045	180	1,140	-	-	**4,605**
Borrowing	Borrowing 25 Yrs	50	-	-	-	-	-	-	-	**50**	50	-	-	-	-	-	**50**
Borrowing	Borrowing 50 Yrs	87	6,653	33,475	3,236	5,320	16	-	**42,047**	**48,787**	12,244	13,662	13,535	9,346	-	-	**48,787**
HRA Subtotals		**978**	**8,687**	**66,013**	**9,135**	**16,060**	**3,285**	**2,770**	**97,263**	**106,928**	**21,634**	**32,574**	**26,705**	**22,885**	**3,130**	**-**	**106,928**
Grand Totals		**6,201**	**33,231**	**98,375**	**27,037**	**31,368**	**14,189**	**11,888**	**182,857**	**222,289**	**64,826**	**67,728**	**43,698**	**33,789**	**12,248**	**-**	**222,289**

Appendix 2

Area	Sub Area	Project Title	To be rolled f/wd from 22/23		Total Project Costs for Approval							Spend Profile						
			Forecast Slippage from 22/23 to be C/fwd to 2023/24 £000's	Forecast Budget from 22/23 to be spent over life of MTFP £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Total £000's	Grand Total £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Beyond 2028/29 £000's	Total £000's
General Fund																		
Leisure	Lords Meadow Leisure Centre	Reception infrastructure	40	80	40	-	-	-	-	**40**	**160**	160	-	-	-	-	-	**160**
Leisure	Culm Valley Sports Centre	CVSC - Remodelling of Ground Floor	-	174	-	-	-	-	-	**-**	**174**	-	174	-	-	-	-	**174**
Leisure	Culm Valley Sports Centre	CVSC - Sports Hall Ceiling asset review	-	230	-	-	-	-	-	**-**	**230**	-	230	-	-	-	-	**230**
Other MDDC Buildings	Other - Climate Change/Net Zero	Hydromills Electricity generation Project - Tiverton Weir	10	1,200	-	-	-	-	-	**-**	**1,210**	10	1,200	-	-	-	-	**1,210**
Other MDDC Buildings	Phoenix House	Etarmis - Security Swipe - (linked to security project)	20	30	30	-	-	-	-	**30**	**80**	80	-	-	-	-	-	**80**
Other MDDC Buildings	MDDC Depots	Land acquisition for operational needs	-	1,000	-	-	-	-	-	**-**	**1,000**	1,000	-	-	-	-	-	**1,000**
Other MDDC Buildings	MDDC Depots	Depot Design & Build - Waste & Recycling	-	250	-	-	-	-	-	**-**	**250**	-	250	-	-	-	-	**250**
Other MDDC Buildings	MDDC Shops/Industrial Units	Market Walk Unit 17 - remodelling options	60	430	-	-	-	-	-	**-**	**490**	60	430	-	-	-	-	**490**
Other MDDC Buildings	MDDC Shops/Industrial Units	36 & 38 Fore Street including Flat above structure & cosmetic works	90	107	-	-	-	-	-	**-**	**197**	197	-	-	-	-	-	**197**
HIF	HIF Schemes	CA719 Cullompton Town Centre Relief Road (HIF)	3,608	8,008	18,030	-	-	-	-	**18,030**	**29,646**	13,105	15,041	1,500	-	-	-	**29,646**
Other	General Car Parks	West Exe South - Remodelling - additional parking spaces	20	60	-	-	-	-	-	**-**	**80**	80	-	-	-	-	-	**80**
Other	Parks & Play Areas	Open Space Infrastructure (incl Play Areas)	35	-	-	-	-	-	-	**-**	**35**	35	-	-	-	-	-	**35**
Other	ICT Projects	Server farm expansion/upgrades	74	-	-	-	-	-	-	**-**	**74**	74	-	-	-	-	-	**74**
Other	ICT Projects	Secure WIFI Replacement	60	-	-	-	-	-	-	**-**	**60**	60	-	-	-	-	-	**60**
Other	ICT Projects	Network Switch/Firewall Refresh (all sites except P/House)	50	-	-	-	-	-	-	**-**	**50**	50	-	-	-	-	-	**50**
Other	Other Projects	Fire Dampeners - Corporate sites	20	-	-	-	-	-	-	**-**	**20**	20	-	-	-	-	-	**20**
Other	Other Projects	Land drainage flood defence schemes - St Marys Hemyock	-	50	-	-	-	-	-	**-**	**50**	-	50	-	-	-	-	**50**
Other	Other Projects	Land drainage flood defence schemes - Ashleigh Park Bampton	20	67	-	-	-	-	-	**-**	**87**	87	-	-	-	-	-	**87**
Other	Other Projects	Cemetery Lodge - Structural solution for damp	-	62	-	-	-	-	-	**-**	**62**	-	62	-	-	-	-	**62**
Other GF Development P	Other General Fund Development Projects	3 Rivers Schemes - Funding envelope	1,116	12,796	12,196	11,162	14,138	9,304	7,953	**54,753**	**68,665**	26,108	11,162	14,138	9,304	7,953	-	**68,665**
Leisure	Exe Valley Leisure Centre	Spin bikes	-	-	32	-	-	-	-	**32**	**32**	32	-	-	-	-	-	**32**
Leisure	Exe Valley Leisure Centre	Leisure - Improved Disabled Toilet facilities	-	-	51	-	-	-	-	**51**	**51**	51	-	-	-	-	-	**51**
Leisure	Lords Meadow Leisure Centre	Fitness Studio renewal of equipment	-	-	125	-	-	-	-	**125**	**125**	125	-	-	-	-	-	**125**
Leisure	Lords Meadow Leisure Centre	Spin bikes including environment improvements	-	-	32	-	-	-	-	**32**	**32**	32	-	-	-	-	-	**32**
Leisure	Lords Meadow Leisure Centre	Leisure - Improved Disabled Toilet facilities	-	-	46	-	-	-	-	**46**	**46**	46	-	-	-	-	-	**46**
Leisure	Culm Valley Sports Centre	Spin Bikes	-	-	40	-	-	-	-	**40**	**40**	40	-	-	-	-	-	**40**
Leisure	Culm Valley Sports Centre	Leisure - Improved Disabled Toilet facilities	-	-	56	-	-	-	-	**56**	**56**	56	-	-	-	-	-	**56**
Leisure	Leisure - Other	All leisure sites replacement management/site access system (Hardware Element)	-	-	200	-	-	-	-	**200**	**200**	200	-	-	-	-	-	**200**
Leisure	Leisure - Climate Change/Net Zero	CVSC -Phase 3B Salix funding energy saving	-	-	396	-	-	-	-	**396**	**396**	396	-	-	-	-	-	**396**
Other MDDC Buildings	Phoenix House	Building Mgmt System for Heating Control	-	-	103	-	-	-	-	**103**	**103**	103	-	-	-	-	-	**103**
Private Sector Housing	Private Sector Housing	DFG and other private sector grants	-	-	525	550	575	600	625	**2,875**	**2,875**	525	550	575	600	625	-	**2,875**
Other	ICT Projects	Server hardware/software Citrix Replacement	-	-	50	-	-	-	60	**110**	**110**	50	-	-	-	60	-	**110**
Other	ICT Projects	VM/Storage Area Network	-	-	120	-	-	-	140	**260**	**260**	120	-	-	-	140	-	**260**
Other	ICT Projects	UPS Replacements	-	-	20	-	25	-	30	**75**	**75**	20	-	25	-	30	-	**75**
Other	ICT Projects	Laptop/Desktop Refresh	-	-	150	150	160	160	170	**790**	**790**	150	150	160	160	170	-	**790**
Other	ICT Projects	Audio/Video replacement for Phoenix House	-	-	120	-	-	-	140	**260**	**260**	120	-	-	-	140	-	**260**
Leisure	Exe Valley Leisure Centre	ATP replacement (50% share with DCC)	-	-	-	220	-	-	-	**220**	**220**	-	220	-	-	-	-	**220**
Leisure	Exe Valley Leisure Centre	CHP -Replacement future energy saving project	-	-	-	30	-	-	-	**30**	**30**	-	30	-	-	-	-	**30**
Leisure	Culm Valley Sports Centre	ATP replacement (50% share with DCC)	-	-	-	210	-	-	-	**210**	**210**	-	210	-	-	-	-	**210**
Leisure	Culm Valley Sports Centre	Fitness Studio renewal of equipment	-	-	-	150	-	-	-	**150**	**150**	-	150	-	-	-	-	**150**
Other MDDC Buildings	Other - Climate Change/Net Zero	All Fleet - Vehicle live monitoring for CO2 emissions	-	-	-	115	-	-	-	**115**	**115**	-	115	-	-	-	-	**115**
Other MDDC Buildings	Other - Climate Change/Net Zero	Phoenix House - Air Source Heat pumps & ducting	-	-	-	450	-	-	-	**450**	**450**	-	450	-	-	-	-	**450**
Other MDDC Buildings	Other - Climate Change/Net Zero	MSCP -Solar carport and additional security	-	-	-	170	-	-	-	**170**	**170**	-	170	-	-	-	-	**170**
Other MDDC Buildings	Other - Climate Change/Net Zero	MSCP Additional electric car charging points	-	-	-	80	-	-	-	**80**	**80**	-	80	-	-	-	-	**80**
Other MDDC Buildings	MDDC Depots	Depot Build - Waste & Recycling	-	-	-	3,500	-	-	-	**3,500**	**3,500**	-	3,500	-	-	-	-	**3,500**
Other MDDC Buildings	Public Conveniences	Phoenix Lane Toilets - new construction in fresh position - funding options to be pursued	-	-	-	125	-	-	-	**125**	**125**	-	50	75	-	-	-	**125**
Other MDDC Buildings	Public Conveniences	Westexe Rec Toilets - Replacement	-	-	-	160	-	-	-	**160**	**160**	-	50	110	-	-	-	**160**
Other	Other Projects	Tiverton Market Paving - Permanent Solution	-	-	-	200	-	-	-	**200**	**200**	-	200	-	-	-	-	**200**
Other	Other Projects	Baler	-	-	-	480	-	-	-	**480**	**480**	-	480	-	-	-	-	**480**
Other	Other Projects	PDA's for cabs	-	-	-	150	-	-	-	**150**	**150**	-	150	-	-	-	-	**150**
Leisure	Leisure - Climate Change/Net Zero	EVLC - Building Fabric - Insulation improvements	-	-	-	-	260	-	-	**260**	**260**	-	-	260	-	-	-	**260**
Other MDDC Buildings	Phoenix House	Cooling options Air Handing Unit	-	-	-	-	150	-	-	**150**	**150**	-	-	150	-	-	-	**150**
Leisure	Lords Meadow Leisure Centre	ATP replacement (no dual use)	-	-	-	-	-	200	-	**200**	**200**	-	-	-	200	-	-	**200**
Leisure	Leisure - Climate Change/Net Zero	LMLC -Building Fabric -Insulation improvements	-	-	-	-	-	200	-	**200**	**200**	-	-	-	200	-	-	**200**
Leisure	Leisure - Climate Change/Net Zero	CVSC-Building Fabric -Insulation improvements	-	-	-	-	-	200	-	**200**	**200**	-	-	-	200	-	-	**200**
Other MDDC Buildings	Other - Climate Change/Net Zero	MDDC commercial property building fabric improvements	-	-	-	-	-	240	-	**240**	**240**	-	-	-	240	-	-	**240**
General Fund Subtotals			**5,223**	**24,544**	**32,362**	**17,902**	**15,308**	**10,904**	**9,118**	**85,594**	**115,361**	**43,192**	**35,154**	**16,993**	**10,904**	**9,118**	**-**	**115,361**

Area	Sub Area	Project Title	To be rolled f/wd from 22/23		Total Project Costs for Approval							Spend Profile						
			Forecast Slippage from 22/23 to be C/fwd to 2023/24 £000's	Forecast Budget from 22/23 to be spent over life of MTFP £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Total £000's	Grand Total £000's	2023/24 £000's	2024/25 £000's	2025/26 £000's	2026/27 £000's	2027/28 £000's	Beyond 2028/29 £000's	Total £000's
HRA			-	-														
HRA Projects	Existing Housing Stock	Decent Homes	175	-	860	905	730	755	780	**4,030**	**4,205**	1,035	905	730	755	780	-	**4,205**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 4	-	16	189	-	-	-	-	**189**	**205**	205	-	-	-	-	-	**205**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 1	35	-	10	-	-	-	-	**10**	**45**	45	-	-	-	-	-	**45**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 3	-	105	1,387	-	-	-	-	**1,387**	**1,492**	1,492	-	-	-	-	-	**1,492**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 29	-	150	950	-	-	-	-	**950**	**1,100**	110	990	-	-	-	-	**1,100**
HRA Projects	Housing Development Schemes (HE)	Project 15	16	515	4,210	-	-	-	-	**4,210**	**4,741**	4,741	-	-	-	-	-	**4,741**
HRA Projects	Housing Development Schemes (HE)	Project 18	4	851	200	-	-	-	-	**200**	**1,055**	1,055	-	-	-	-	-	**1,055**
HRA Projects	Housing Development Schemes (HE)	Project 10	10	118	1,505	-	-	-	-	**1,505**	**1,633**	1,633	-	-	-	-	-	**1,633**
HRA Projects	Housing Development Schemes (HE)	Project 14	9	751	200	-	-	-	-	**200**	**960**	960	-	-	-	-	-	**960**
HRA Projects	Housing Development Schemes (HE)	Project 9	6	122	1,105	-	-	-	-	**1,105**	**1,233**	1,233	-	-	-	-	-	**1,233**
HRA Projects	Housing Development Schemes (HE)	Project 11	10	1,416	400	-	-	-	-	**400**	**1,826**	1,826	-	-	-	-	-	**1,826**
HRA Projects	Housing Development Schemes (HE)	Project 8	60	300	2,240	-	-	-	-	**2,240**	**2,600**	60	2,540	-	-	-	-	**2,600**
HRA Projects	Housing Development Schemes (HE)	Modular Housing - Shapland Place, Tiverton	278	-	-	-	-	-	-	**-**	**278**	278	-	-	-	-	-	**278**
HRA Projects	Other HRA Projects	Post Hill, Tiverton	-	4,243	15,757	-	-	-	-	**15,757**	**20,000**	2,339	8,706	8,955	-	-	-	**20,000**
HRA Projects	Other HRA Projects	Garages Block - Redevelopment	300	-	-	-	-	-	-	**-**	**300**	300	-	-	-	-	-	**300**
HRA Projects	Other HRA Projects	Old Road Depot remodelling options - forecast expenditure to maintain operations	50	-	-	-	-	-	-	**-**	**50**	50	-	-	-	-	-	**50**
HRA Projects	Other HRA Projects	Queensway (Beech Road) Tiverton (3 units)	-	100	-	-	-	-	-	**-**	**100**	100	-	-	-	-	-	**100**
HRA Projects	Other HRA Projects	Sewerage Treatment Works - Washfield	25	-	-	-	-	-	-	**-**	**25**	25	-	-	-	-	-	**25**
HRA Projects	Existing Housing Stock	Garage Mods	-	-	150	150	150	150	-	**600**	**600**	150	150	150	150	-	-	**600**
HRA Projects	Existing Housing Stock	Roofing	-	-	600	600	600	600	600	**3,000**	**3,000**	600	600	600	600	600	-	**3,000**
HRA Projects	Existing Housing Stock	Fire Safety	-	-	50	40	30	20	20	**160**	**160**	50	40	30	20	20	-	**160**
HRA Projects	Existing Housing Stock	Window/Doors	-	-	400	400	400	400	400	**2,000**	**2,000**	400	400	400	400	400	-	**2,000**
HRA Projects	Existing Housing Stock	Heating	-	-	375	380	385	390	395	**1,925**	**1,925**	375	380	385	390	395	-	**1,925**
HRA Projects	Existing Housing Stock	Renewables	-	-	250	250	250	250	250	**1,250**	**1,250**	250	250	250	250	250	-	**1,250**
HRA Projects	Existing Housing Stock	Adaptations	-	-	305	310	315	320	325	**1,575**	**1,575**	305	310	315	320	325	-	**1,575**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 7	-	-	220	-	-	-	-	**220**	**220**	220	-	-	-	-	-	**220**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 41	-	-	140	-	-	-	-	**140**	**140**	140	-	-	-	-	-	**140**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 28	-	-	1,100	-	-	-	-	**1,100**	**1,100**	110	990	-	-	-	-	**1,100**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 51	-	-	400	-	-	-	-	**400**	**400**	40	360	-	-	-	-	**400**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 52	-	-	220	-	-	-	-	**220**	**220**	22	198	-	-	-	-	**220**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 53	-	-	230	-	-	-	-	**230**	**230**	23	207	-	-	-	-	**230**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 5	-	-	220	-	-	-	-	**220**	**220**	22	198	-	-	-	-	**220**
HRA Projects	Housing Development Schemes (HE)	Project 25	-	-	2,600	-	-	-	-	**2,600**	**2,600**	260	2,340	-	-	-	-	**2,600**
HRA Projects	Housing Development Schemes (HE)	Project 37	-	-	1,800	-	-	-	-	**1,800**	**1,800**	180	1,620	-	-	-	-	**1,800**
HRA Projects	Housing Development Schemes (HE)	Project 33	-	-	1,300	-	-	-	-	**1,300**	**1,300**	130	1,170	-	-	-	-	**1,300**
HRA Projects	Housing Development Schemes (HE)	Project 36	-	-	1,700	-	-	-	-	**1,700**	**1,700**	170	1,530	-	-	-	-	**1,700**
HRA Projects	Housing Development Schemes (HE)	Project 20	-	-	24,940	-	-	-	-	**24,940**	**24,940**	700	8,080	8,080	8,080	-	-	**24,940**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 27	-	-	-	1,700	-	-	-	**1,700**	**1,700**	-	170	1,530	-	-	-	**1,700**
HRA Projects	Housing Development Schemes (HE)	Project 26	-	-	-	1,200	-	-	-	**1,200**	**1,200**	-	120	1,080	-	-	-	**1,200**
HRA Projects	Housing Development Schemes (HE)	Project 22	-	-	-	2,800	-	-	-	**2,800**	**2,800**	-	280	2,520	-	-	-	**2,800**
HRA Projects	Housing Development Schemes (HE)	Project 54	-	-	-	200	-	-	-	**200**	**200**	-	20	180	-	-	-	**200**
HRA Projects	Housing Development Schemes (HE)	Project 55	-	-	-	200	-	-	-	**200**	**200**	-	20	180	-	-	-	**200**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 16	-	-	-	-	1,000	-	-	**1,000**	**1,000**	-	-	100	900	-	-	**1,000**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 56	-	-	-	-	200	-	-	**200**	**200**	-	-	20	180	-	-	**200**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 57	-	-	-	-	200	-	-	**200**	**200**	-	-	20	180	-	-	**200**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 30	-	-	-	-	1,100	-	-	**1,100**	**1,100**	-	-	110	990	-	-	**1,100**
HRA Projects	Housing Development Schemes (HE)	Project 23	-	-	-	-	4,100	-	-	**4,100**	**4,100**	-	-	410	3,690	-	-	**4,100**
HRA Projects	Housing Development Schemes (HE)	Project 24	-	-	-	-	1,100	-	-	**1,100**	**1,100**	-	-	110	990	-	-	**1,100**
HRA Projects	Housing Development Schemes (HE)	Project 12	-	-	-	-	1,600	-	-	**1,600**	**1,600**	-	-	160	1,440	-	-	**1,600**
HRA Projects	Housing Development Schemes (HE)	Project 35	-	-	-	-	1,700	-	-	**1,700**	**1,700**	-	-	170	1,530	-	-	**1,700**
HRA Projects	Housing Development Schemes (HE)	Project 31	-	-	-	-	1,100	-	-	**1,100**	**1,100**	-	-	110	990	-	-	**1,100**
HRA Projects	Housing Development Schemes (HE)	Project 13	-	-	-	-	1,100	-	-	**1,100**	**1,100**	-	-	110	990	-	-	**1,100**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 58	-	-	-	-	-	200	-	**200**	**200**	-	-	-	20	180	-	**200**
HRA Projects	Housing Schemes (1:4:1 Projects)	Project 59	-	-	-	-	-	200	-	**200**	**200**	-	-	-	20	180	-	**200**
HRA Subtotals			**978**	**8,687**	**66,013**	**9,135**	**16,060**	**3,285**	**2,770**	**97,263**	**106,928**	**21,634**	**32,574**	**26,705**	**22,885**	**3,130**	**-**	**106,928**
Grand Totals			**6,201**	**33,231**	**98,375**	**27,037**	**31,368**	**14,189**	**11,888**	**182,857**	**222,289**	**64,826**	**67,728**	**43,698**	**33,789**	**12,248**	**-**	**222,289**

Cabinet
07 February 2023

Treasury Management Strategy Statement
Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2023/24

Cabinet Member: Cllr Bob Deed, Leader and Cabinet Member for Finance
Responsible Officer: Andrew Jarrett, S151 (Deputy Chief Executive)

Reason for Report: To agree the proposed Treasury Management Strategy and Annual Investment Strategy for 2023/24.

RECOMMENDATION(S):

That Cabinet recommends to Full Council that the proposed Treasury Management Strategy and Annual Investment Strategy for 2023/24, including the prudential indicators for the next 3 years and the Minimum Revenue Provision Statement (Appendix 1), be approved.

Relationship to the Corporate Plan: Maximising our return from all associated treasury activities enables the Council to support current levels of spending in accordance with our Corporate Plan.

Financial Implications: Good financial management and administration underpins the entire strategy.

Legal Implications: Authorities are required by regulation to have regard to the Prudential Code when carrying out their duties under Part 1 of the Local Government Act 2003.

Risk Assessment: The S151 Officer is responsible for the administration of the financial affairs of the Council. Implementing this strategy and the CIPFA Code of Practice on Treasury Management helps manage the risk associated with the Council's treasury management activity.

Equality Impact Assessment: There are no Equalities Impact implications relating to the content of this report.

Impact on Climate Change: There are no Climate Change implications relating to the content of this report.

1.0 Background

1.1 The Council is required to operate a balanced budget, which broadly means that the cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

1.2 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans, or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.

1.3 The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

1.4 Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities (arising usually from capital expenditure), and are separate from the day to day treasury management activities.

1.5 CIPFA defines treasury management as:

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

1.6 In the recent Devon Audit Partnership audit (December 2022), a Substantial Assurance opinion was given, meaning the Council has "a sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited".

2.0 Reporting requirements

2.1 Treasury Strategy

2.1.1 The CIPFA 2021 Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report which will provide the following:

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

2.1.2 The aim of this treasury strategy is to ensure that all elected members of the Council fully understand the overall long-term policy objectives and resulting treasury strategy requirements, governance procedures and risk appetite.

2.2 Treasury Management reporting

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

a. Prudential and treasury indicators and treasury strategy (this report) - The first, and most important report is forward looking and covers:

- the capital plans (including prudential indicators);
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised), including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

b. A mid-year treasury management report – This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision. In addition, members will receive quarterly treasury updates as part of the financial monitoring.

c. An annual treasury report – This is a backward looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

2.2.2 **Scrutiny.** The above reports are required to be adequately scrutinised before being recommended to the Council. The Cabinet undertakes this role.

2.3 Treasury Management Strategy for 2023/24

2.3.1 The strategy for 2023/24 covers two main areas:

2.3.2 **Capital issues**

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

2.3.3 **Treasury management issues**

- The current treasury position;
- Treasury indicators which limit the treasury risk and activities of the Council;
- Prospects for interest rates;
- The borrowing strategy;
- Policy on borrowing in advance of need;
- Debt rescheduling;
- The investment strategy;
- Creditworthiness policy; and
- The policy on the use of external service providers.

2.3.4 These elements cover the requirements of the Local Government Act 2003, the Chartered Institute of Public Finance and Accountancy (CIPFA) Prudential Code, Department for Levelling Up, Housing and Communities (DLUHC – this was formerly the Ministry of Housing, Communities and Local Government [MHCLG]) MRP Guidance, the CIPFA Treasury Management Code and DLUHC Investment Guidance.

2.4 Training

2.4.1 The CIPFA Treasury Management Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for Scrutiny.

2.4.2 Furthermore, the Code states that all organisations are expected to have a formal and comprehensive knowledge and skills or training policy for the effective acquisition and retention of treasury management knowledge and skills for those responsible for management, delivery, governance and decision making.

2.4.3 The scale and nature of this will depend on the size and complexity of the organisation's treasury management needs. Organisations should consider how to assess whether treasury management staff and council members have the required knowledge and skills to undertake their roles and whether they have been able to maintain those skills and keep them up to date.

2.4.4 As a minimum, authorities should carry out the following to monitor and review knowledge and skills:

- Record attendance at training and ensure action is taken where poor attendance is identified;
- Prepare tailored learning plans for treasury management officers and board/council members;
- Require treasury management officers and board/council members to undertake self-assessment against the required competencies (as set out in the schedule that may be adopted by the organisation); and
- Have regular communication with officers and board/council members, encouraging them to highlight training needs on an ongoing basis.

2.4.5 In further support of the revised training requirements, CIPFA's Better Governance Forum and Treasury Management Network have produced a 'self-assessment by members responsible for the scrutiny of treasury management', which is available from the CIPFA website to download.

2.4.6 Training requirements of members will be reviewed in 2023/24 following the district election in May and training will be arranged as required.

2.4.7 The training needs of treasury management officers are periodically reviewed.

2.4.8 A formal record of the training received by officers central to the Treasury function will be maintained by the S151 (Deputy Chief Executive). Similarly, a formal record of the treasury management/capital finance training received by members will be maintained by the Member Services Manager.

2.5 Treasury management consultants

2.5.1 The Council uses Link Group as its external treasury management advisors. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of our external service providers.

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

3.0 The Capital Prudential Indicators 2023/24 – 2025/26

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

3.2 Capital expenditure and financing

3.2.1 This Prudential Indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. The below table shows planned expenditure in the 2023/24 Capital Programme of £64,826k, (£58,625k new projects plus the projected slippage from prior years £6,201k).

Prudential Indicator: Estimates of Capital Expenditure

Capital Expenditure £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
General Fund	3,836	5,224	17,084	23,992	2,855
HRA	4,196	7,446	21,634	32,574	26,705
Loans to Subsidiary Company *	3,591	9,282	26,108	11,162	14,138
Total	**11,623**	**21,952**	**64,826**	**67,728**	**43,698**

** Loans to Subsidiary Company are non-treasury investments and so not covered in detail in this report. Refer to the Capital Strategy for further information.*

For Members clarity, the NHS Hub loan is treated as General Fund.

3.2.2 Other long-term liabilities – The above financing need excludes other long-term liabilities, such as PFI and leasing arrangements that already include borrowing instruments.

3.2.3 The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of capital expenditure £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Capital Receipts	1,484	1,190	1,575	2,426	1,587
Capital Grants	1,367	4,934	15,023	29,652	11,016
Capital Reserves	0	0	0	0	0
Revenue	2,889	4,733	4,934	5,661	2,927
Net financing need for the year	**5,883**	**11,095**	**43,294**	**29,989**	**28,168**

3.2.4 The net financing need for Loans to Subsidiary Company included in the above table against expenditure is shown below:

Loans to Subsidiary Company £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Capital Expenditure	3,591	9,282	26,108	11,162	14,138
Financing Costs	0	0	0	0	0
Net financing need for the year	**3,591**	**9,282**	**26,108**	**11,162**	**14,138**
Percentage of total net financing need %	61.0%	83.7%	60.3%	37.2%	50.2%

The financing costs are zero as, to date, all lending has been funded through internal borrowing. This is forecast to be possible in the years 2023/24 – 2025/26.

3.3 The Council's borrowing need (the Capital Financing Requirement)

3.3.1 The second Prudential Indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

3.3.2 The CFR does not increase indefinitely, as the Minimum Revenue Provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life, and so charges the economic consumption of capital assets as they are used.

3.3.3 The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility by the PFI, PPP lease provider and so the Council is not required to separately borrow for these schemes. The Council currently has £2.314m of such schemes within the CFR.

3.3.4 **The Council is asked to approve the CFR projections below:**

Prudential Indicator: Estimates of Capital Financing Requirement

Capital Financing Requirement £000	**2021/22 Actual**	**2022/23 Estimate**	**2023/24 Estimate**	**2024/25 Estimate**	**2025/26 Estimate**
CFR – General Fund	10,162	9,877	14,223	19,411	18,856
CFR – Housing	39,603	40,580	51,934	64,400	76,626
CFR – Loans to Subsidiary Company	11,363	20,522	30,636	15,622	14,138
Total CFR	**61,128**	**70,979**	**96,793**	**99,433**	**109,620**
Movement in CFR*	**3,282**	**9,851**	**25,814**	**2,640**	**10,187**

**The movement in CFR will not directly match the Net Financing Need (see 3.2.3) due to the annual MRP charge reducing the balance in line with each asset's expected life. The CFR is cumulative, so increases and decreases for scheduled loans to, and repayments from, 3 Rivers Developments Ltd.*

3.4 Liability Benchmark

3.4.1 A third and new Prudential Indicator for 2023/24 is the Liability Benchmark (LB). The Authority is required to estimate and measure the LB for the forthcoming financial year and the following two financial years, as a minimum.

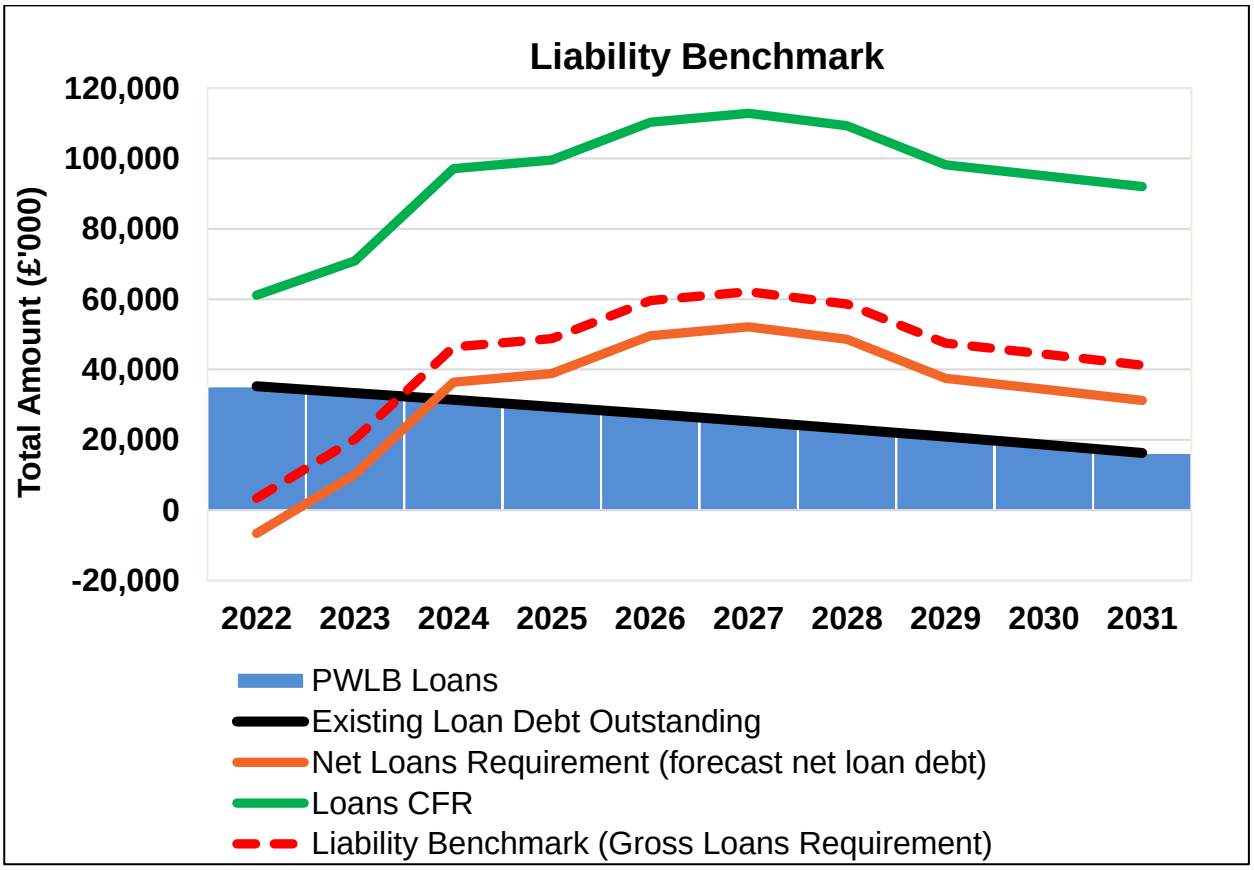
3.4.2 There are four compenents to the LB:

1. **Existing loan debt outstanding**: the Council's existing loans that are still outstanding in future years.
2. **Loans CFR**: this is calculated in accordance with the loans CFR definition in the Prudential Code and projected into the future based on approved prudential borrowing and planned MRP.

3 **Net loans requirement**: this will show the Council's gross loan debt less treasury management investments at the last financial year-end, projected into the future and based on its approved prudential borrowing, planned MRP and any other major cash flows forecast.

4 **Liability benchmark** (or gross loans requirement): this equals net loans requirement plus a short-term liquidity allowance.

3.4.3 The Council's Liability Benchmark for years ending March 2022 to March 2031 is shown below:



3.4.4 The chart can be interpreted as follows:

- The liability benchmark (red dashed line) is the Council's need for external borrowing.
- Where the liability benchmark exceeds the existing loans (black line) then there is a need for new borrowing. Where the liability benchmark is below the existing loans then the Council is holding surplus cash that will be put into short-term investments.
- The area between the liability benchmark and net loans requirement (orange line) shows the cash required to manage the Council's day-to-day cash flow need, which is estimated to be £10m.
- The area between the loans CFR (green line) and liability benchmark shows the potential for internal borrowing, which currently stands at circa £50m.

4.0 Borrowing

4.1 The capital expenditure plans set out in Section 3 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. This strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

4.2 Current portfolio position

4.2.1 The overall treasury management portfolio as at 31 March 2022 and the position as at 31 December 2022 are shown below for both borrowing and investments.

TREASURY PORTFOLIO				
	Actual	Actual	Current	Current
	31/03/2022	31/03/2022	31/12/2022	31/12/2022
Treasury Investments	**£000**	**%**	**£000**	**%**
Banks	17,832	43%	17,479	45%
Building Societies	4,000	10%	0	0%
Local Authorities	15,000	36%	11,000	28%
DMADF (H.M.Treasury)	0	0%	5,500	14%
Other Public Bodies	0	0%	0	0%
Total Managed In-House	**36,832**	**88%**	**33,979**	**87%**
Property Funds	5,000	12%	5,000	13%
Total Managed Externally	**5,000**	**12%**	**5,000**	**13%**
Total Treasury Investments	**41,832**	**100%**	**38,979**	**100%**
Treasury External Borrowing				
Local Authorities	0	0%	0	0%
PWLB	35,234	100%	34,279	100%
Total External Borrowing	**35,234**	**100%**	**34,279**	**100%**
Net Treasury Investments / (Borrowing)	**6,598**		**4,700**	

4.2.2 The Council's forward projections for borrowing are summarised below. The table shows the actual external debt (the treasury management operations) against the underlying capital borrowing need (the Capital Financing Requirement – CFR), highlighting any over or under borrowing.

External Debt £000	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Debt at 1 April	37,104	35,234	33,310	43,873	47,898
Expected Change in Debt	-1,870	-1,924	10,563	4,025	9,967
Other Long-Term Liabilities (OLTL)	2,436	2,190	2,314	2,037	2,323
Expected Change in OLTL	-247	125	-277	287	-532
Actual Gross Debt at 31 March	**37,423**	**35,625**	**45,910**	**50,222**	**59,656**
Capital Financing Requirement	**61,128**	**70,979**	**96,793**	**99,433**	**109,620**
Under / (Over) Borrowing	**23,705**	**35,354**	**50,883**	**49,211**	**49,964**

4.2.3 Within the range of Prudential Indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2023/24 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue or speculative purposes.

4.2.4 The S151 (Deputy Chief Executive) reports that the Council complied with this Prudential Indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

4.3 Treasury Indicators: limits to borrowing activity

4.3.1 **The operational boundary.** This is the limit which external debt is not normally expected to exceed. This is the CFR, split between debt and other long term liabilities (leases) and rounded up to the nearest million.

Prudential Indicator: Operational Boundary

Operational boundary £000	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Debt	69,000	95,000	98,000	108,000
Other long term liabilities	3,000	3,000	3,000	2,000
Total	**72,000**	**98,000**	**101,000**	**110,000**

4.3.2 **The Authorised Limit for external debt.** This is a key prudential indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the Full Council. It reflects the level of external debt, which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

4.3.3 This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised. The authorised limit is set at the CFR plus £5m for debt and £4m for other long term

liabilities, to cover exceptional circumstances and borrowing ahead of need to secure interest rates.

4.3.4 **The Council is asked to approve the following authorised limit:**

Prudential Indicator: Authorised Limit

Authorised Limit £000	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
Debt	74,000	100,000	103,000	113,000
Other long term liabilities	7,000	7,000	7,000	6,000
Total	**81,000**	**107,000**	**110,000**	**119,000**

4.4 Prospects for interest rates

4.4.1 The Council has appointed Link Group as its treasury advisor and part of their service is to assist the Council to formulate a view on future interest rates. The following table gives their view as at 19 December 2022.

Interest Rates	Dec 22	Mar 23	Jun 23	Sep 23	Dec 23	Mar 24	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25
Bank Rate View	3.50%	4.25%	4.50%	4.50%	4.50%	4.00%	3.75%	3.50%	3.25%	3.00%	2.75%	2.50%	2.50%
5yr PWLB Rate	4.20%	4.20%	4.20%	4.10%	4.00%	3.90%	3.80%	3.60%	3.50%	3.40%	3.30%	3.20%	3.10%
10yr PWLB Rate	4.30%	4.40%	4.40%	4.30%	4.10%	4.00%	3.90%	3.80%	3.60%	3.50%	3.40%	3.30%	3.30%
25yr PWLB Rate	4.60%	4.60%	4.60%	4.50%	4.40%	4.20%	4.10%	4.00%	3.90%	3.70%	3.60%	3.50%	3.50%
50yr PWLB Rate	4.30%	4.30%	4.30%	4.20%	4.10%	3.90%	3.80%	3.70%	3.60%	3.50%	3.30%	3.20%	3.20%

4.4.2 Over the last 12 months, the Bank of England has made a series of increases to Bank Rate in an attempt to tame inflation. CPI looks to have peaked at 11.1% in Q4 2022 and currently sits at 10.5%, yet further increases to Bank Rate are expected in the coming months to help bring this down further. The current Bank Rate is 3.5% and most forecasts, including that of Link Group, expect this to reach a peak of 4.5% around May of this year before falling again once inflationary pressures reach an acceptable level, perhaps as early as Q1 2024.

4.4.3 A more thorough economic outlook provided by our Treasury Advisors is detailed in **Appendices 2 and 3.**

4.5 Borrowing strategy

4.5.1 The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. With significant levels of capital expenditure expected during 2023/24, it is recommended that the Council maximises its use of internal borrowing rather than seeking to fund projects through new external borrowing. This strategy is prudent as investment returns are lower than the cost of borrowing and counterparty risk is still an issue that needs to be considered.

4.5.2 Against this background and the risks within the economic forecast, caution will be adopted with the 2023/24 treasury operations. The S151 (Deputy Chief Executive) will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- If it was felt that there was a significant risk of a sharp FALL in borrowing rates, then borrowing will be postponed;
- If it was felt that there was a significant risk of a much sharper RISE in borrowing rates than that currently forecast, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.
- The Council will consider all external loan options available in the market including Public Works Loans Board, Banks, Other Local Authorities and the Municipal Bond Agency. The term and repayment profile of any loans will be determined by the periods financing is required. The level of borrowing will stay within the above limits.

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

4.6 Policy on borrowing in advance of need

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

4.6.2 Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequently reported through the mid-year or annual reporting mechanism.

4.7 Debt rescheduling

4.7.1 Rescheduling of current borrowing in our debt portfolio is unlikely to occur as the penalties currently being applied to premature repayments are prohibitive. If rescheduling is done, it will be reported to the Cabinet at the earliest meeting following its action.

4.8 New financial institutions as a source of borrowing and / or types of borrowing

4.8.1 Currently the PWLB Certainty Rate is set at gilts + 80 basis points for both HRA and non-HRA borrowing. However, consideration may still need to be given to sourcing funding from the following sources for the following reasons:

- Local authorities (primarily shorter dated maturities out to 3 years or so – still cheaper than the Certainty Rate)
- Financial institutions (primarily insurance companies and pension funds but also some banks, out of forward dates where the objective is to avoid a “cost of carry”)

- Municipal Bonds Agency (possibly still a viable alternative depending on market circumstances prevailing at the time)

4.8.2 The degree to which any of these options proves cheaper than PWLB Certainty Rate is constantly evolving but our advisors will keep us informed.

4.9 Approved Sources of Long and Short Term Borrowing

On Balance Sheet	Fixed	Variable
PWLB	●	●
Municipal Bond Agency	●	●
Local Authorities	●	
Banks	●	●
Finance Leases	●	●

5.0 Annual Investment Strategy

5.1 Investment policy – management of risk

5.1.1 The DLUHC and CIPFA have extended the meaning of 'investments' to include both financial and non-financial investments. This report deals solely with financial investments (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy (a separate report).

5.1.2 The Council's investment policy has regard to the following:

- DLUHC's Guidance on Local Government Investments ("the Guidance");
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 ("the Code"); and
- CIPFA Treasury Management Guidance Notes 2021

5.1.3 The Council's investment priorities will be Security first, portfolio Liquidity second and then Yield (return) – known as the SLY Principle.

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

5.1.4.1 Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.

5.1.4.2 **Other information:** ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets, which the Council will achieve through engaging with its advisors to maintain a monitor on market pricing.

5.1.4.3 **Other information sources** used will include the financial press, share price and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

5.1.4.4 The Council has defined the list of **types of investment instruments** that the treasury management team are authorised to use. See **Appendix 4** for a list.

5.1.4.5 **Lending and transaction limits** (amounts and maturity) for each counterparty will be set through applying the matrix table in paragraph 5.2.6.

5.1.4.6 The Council will set a limit for the amount of its investments which are invested for **longer than 365 days** (see paragraph 5.4.9).

5.1.4.7 Investments will only be placed with counterparties from countries with a specified minimum **sovereign rating** (see paragraph 5.3.2).

5.1.5 The Council has engaged external consultants (see paragraph 2.5.1), to provide expert advice on how to optimise an appropriate balance of Security, Liquidity and Yield, given the risk appetite of the Council in the context of the expected level of cash balances and need for liquidity throughout the year.

5.1.6 All investments will be denominated in sterling.

5.1.7 As a result of the change in accounting standards for 2019/20 under IFRS 9, the Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the then MHCLG concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31 March 2023.) It has not yet been determined whether a further extension to the override will be agreed by Government.

5.1.8 However, the Council will also pursue **value for money** in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance (see section 5.5). Regular monitoring of investment performance will be carried out during the year.

5.1.9 The above criteria are unchanged from last year.

5.2 Creditworthiness policy

5.2.1 The primary principle governing the Council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the Council will ensure that:

- It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate

security, and monitoring their security. This is set out in the specified and non-specified investment sections below; and

- It has sufficient liquidity in its investments. For this purpose, it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's prudential indicators covering the maximum principal sums invested.

5.2.2 The S151 (Deputy Chief Executive) will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to that which determines which types of investment instrument are either specified or non-specified as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.

5.2.3 Credit rating information is supplied by Link Group, our treasury advisors, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating Watches (notification of a likely change), rating Outlooks (notification of the longer-term bias outside the central rating view) are provided to officers almost immediately after they occur and this information is considered before dealing. For instance, a negative rating Watch applying to a counterparty with the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.

5.2.4 The criteria for providing a pool of high quality investment counterparties (both specified and non-specified investments) is:

- Banks 1 - good credit quality – the Council will only use banks which:
    i. are UK banks; and/or
    ii. are non-UK and domiciled in a country which has a minimum sovereign Long Term Fitch rating of AAA; and
    iii. have, as a minimum, a credit rating of F1 (Fitch), with regard for Moody's and Standard & Poor's credit ratings (where rated).
- Banks 2 – The Council's own banker for transactional purposes if the bank falls below the above criteria, although in this case balances will be minimised in both monetary size and time invested.
- Building Societies – The Council will use all societies which:
    i. Meet the Fitch rating for banks outlined above; and
    ii. Have assets in excess of £1bn;
- Money Market Funds Fitch CNAV AAAmmf/AAA
- Money Market Funds LNVAV AAAmmf/AAA
- Money Market Funds VNAV AAAmmf/AAA
- UK Government (including gilts, Treasury Bills and the DMADF)
- Local authorities, Police, Fire, parish councils and other public bodies

5.2.5 **Use of additional information other than credit ratings.** Additional requirements under the Code require the Council to supplement credit rating information. Whilst the above criteria relies primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool

of counterparties. This additional market information will be applied to compare the relative security of differing investment opportunities.

5.2.6 **Time and monetary limits applying to investments.** The time and monetary limits for institutions on the Council's counterparty list are as follows (these will cover both specified and non-specified investments):

Details	Fitch Short term Rating	Money and/or % Limit	Transaction Limit	Time Limit
The Council's bank* (currently NatWest)	F1	£5m + balance of grant funds	n/a	n/a
Banks 1 (good credit quality)	F1	£5m	£5m	2yr
Banks 2 (Council's banker if not meeting Banks 1)	F2/F3	£5m (call account)	£5m (call account)	1 day
DMADF	UK sovereign rating	unlimited	unlimited	unlimited
Local authorities & other public bodies	N/A	unlimited	unlimited	unlimited
Building Societies	F1	£5m	£5m	2yr
Money Market Funds - CNAV	AAAmmf/AAA	£2m	£2m	liquid
Money Market Funds - LVNAV	AAAmmf/AAA	£2m	£2m	liquid
Money Market Funds - VNAV	AAAmmf/AAA	£2m	£2m	liquid

**This limit was approved in the TMSS for 2021/22 to allow the continued administration of business grant funds.*

The above table relates to financial investments only – non-financial investments, such as commercial loans or purchases of income yielding assets are covered in the Capital Strategy.

5.2.7 The proposed criteria for specified and non-specified investments are shown in **Appendix 4** for approval.

5.2.8 **Creditworthiness**

5.2.9 Significant levels of downgrades to short- and long-term credit ratings have not materialised since the crisis in March 2020. In the main, where they did change, any alterations were limited to Outlooks. However, more recently the UK sovereign debt rating has been placed on Negative Outlook by the three major rating agencies in the wake of the Truss/Kwarteng unfunded tax-cuts policy. Although the Sunak/Hunt government has calmed markets, the outcome of the rating agency reviews is unknown at present, but it is possible the UK sovereign debt

rating will be downgraded. Accordingly, when setting minimum sovereign debt ratings, this Authority will not set a minimum rating for the UK.

5.3 Other limits

5.3.1 Due care will be taken to consider the country, group and sector exposure of the Council's investments.

5.3.2 **Country limit.** The Council has determined that it will only use approved counterparties from the UK and from countries with a minimum sovereign credit rating of AAA. The list of countries that qualify using this credit criteria as at the date of this report are shown in **Appendix 5**. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.

5.3.3 **Other limits.** In addition:

- no more than 30% of overall investment balances will be placed with any non-UK country at any time;
- limits in place above will apply to a group of companies; and
- the Council will not hold more than £5m with any banking group.

5.4 Investment strategy

5.4.1 **In-house funds**

5.4.2 Over recent years, the Council has typically held upwards of £20m in short term investments with the objective of managing cash flows whilst earning a return at the same time. These returns remained historically low for two years after interest rates plummeted at the start of the Covid-19 pandemic in Q4 2019/20, however increases to interest rates over the last 12 months have seen returns on short term investments rebound from £54k in 2021/22 to a forecast £534k in 2022/23.

5.4.3 Retaining cash balances (short term investments + current account [excluding Covid-19 grant funds]) of £10m would be enough to ensure a regular turnover in short term investments to manage the fluctuations in cash flows. Therefore, internal borrowing will be used to finance capital expenditure where cash balances remain above £10m, with external borrowing only sought to keep balances above this limit where necessary. Interest rates currently available from PWLB are around 50 basis points (0.50%) higher than rates available for short term investments, and so maximising internal borrowing could result in net savings of around £50k per annum versus maintaining cash balances at current levels.

5.4.4 As cash balances reduce through 2023/24, there will be a need to reduce the average maturity on investments to ensure a regular turnover of maturities, which will be matched with the Council's large cash outflows. This will mean the primary consideration for investments will be the core balance and cash flow requirements, with the outlook for short-term interest rates only considered where significant changes are expected. Greater returns are usually obtainable by investing for longer periods, however this needs to be balanced with the Council's cash requirements.

- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.
- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

5.4.5 **Investment returns expectations**

5.4.6 The current forecast shown in paragraph 4.4.1, includes a forecast for Bank Rate to reach 4.5% in Q2 2023.

5.4.7 The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows:

Year	%
2023/24	4.40%
2024/25	3.30%
2025/26	2.60%
2026/27	2.50%
Later years	2.80%

5.4.8 **Investment treasury indicator and limit -** total principal funds invested for greater than 365 days. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end.

5.4.9 **The Council is asked to approve the following treasury indicator and limit:**

Upper limit for principal sums invested for longer than 365 days	2023/24 (£m)	2024/25 (£m)	2025/26 (£m)
Principal sum invested for longer than 365 days but not exceeding 2 years.	5	5	5

5.4.10 For its cash flow generated balances, the Council will seek to utilise money market funds and short-dated deposits (overnight to 365 days) in order to benefit from the compounding of interest.

5.5 Investment performance / risk benchmarking

5.5.1 The Council will use an investment benchmark to assess the performance of its investment portfolio of 7 day SONIA (Sterling Overnight Index Average).

5.6 End of year investment report

5.6.1 At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

5.7 Commercial and Non-Financial Investments

5.7.1 **Property Investments.** A limit of £5m will be applied to the use of non-specified investments. This principally relates to property funds, which is within the Local Authorities' Property Fund via CCLA.

5.7.2 **Non-Financial Investments.** On the 30th March 2017, Cabinet approved the establishment of a Special Purpose Vehicle – 3 Rivers Developments Limited and that the Council could lend to 3 Rivers Developments Ltd. This company is a subsidiary of Mid Devon District Council and has the sole purpose of property development.

5.7.3 There is no cap on the amount of money that can be loaned to 3 Rivers Developments Ltd. However, for each new project the company takes on, there is an individual loan agreement signed by the S151 Officer prior to any lending. All project spending / borrowing requirements are approved annually by Cabinet as part of the company's Annual Report/Business Plan, with individual Business Cases reviewed and approved by Cabinet on any development over £1m.

5.7.4 Please refer to the Capital Strategy for a more detailed programme and borrowing streams.

6.0 Conclusion

6.1 Treasury management is a highly complex and specialist subject. It is tightly controlled by regulation and procedures that the Council must abide by. In addition to the skilled staff in house, the Council has access to advice from its Treasury Advisors (Link Group) where we need it to ensure that we comply with these rules.

6.2 Cabinet will consider the Treasury Management Strategy before recommending Full Council approve it at its budget meeting on 22 February.

APPENDICES

1. Prudential and treasury indicators and MRP statement
2. Interest rate forecasts
3. Economic background
4. Treasury management practice 1 – credit and counterparty risk management
5. Approved countries for investments
6. Treasury management scheme of delegation
7. The treasury management role of the Section 151 Officer

Contact for more information:

Andrew Jarrett (01884 234242 | ajarrett@middevon.gov.uk) or

Kieran Knowles (01884 244624 | kknowles@middevon.gov.uk)

APPENDIX 1

1.0 THE CAPITAL PRUDENTIAL AND TREASURY INDICATORS 2023/24 – 2025/26

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

1.1 Capital expenditure

See section 3.2 for the breakdown of capital expenditure.

1.2 Affordability prudential indicators

The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. **The Council is asked to approve the following indicators:**

Ratio of financing costs to net revenue stream

This indicator identifies the trend in the cost of capital, (borrowing and other long-term obligation costs net of investment income), against the net revenue stream.

%	2021/22 Actual	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate
General Fund	0.95%	-3.55%	-4.89%	-3.14%	-3.45%
HRA	15.06%	12.56%	12.59%	15.63%	17.16%

The estimates of financing costs include current commitments and the proposals in this budget report.

1.3 Minimum Revenue Provision (MRP) Policy Statement

Where the Council finances capital expenditure by debt, it must put aside resources to repay that debt in later years. The amount charged to the revenue budget for the repayment of debt is known as Minimum Revenue Provision (MRP), although there has been no statutory minimum since 2008. The Local Government Act 2003 requires the Council to have regard to the Department of Levelling Up, Housing & Communities' *Statutory Guidance on Minimum Revenue Provision* (the DLUHC Guidance).

The broad aim of the DLUHC Guidance is to ensure that debt is repaid over a period that is either reasonably commensurate with that over which the capital expenditure provides benefits, or, in the case of borrowing supported by Government Revenue Support Grant, reasonably commensurate with the period implicit in the determination of that grant.

The DLUHC Guidance requires the Council to approve an Annual MRP Statement each year, and recommends a number of options for calculating a prudent amount of MRP.

The Council is recommended to approve the following MRP Statement*:*

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

- **Based on CFR** – MRP will be based on the CFR.

This option provides for an approximate 4% reduction in the borrowing need (CFR) each year.

From 1 April 2008 for all unsupported borrowing (including PFI and finance leases) the MRP policy will be*:*

- **Asset life method** – MRP will be based on the estimated life of the assets, in accordance with the regulations (this option must be applied for any expenditure capitalised under a Capitalisation Direction)

This option provides for a reduction in the borrowing need over approximately the asset's life.

Finance leases will have their capital financing applied on a straight-line basis over the life of the lease contract.

There is no requirement on the HRA to make a Minimum Revenue Provision but there is a requirement for a charge for depreciation to be made.

The MRP requirement for a finance lease or PFI contract is deemed to be equal to the element of the charge/rent that goes to write down the balance sheet liability.

For capital expenditure loans to third parties that are expected to be repaid in full, the Council will make nil MRP, but will instead apply the capital receipts arising from principal repayments to reduce the capital financing requirement. Where it becomes probable that a loan will not be repaid in full, MRP will be charged in accordance with the Expected Credit Loss (ECL) model outlined in IFRS 9.

MRP will not be charged against capital expenditure in the year it is incurred, but will instead commence the following year. Capital expenditure incurred during 2022/23 will not be subject to a MRP charge until 2023/24.

1.4 MRP Overpayments

A change introduced by the revised DLUHC MRP Guidance was the allowance that any charges made over the statutory Minimum Revenue Provision (MRP), Voluntary Revenue Provision (VRP) or overpayments, can, if needed, be reclaimed in later years if deemed necessary or prudent. In order for these sums to be reclaimed for use in the budget, this policy must disclose the cumulative overpayment made each year. Up until the 31 March 2022, the total VRP overpayments were £0m.

APPENDIX 2 – Provided by Link Group (MDDC's Treasury Advisor)

2.0 INTEREST RATE FORECASTS 2023-2025

Link Group Interest Rate View

Interest Rates	Dec 22	Mar 23	Jun 23	Sep 23	Dec 23	Mar 24	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25
Bank Rate View	3.50%	4.25%	4.50%	4.50%	4.50%	4.00%	3.75%	3.50%	3.25%	3.00%	2.75%	2.50%	2.50%
5yr PWLB Rate	4.20%	4.20%	4.20%	4.10%	4.00%	3.90%	3.80%	3.60%	3.50%	3.40%	3.30%	3.20%	3.10%
10yr PWLB Rate	4.30%	4.40%	4.40%	4.30%	4.10%	4.00%	3.90%	3.80%	3.60%	3.50%	3.40%	3.30%	3.30%
25yr PWLB Rate	4.60%	4.60%	4.60%	4.50%	4.40%	4.20%	4.10%	4.00%	3.90%	3.70%	3.60%	3.50%	3.50%
50yr PWLB Rate	4.30%	4.30%	4.30%	4.20%	4.10%	3.90%	3.80%	3.70%	3.60%	3.50%	3.30%	3.20%	3.20%

The central forecast for interest rates was updated on 19 December and reflected a view that the MPC would be keen to further demonstrate its anti-inflation credentials by delivering a succession of rate increases. Bank Rate stands at 3.5% currently but is expected to reach a peak of 4.5% in H1 2023.

Further down the road, it is anticipated that the Bank of England will be keen to loosen monetary policy when the worst of the inflationary pressures are behind us – but that timing will be one of fine judgment: cut too soon, and inflationary pressures may well build up further; cut too late and any downturn or recession may be prolonged.

The CPI measure of inflation looks to have peaked at 11.1% in Q4 2022 (currently 10.7%). Despite the cost-of-living squeeze that is still taking shape, the Bank will want to see evidence that wages are not spiralling upwards in what is evidently a very tight labour market.

Regarding the plan to sell £10bn of gilts back into the market each quarter (Quantitative Tightening), this has started and will focus on the short, medium and longer end of the curve in equal measure, now that the short-lived effects of the Truss/Kwarteng unfunded dash for growth policy are firmly in the rear-view mirror.

In the upcoming months, forecasts will be guided not only by economic data releases and clarifications from the MPC over its monetary policies and the Government over its fiscal policies, but the on-going conflict between Russia and Ukraine. More recently, the heightened tensions between China/Taiwan/US also have the potential to have a wider and negative economic impact.

On the positive side, consumers are still estimated to be sitting on over £160bn of excess savings left over from the pandemic so that will cushion some of the impact of the above challenges. However, most of those are held by more affluent people whereas lower income families already spend nearly all their income on essentials such as food, energy and rent/mortgage payments.

PWLB RATES

- The yield curve movements have become less volatile of late and PWLB 5 to 50 years Certainty Rates are, generally, in the range of 4.10% to 4.80%.
- The markets are seen as having built in, already, nearly all the effects on gilt yields of the likely increases in Bank Rate and the elevated inflation outlook.

The balance of risks to the UK economy: -

- The overall balance of risks to economic growth in the UK is to the downside.

Downside risks to current forecasts for UK gilt yields and PWLB rates include: -

- **Labour and supply shortages** prove more enduring and disruptive and depress economic activity (accepting that in the near-term this is also an upside risk to inflation and, thus, rising gilt yields).

- **The Bank of England** acts too quickly, or too far, over the next year to raise Bank Rate and causes UK economic growth, and increases in inflation, to be weaker than we currently anticipate.

- **UK / EU trade arrangements** – if there was a major impact on trade flows and financial services due to complications or lack of co-operation in sorting out significant remaining issues.

- **Geopolitical risks,** for example in Ukraine/Russia, China/Taiwan/US, Iran, North Korea and Middle Eastern countries, which could lead to increasing safe-haven flows.

Upside risks to current forecasts for UK gilt yields and PWLB rates: -

- The **Bank of England is too slow** in its pace and strength of increases in Bank Rate and, therefore, allows inflationary pressures to build up too strongly and for a longer period within the UK economy, which then necessitates Bank Rate staying higher for longer than we currently project or even necessitates a further series of increases in Bank Rate.

- **The Government** acts too quickly to cut taxes and/or increases expenditure in light of the cost-of-living squeeze.

- **The pound weakens** because of a lack of confidence in the UK Government's fiscal policies, resulting in investors pricing in a risk premium for holding UK sovereign debt.

- Longer term **US treasury yields** rise strongly and pull gilt yields up higher than currently forecast.

- Projected **gilt issuance, inclusive of natural maturities and QT,** could be too much for the markets to comfortably digest without higher yields consequently.

Borrowing advice: The long-term (beyond 10 years) forecast for Bank Rate stands at 2.5%. As all PWLB certainty rates are currently above this level, borrowing strategies will need to be reviewed in that context. Better value can generally be obtained at the shorter end of the curve and short-dated fixed LA to LA monies should be considered. Temporary borrowing rates are likely, however, to remain near Bank Rate and may also prove attractive whilst the market waits for inflation, and therein gilt yields, to drop back later in 2023.

APPENDIX 3 – Provided by Link Group (MDDC's Treasury Advisor)

3.0 ECONOMIC BACKGROUND

Against a backdrop of stubborn inflationary pressures, the easing of Covid restrictions in most developed economies, the Russian invasion of Ukraine, and a range of different UK Government policies, it is no surprise that UK interest rates have been volatile right across the curve, from Bank Rate through to 50-year gilt yields, for all of 2022.

Market commentators' misplaced optimism around inflation has been the root cause of the rout in the bond markets with, for example, UK, EZ and US 10-year yields all rising by over 200bps since the turn of the year. The table below provides a snapshot of the conundrum facing central banks: inflation is elevated but labour markets are extra-ordinarily tight, making it an issue of fine judgment as to how far monetary policy needs to tighten.

	UK	Eurozone	US
Bank Rate	3.5%	2.0%	4.25%-4.50%
GDP	-0.2%q/q Q3 (2.4%y/y)	+0.2%q/q Q3 (2.1%y/y)	2.6% Q3 Annualised
Inflation	10.7%y/y (Nov)	10.1%y/y (Nov)	7.1%y/y (Nov)
Unemployment Rate	3.7% (Oct)	6.5% (Oct)	3.7% (Nov)

Q2 of 2022 saw UK GDP revised upwards to +0.2% q/q, but this was quickly reversed in the third quarter, albeit some of the fall in GDP can be placed at the foot of the extra Bank Holiday in the wake of the Queen's passing. Nevertheless, CPI inflation has picked up to what should be a peak reading of 11.1% in October, although with further increases in the gas and electricity price caps pencilled in for April 2023, and the cap potentially rising from an average of £2,500 to £3,000 per household, there is still a possibility that inflation will spike higher again before dropping back slowly through 2023.

The UK unemployment rate fell to a 48-year low of 3.6%, and this despite a net migration increase of c500k. The fact is that with many economic participants registered as long-term sick, the UK labour force actually shrunk by c500k in the year to June. Without an increase in the labour force participation rate, it is hard to see how the UK economy will be able to grow its way to prosperity, and with average wage increases running at over 6% the MPC will be concerned that wage inflation will prove just as sticky as major supply-side shocks to food and energy that have endured since Russia's invasion of Ukraine on 22nd February 2022.

Throughout Q3 Bank Rate increased, finishing the quarter at 2.25% (an increase of 1%). Q4 has seen rates rise to 3.5% in December and the market expects Bank Rate to hit 4.5% by May 2023.

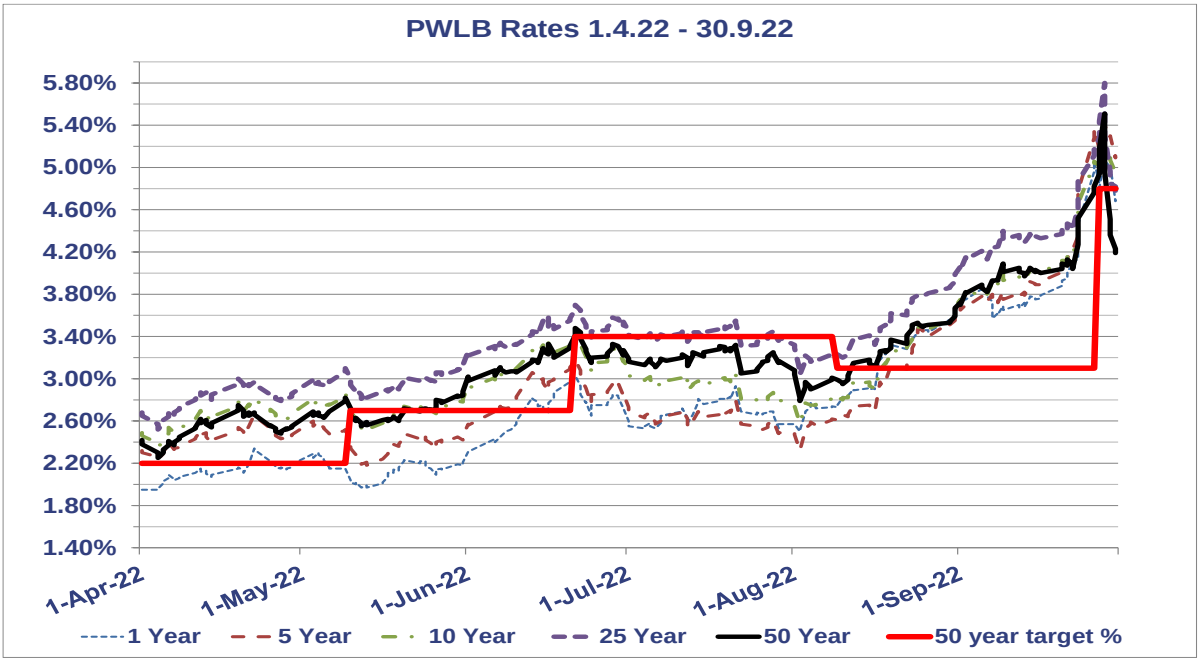
Following a Conservative Party leadership contest, Liz Truss became Prime Minister for a tumultuous seven weeks that ran through September and October. Put simply, the markets did not like the unfunded tax-cutting and heavy spending policies put forward by her Chancellor, Kwasi Kwarteng, and their reign lasted barely seven weeks before being

replaced by Prime Minister Rishi Sunak and Chancellor Jeremy Hunt. Their Autumn Statement of 17th November gave rise to a net £55bn fiscal tightening, although much of the "heavy lifting" has been left for the next Parliament to deliver. However, the markets liked what they heard, and UK gilt yields have almost completely reversed the increases seen under the previous tenants of No10/11 Downing Street.

Globally, though, all the major economies are expected to struggle in the near term. The fall below 50 in the composite Purchasing Manager Indices for the UK, US, EZ and China all point to at least one, if not more, quarters of GDP contraction. In November, the MPC projected eight quarters of negative growth for the UK lasting throughout 2023 and 2024, but with Bank Rate set to peak at lower levels than previously priced in by the markets and the fiscal tightening deferred to some extent, it is not clear that things will be as bad as first anticipated by the Bank.

The £ has strengthened of late, recovering from a record low of $1.035, on the Monday following the Truss government's "fiscal event", to $1.22. Notwithstanding the £'s better run of late, 2023 is likely to see a housing correction of some magnitude as fixed-rate mortgages have moved above 5% and affordability has been squeezed despite proposed Stamp Duty cuts remaining in place.

In the table below, the rise in gilt yields, and therein PWLB rates, through the first half of 2022/23 is clear to see.



However, the peak in rates on 28th September as illustrated in the table covering April to September 2022 below, has been followed by the whole curve shifting lower. PWLB rates at the front end of the curve are generally over 1% lower now whilst the 50 years is over 1.75% lower.

	1 Year	5 Year	10 Year	25 Year	50 Year
Low	1.95%	2.18%	2.36%	2.52%	2.25%
Date	01/04/2022	13/05/2022	04/04/2022	04/04/2022	04/04/2022
High	5.11%	5.44%	5.35%	5.80%	5.51%
Date	28/09/2022	28/09/2022	28/09/2022	28/09/2022	28/09/2022
Average	2.81%	2.92%	3.13%	3.44%	3.17%
Spread	3.16%	3.26%	2.99%	3.28%	3.26%

After a shaky start to the year, the S&P 500 and FTSE 100 have climbed in recent weeks, albeit the former is still 17% down and the FTSE 2% up. The German DAX is 9% down for the year.

CENTRAL BANK CONCERNS – DECEMBER 2022

In December, the Fed decided to push up US rates by 0.5% to a range of 4.25% to 4.5%, whilst the MPC followed by raising Bank Rate from 3% to 3.5%, in line with market expectations. EZ rates have also increased to 2% with further tightening in the pipeline.

Having said that, the sentiment expressed in the press conferences in the US and the UK were very different. In the US, Fed Chair, Jerome Powell, stated that rates will be elevated and stay higher for longer than markets had expected. Governor Bailey, here in the UK, said the opposite and explained that the two economies are positioned very differently so you should not, therefore, expect the same policy or messaging.

Regarding UK market expectations, although they now expect Bank Rate to peak within a lower range of 4.5% - 4.75%, caution is advised as the Bank of England Quarterly Monetary Policy Reports have carried a dovish message over the course of the last year, only for the Bank to have to play catch-up as the inflationary data has proven stronger than expected.

In addition, the Bank's central message that GDP will fall for eight quarters starting with Q3 2022 may prove to be a little pessimistic. Will the £160bn excess savings accumulated by households through the Covid lockdowns provide a spending buffer for the economy – at least to a degree? Ultimately, however, it will not only be inflation data but also employment data that will mostly impact the decision-making process, although any softening in the interest rate outlook in the US may also have an effect (just as, conversely, greater tightening may also).

APPENDIX 4

4.0 TREASURY MANAGEMENT PRACTICE (TMP1) – CREDIT AND COUNTERPARTY RISK MANAGEMENT

Specified Investments: All investments with a high level of credit quality subject to a maturity limit of one year.

Non-Specified Investments: Any investments that do not meet the specified investment criteria. These may be of a lower credit quality, for periods in excess of one year, or are more complex instruments which require a greater consideration by members and officers before being authorised for use. A maximum of £5m will be held in aggregate in non-specified investment.

A variety of investment instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made, it will fall into one of the above categories.

The criteria, time limits and monetary limits applying to institutions or investment vehicles are:

	Minimum credit criteria	Max % of total investments / £ limit per institution	Max. maturity period
DMADF – UK Government	N/A	100%	Any
UK Government gilts	UK sovereign rating	100%	Any
UK Government Treasury bills	UK sovereign rating	100%	Any
Money Market Funds CNAV	AAAmmf/AAA	£2m	Liquid
Money Market Funds LNVAV	AAAmmf/AAA	£2m	Liquid
Money Market Funds VNAV	AAAmmf/AAA	£2m	Liquid
Local authorities	N/A	100%	Any
Term deposits with banks and building societies	F1 (Fitch) / £1bn asset base for building societies	£5m	2 Years
Term deposits with Non-UK banks and building societies	Sovereign Fitch rating of AAA	£3m	1 Year
Gilt funds	UK sovereign rating	100%	Any
Property funds	LA Property Fund	£5m	Ongoing

In addition to the minimum credit criteria outlined in the above table, all term deposits with banks and building societies will be subject to the maximum recommended duration set out by Link Group.

Accounting treatment of investments. The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by the Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

Environmental, Social and Governance (ESG) factors. Following changes to the CIPFA Treasury Management Code 2021, the Council is required to consider ESG factors as part of its investment policy. This is a new and evolving area within the short-term financial markets, so the impact on investment decisions will be limited for the coming year.

Governance is by far the most important part of ESG when considering treasury investments, as this is most likely to impact on the financial performance of an entity and its ability to repay deposits. Governance issues already play a role in the selection of acceptable investment counterparties, as any banks or building societies with significant governance concerns are unlikely to achieve the high credit ratings required for the Council to deposit funds.

Environmental and Social factors have less of an impact when considering short-term investments. This is because investments specifically for environmental or social gain are typically longer term and inherently more risky, which isn't aligned with the Security, Liquidity and Yield (SLY) principle the Council currently follows. Only the larger banks and building societies are able to achieve the credit ratings required by the Council, all of which are likely to have environmental and social aims broadly aligned with that of the Council, so further consideration of these factors are currently unlikely to influence the Council's investment decisions.

Further work on ESG is required by the financial markets before the Council can incorporate this into its investment policy. Trying to do this too early could result in artificially limiting potential counterparty options, thus decreasing diversification and increasing financial risk. This could then lead to the need to widen credit criteria to find more counterparties, again increasing financial risk beyond what is considered prudent and acceptable. Members will be updated on any significant advances by the financial markets that could allow the formulation of ESG criteria to include in the Council's investment policy.

APPENDIX 5

5.0 APPROVED COUNTRIES FOR INVESTMENTS

AAA

- Australia
- Denmark
- Germany
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

The sovereign ratings shown above are at 19 December 2022 from Link Group.

APPENDIX 6

6.0 TREASURY MANAGEMENT SCHEME OF DELEGATION

(i) Full Council

- receiving and reviewing reports on treasury management policies, practices and activities;
- approval of annual strategy.

(ii) Cabinet

- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- budget consideration and approval;
- approval of the division of responsibilities;
- receiving and reviewing regular monitoring reports and acting on recommendations;
- approving the selection of external service providers and agreeing terms of appointment.

(iii) Cabinet

- reviewing the treasury management policy and procedures and making recommendations to the responsible body.

(iv) Delegation from the S151 (Deputy Chief Executive) to the nominated post(s) for the taking of the investment decisions:

- Corporate Manager for Finance and Procurement (Deputy S151)

APPENDIX 7

7.0 THE TREASURY MANAGEMENT ROLE OF THE SECTION 151 OFFICER

The S151 (responsible) officer

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- submitting regular treasury management policy reports;
- submitting budgets and budget variations;
- receiving and reviewing management information reports;
- reviewing the performance of the treasury management function;
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- ensuring the adequacy of internal audit, and liaising with external audit;
- recommending the appointment of external service providers;
- preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long term timeframe for example 25+ years;
- ensuring that the capital strategy is prudent, sustainable, affordable and prudent in the long term and provides value for money;
- ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the authority;
- ensure that the authority has appropriate legal powers to undertake expenditure on non-financial assets and their financing;
- ensuring the proportionality of all investments so that the authority does not undertake a level of investing which exposes the authority to an excessive level of risk compared to its financial resources;
- ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long term liabilities;
- provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees;
- ensuring that members are adequately informed and understand the risk exposures taken on by an authority;
- ensuring that the authority has adequate expertise, either in house or externally provided, to carry out the above;
- creation of Treasury Management Practices which specifically deal with how non treasury investments will be carried out and managed, to include the following
    - *Risk management (TMP1 and schedules), including investment and risk management criteria for any material non-treasury investment portfolios;*
    - *Performance measurement and management (TMP2 and schedules), including methodology and criteria for assessing the performance and success of non-treasury investments;*

- *Decision making, governance and organisation (TMP5 and schedules), including a statement of the governance requirements for decision making in relation to non-treasury investments; and arrangements to ensure that appropriate professional due diligence is carried out to support decision making;*

- *Reporting and management information (TMP6 and schedules), including where and how often monitoring reports are taken;*

- *Training and qualifications (TMP10 and schedules), including how the relevant knowledge and skills in relation to non-treasury investments will be arranged.*

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CABINET
FEBRUARY 7 2023

PAY POLICY

Cabinet Member(s): Cllr Bob Deed
Responsible Officers: Matthew Page, Corporate Manager for People, Governance and Waste
James Hamblin, Operations Manager Human Resources

Reason for Report: To comply with the legislative requirements of the Localism Act 2011 relating to senior pay in particular the role of the Chief Executive, Directors and other senior officers. The Localism Act 2011 requires an annually published Pay Policy which has been adopted by the full Council.

Recommendation: The Cabinet is asked to recommend to Council the Pay Policy 2023.

Financial Implications: None arising from this report which aims to ensure that the Council pays enough to recruit and retain senior staff, but avoids excessive pay levels.

Budget and Policy Framework: This policy sits within the current budget and policy framework.

Legal Implications: None directly arising from this report. The Head of Paid Services (Chief Executive) is required by Article 14 of the Constitution to keep under review the number, grade and organisation of officers, as well as the manner in which the Council's functions is coordinated and discharged. Further, the overall developmental and management structure, as well as the deployment of officers, is to be published.

Risk Assessment: The risk to the Council of not complying with the legislative requirement is mitigated by this report and having a robust performance management system.

Equality Impact Assessment: Equality of pay is a legal requirement and while no specific issues arise from this report, it should be noted that the pay policy contains the annual gender pay gap reporting (as required by law).

Relationship to Corporate Plan: To have a robust Pay Policy which ensures good use of public money in respect of the salaries of the most senior employees of the Council that is both transparent and visible. To ensure the Council is able to recruit and retain staff of a sufficiently high calibre who are able to deliver the objectives of the Corporate Plan.

Impact on Climate Change: No climate change issues highlighted in this report.

1.0 **Introduction/Background**

1.1 The localism bill required that all local authorities publish a Pay Policy on an annual basis. The Policy should be agreed by a meeting of the Council and be published on the Council's website.

1.2 The purpose of having a Pay Policy is so that the pay and related awards structure of the Council are transparent. The Pay Policy is detailed in Appendix 1.

1.3 At the present time, the Chief Executive is appraised on an annual basis by a group of Members as set out in the Constitution. The Leader consults a review panel which includes the Deputy Leader, the Chairman and Chair of Scrutiny on the objectives to be set and these are agreed with the Chief Executive.

1.4 Cabinet and Leadership Team meet on a monthly basis to monitor progress within each service area. Cabinet members can raise issues with the Chief Executive and Directors on performance in any area of the Council.

1.5 In discussion with the Cabinet Member for the Working Environment and Support Services, a commitment was given last year to regularly review the content of the Pay Supplement Policy. It is attached in Appendix 2 for information.

1.6 In addition, we have also attached a scheme of delegation as required by law to agree potential settlement agreements should a situation arise where they be seen as necessary.

1.7 The Cost of Living rise agreed between the LGA and the Unions gave each employee a rise of £1, 925 regardless of their role or grade. This was awarded at the start of November and was paid on the 22 November 2022.

1.8 This increase has resulted in the annual mean pay of all employees increasing from £25, 415 in 21/22 to £27, 724 in 22/23. It has also resulted in the pay multiple of the Chief Executive for 22/23 to both the mean salary in the Council and the lowest paid FTE employee decreasing from 21/22.

1.8 The pay talks for the 23/24 cost of living rise are due to commence in early February 2023 and so a settlement could be achieved a lot earlier than usual which would be beneficial for both the recruitment and retention of staff. I will keep members updated on the progress of these negotiations.

2.0 **Recommendation/Action**

2.1 The Council is asked to note and approve the attached Pay Policy and its contents regarding the establishment and its pay.

Contact for more Information: Matthew Page, Corporate Manager for People, Governance and Waste, James Hamblin, Operations Manager Human Resources, Cllr Bob Deed Leader of the Council

Circulation of the Report: Cabinet Member seen and approved yes – Cllr Bob Deed, Cabinet, Leadership Team seen and approved yes

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Human Resources Policy

Version Control Sheet

Title: Pay Policy 2022

Reference No: **HR/**

Purpose: The Localism Act requires that all local authorities publish a Pay Policy on an annual basis. The Policy should be agreed by a meeting of Council and be published on the Council's website.

The purpose of having a Pay Policy is so that the pay and related rewards structure of the Council is transparent.

Owner: **Corporate Manager for People, Governance and Waste**
mpage@middevon.gov.uk

Date: Feb 2023
Version Number: 7

Status: **Final**

Review Frequency: **Every year**

Next review date: **February 2024 to be published by March 2024**

Pay Policy

1. INTRODUCTION

Local authorities must publish a pay policy statement for each financial year. This must be approved by a Council resolution before 31 March each year. The Act specifies a number of elements that must be covered by the statement including: the level and elements of remuneration for each chief officer, remuneration of chief officers on recruitment, increases and additions to remuneration for each chief officer, the use of performance-related pay for chief officers, the use of bonuses for chief officers, the approach to the payment of chief officers on their ceasing to hold office under or to be employed by the authority, and the publication of and access to information relating to remuneration of chief officers.

The specific part of the Localism Act 2011 relating to a pay policy is Section 38 (1). Pay is an emotive issue for staff, Councillors and also for the public at large. Transparency in what and how we pay our senior staff particularly, but also all Council employees is of paramount importance.

A pay policy statement will be updated and taken to full Council each year in February, in this way a clear view of the salaries and benefits paid to the most senior staff at the Council can be tracked.

2. REFERENCES

Equal Pay Act 1970
Equality Act 2010
Localism Act 2011

3. SCOPE

This policy applies to:-

- Chief Executive Officer including Head of Paid Service responsibilities
- Directors, Corporate Managers and Operations Managers/Strategic Managers including Monitoring Officer responsibilities and Section 151 Officer responsibilities

4. POLICY

Clarity in the provision of pay and other benefits is essential to ensure that the Council can attract and retain good calibre employees at all levels but particularly at the most senior level.

In the context of managing scarce public resources, remuneration at all levels within the Council needs to be adequate to secure and retain high-quality

employees dedicated to the service of the public, but at the same time needs to avoid being unnecessarily generous or otherwise excessive.

This pay policy statement applies specifically to chief officers (a term which includes both statutory and non-statutory chief officers which for the purposes of this policy are the Directors, Corporate Management Team, Monitoring Officer) and addresses the legal requirement to set out how the policy for agreement of chief officer remuneration differs to that of other Council employees. For the purposes of this statement this includes:

- **Chief Executive Officer (Head of Paid Service)**
- **Deputy Chief Executive (151)**
- **Director of Corporate Affairs & Business Transformation**
- **Director Of Place**
- **District Solicitor & Monitoring Officer**
- **Corporate Management Team**
- **Operations Manager/Strategic Manager**

The definition of chief officers (as set out in section 43(2) of the Localism Act 2011) is not limited to Directors, Heads of Paid Service or statutory chief officers. It also includes those who are their direct reports (who may or might not be statutory chief officers and those who report directly to non-statutory chief officers (deputy chief officers)).

The metric used for pay dispersion is the multiple of Chief Executive to mean earnings. Tracking this multiple will ensure public service organisations are accountable for the relationship between the pay of their executives and the wider workforce. Through this pay policy statement Mid Devon will track this multiple annually. **(This is shown as Officer Remuneration in the accounts).** This will include;

- the level and elements of remuneration for each chief officer
- the remuneration of the lowest paid employees
- the relationship between the remuneration of its chief officers and other officers
- other specific aspects of chief officer remuneration.

In respect of Officer Remuneration Note in the accounts: It should be noted that this information will relate to the previous year as shown in the annual accounts. This will include;

- Salary, fees and allowances
- Bonuses
- Expenses allowance

- Compensation for loss of employment
- Employers pension contribution
- Any other emoluments

Pay multiple
This is calculated by comparing all taxable earnings for the given year (including base salary, variable pay, bonuses, allowances and the cash value of benefits in kind) for the Chief Executive compared to mean earnings and the lowest paid in the organisation.

Specific Policy Areas
The National Joint Negotiating Committee has previously emphasised that 'it is good governance that local authorities can demonstrate that decisions on pay and reward packages for Chief Executives and chief officers have been made in an open and accountable way.'

The Leader of the Council may recommend to Full Council changes to the remuneration package following an annual review. Any structural changes to the remuneration packages of the Chief Executive or Directors will be subject to Full Council approval.

Salary increases in relation to cost of living will be made in line with National Joint Council recommendations.

The cost of living increase does not apply automatically to the Chief Executive and the Director roles as of 1st April each year. Any increase given to them will take into account the national pay award and will be agreed by the Leader of the Council, having sought the views of the Cabinet, and will be based on performance. The annual assessment/pay award for the Chief Executive and Directors is implemented from 1st July each year in order to allow for reflection on the previous year's performance (salary increases for all other employees continue to take effect from 1st April each year).

The use of market supplements may be applied in certain circumstances but at present are not considered necessary for any senior role.

At present, there are no additional payments made to senior officers which specifically relate to performance such as performance bonuses; neither is there an element of pay which can be enhanced for performance, other than those already mentioned in respect of the Chief Executive and Director roles. Performance issues will be dealt with through the achievement of agreed objectives and appraisal review process.

Any termination payments to chief officers on ceasing office will comply with Mid Devon District Council's Redundancy Policy and no additional payments will be made without the express approval of Full Council.

Through this policy the pay multiple of the Chief Executive will be monitored annually. Should the multiplier between the annual salary paid to a full time employee on the lowest spinal column point and the annual salary paid to the Chief Executive be greater than 10, this will be reported by the Leader of the Council to Full Council for consideration.

Our support for apprenticeships, which may be considered a temporary employment, will not be used to skew the pay multiple metric and will therefore be excluded from the calculation. In order to ensure complete transparency however we have also included the salary of apprentices.

There are no arrangements currently in place for tax and national insurance payments to be paid other than through the normal channels, i.e. through the normal PAYE route for all officers of the Council.

5. PAYMENT OF RETURNING OFFICER

Additional payments are set and made by Central Government to officers carrying out additional duties at elections. These payments will only be received when elections take place and although fixed, do vary according to the type of election for which the payment is made. These payments are not within the scope of this policy.

6. OUTCOMES

In having this policy Mid Devon District Council will ensure that the process for setting pay at a senior level is transparent. This policy will be reviewed annually to track the relationship of chief officer pay with the rest of the workforce.

7. PERFORMANCE MONITORING

Annual monitoring of this policy will take place in February. Monitoring of the Chief Executive's performance takes place through an annual appraisal process. This is supplemented by mid-year reviews.

8. POLICY/STRATEGY CONSULTATION

This policy will be agreed with the Council's Leadership Team, Cabinet and Full Council.

9. EQUALITY IMPACT CONSIDERATIONS

The principles of equal pay are integral to this policy. 'Equal work' is defined as:

- Like work where the woman and the man are doing the same job or
- Work rated as equivalent where the 2 jobs are different but have been evaluated by the employer's job evaluation scheme (JES) at the same level/grade or
- Work of equal value where the jobs are again different but an argument is made that both jobs should be regarded as being of equal value or worth.

10. RESPONSIBILITIES

The Corporate Manager for People, Governance and Waste will be responsible for this policy and for updating information on an annual basis.

11. RECORDS

Documents and records generated as a result of the application of this policy will be held electronically and retained as legally required.

All records will be maintained and processed in compliance with the Data Protection Act.

12. DOCUMENT HISTORY

Date	Version	Update
10/02/2017	1	Pay Policy
05/04/2018	2	Pay Policy
07/02/2019	3	Pay Policy
13/02/2020	4	Pay Policy
Feb 2021	5	Pay Policy
Feb 2022	6	Pay Policy
Feb 2023	7	Pay Policy

1. The level of remuneration for all officers earning over £50,000 is shown below:

Post Title	Remuneration	
	2022/23	2021/22
Chief Executive	£118,549	£116,624
Deputy Chief Executive (S151)	£87,027	£85,102
Director of Corporate Affairs and Business Transformation	£85,358	£83,433
Director of Place	£85,358	£83,433
District Solicitor and Monitoring Officer	Grade P £68,687 to £72,773	Grade P £66,672 to £70,848
Corporate Manager Public Health, Regulation & Housing	Grade N £58,904 to £62,392	Grade N £56,979 to £60,467
Corporate Manager People, Governance & Waste	Grade N £58,904 to £62,392	Grade N £56,979 to £60,467
Corporate Manager Digital Transformation & Customer Engagement	Grade N £58,904 to £62,392	Grade N £56,979 to £60,467
Corporate Manager Property, Leisure & Climate Change	Grade N £58,904 to £62,392	Grade N £56,979 to £60,467
Corporate Manager Income, Benefits & Recovery	Grade N £58,904 to £62,392	Grade N £56,979 to £60,467
Corporate Manager Financial Services	Grade N £58,904 to £62,392	Grade N £56,979 to £60,467
Operations Manager Property Services (From 14/12/2022)	Grade L £50,579 to £53,534	
Operations Manager StreetScene and Open Spaces	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609
Operations Manager Housing Services	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609

Post Title	Remuneration	
Operations Manager Human Resources (From 01/05/2022)	Grade L £50,579 to £53,534	
Operations Manager Performance & Governance (From 10/10/2022)	Grade L £50,579 to £53,534	
Operations Manager Revenues Benefits & Recovery	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609
Operations Manager Building Services	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609
Operations Manager ICT Services	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609
Operations Manager Public Health	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609
Operations Manager Leisure Services	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609
Strategic Manager Growth, Economy & Delivery	Grade L £50,579 to £53,534	Grade L £48,654 to £51,609

2. The full time remuneration of the lowest paid employee.

Post Title	Remuneration		Other Allowances	
	2022/23	2021/22	2022/23	2021/22
Recreation Assistant (FOH)	£21,575	£18,562	None	None
Apprentice	£16,206	£14,277	None	None

The lowest paid employees in the 21/22 tax year were the Recreation assistants in the Leisure Service. During the 22/23 tax year, these roles have been re-evaluated and are now graded the same as a refuse loader.

The apprentice rate has been uplifted to £8.40 per hour for the 2022/23 tax year.

3. The multiplier of the remuneration of the Chief Executive based upon taxable earnings.

Category	Total Remuneration	
	2022/23	2021/22
Pay multiple of Chief Executive to Mean	4.28	4.35
Pay multiple of Chief executive to lowest paid FT employee	5.49 (based on Recreation Assistant) 7.32 (based on apprentice rate)	6.19 (based on Recreation Assistant) 8.05(based on apprentice rate)
Annual Mean Pay of all employees (Total Salaries/Number of contracts)	£27,724	£25,415

Officer Remuneration Note in Accounts

Publication of Officers Remuneration
We are required to publish the following information in respect of officer remunerations:

a) The number of employees whose remuneration in the year was greater or equal to £50,000, grouped in rising bands of £5,000.

b) An analysis by job title of the remuneration and employer's pension contributions in respect of senior employees whose salary is £50,000 or more per year (or by name and job title where the salary is £150,000 per year)

4. Officers' Emoluments

This table includes all statutory and non-statutory posts whose overall remuneration exceeds £50k excluding pension contributions and non-taxable allowances as published in MDDC Statement of Accounts - Draft (Pre Audit) 21-22 (middevon.gov.uk)

	2021/22		2020/21	
Remuneration Band	**Number of Employees**	**Left During Year**	**Number of Employees**	**Left During Year**
£50,000 - £54,999	**5**	**0**	**3**	**0**
£55,000 - £59,999	**2**	**0**	**4**	**0**
£60,000 - £64,999	**4**	**0**	**1**	**1**
£65,000 - £69,999	**0**	**0**	**2**	**0**
£70,000 - £74,999	**0**	**0**	**0**	**0**
£75,000 - £79,999	**0**	**0**	**0**	**0**
£80,000 - £84,999	**2**	**0**	**3**	**1**
£85,000 - £89,999	**0**	**0**	**0**	**0**
£95,000 - £99,999	**0**	**0**	**0**	**0**
£100,000 - £104,999	**0**	**0**	**0**	**0**
£105,000 - £109,999	**0**	**0**	**0**	**0**
£110,000 - £114,999	**0**	**0**	**1**	**0**
£115,000 - £119,999	**1**	**0**	**0**	**0**

The above table includes two employees who received a termination payment in 2021/22. These employees are included in the Termination Benefit note. Nine employees in the above table are not Senior Officers so have not been included in the Senior Officers table, all other employees are included.

In completing the 2021/22 Accounts we have complied with the statutory instrument regarding officer emoluments. The statutory instrument requires the individual naming of any Officers with an annual salary of £150,000 or more and the post title of any officers earning £50,000 or more who occupy statutory roles or are responsible for managing the strategic direction of services.

The Council had no officers earning at or in excess of £150,000 in 2021/22.

5 Termination Benefits

2021/22	Number of	Number of	Total number	Total cost of

Exit Package Cost Band	Compulsory redundancies	Other Departures Agreed	Of exit Packages by Cost band	Exit packages in each band £'000
£0 - £19,999	2	9	11	65
£20,000-£39,000	-	0	0	0
£40,000-£59,999	0	0	0	0
£60,000-£79,999	0	0	0	0
Total	**2**	**9**	**11**	**65**

During 2021/22 a number of settlement agreements were made. These were associated with service restructures and changes in order to reduce future employee costs. This helps match ongoing expenditure against the well documented cuts in Central Government funding.

6 Gender Pay Gap

6.1 Pay quartiles by gender

The Mid Devon District Council figures set out below have been calculated using the standard methodologies used in the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

Under the law, men and women must receive equal pay for:

- the same or broadly similar work;
- work rated as equivalent under a job evaluation scheme; or
- work of equal value.

Quartile	Males	Females	Description
1	60%	40%	Includes all employees whose standard hourly rate places them at or below the lower quartile
2	36%	64%	Includes all employees whose standard hourly rate places them above the lower quartile but at or below the median
3	44%	56%	Includes all employees whose standard hourly rate places them above the median but at or below the upper quartile
4	46%	54%	Includes all employees whose standard hourly rate places them above the upper quartile

6.2 Mid Devon District Council's Gender Pay Gap

	Mean Average Hourly Rate	Median Average Hourly Rate
Male	£14.38	£12.92
Female	£14.36	£12.92

HMRC % gap	**0.139082%**	**0%**

The mean gender pay gap for the whole economy (according to the October 2022 Office for National Statistics (ONS) Annual Survey of Hours and Earnings (ASHE) figures) is 15.4%; at 0.139082% Mid Devon District Council's mean gender pay gap is, therefore, significantly lower than that for the whole economy.

PAY SUPPLEMENT POLICY

1. INTRODUCTION

This Policy contains the agreed approach to be taken in the application, monitoring and review of pay supplements within Mid Devon District Council.

Pay supplements incorporate mechanisms for managing recruitment, retention and market related issues by temporarily increasing the total pay awarded to a post (without altering the job evaluation determined grade for that post) when it can be shown that the salary range attached to the grade is significantly lower than those offered by a competitor and therefore it impacts adversely on the ability to recruit or retain staff. They also cover methods of recognition and reward.

During times of specific upheaval and change, it may be necessary to secure the delivery of key services and moreover, to retain a particular skill set within the authority using retention payments, market supplements, acting up payments and honorarium.

The objectives of this Policy are:-

- To recruit the best possible staff for each post and enable the Council to mitigate against any adverse impact on its ability to compete in the local labour market by looking at pay supplement payments

- To facilitate flexibility to resource the Council whilst ensuring compliance with equal pay legislation, achieving transparency and adopting best practice.

- To secure the consistent delivery of key services to the public that may be at risk by giving the ability to retain key post holders.

- To manage the usage of pay supplements responsibly with an aim to ensure that it does not create excessive or unnecessary pay disharmony.

This policy will be attached to the annual Pay Policy which is a statutory submission each year to be approved by both the Cabinet and Full Council.

2. SCOPE

This Policy applies to all Mid Devon District Council employees. Supplements are only considered where all reasonable methods to improve recruitment or

retention have been exhausted, and / or there is considerable risk to service delivery. Pay supplements will always be considered against the needs of the specific role as opposed to the post holder.

3. MARKET SUPPLEMENTS

A market supplement payment is paid in addition to basic salary for a specific individual post or cluster of identical posts. It may be paid where a post has been identified as 'hard to fill' and the Council is prevented from being able to recruit and/or retain existing staff on the salary determined by the Council's job evaluation scheme.

Payment will be:

- used in exceptional circumstances only
- mindful of any equal pay/value considerations, in order to avoid/minimise the potential for challenge on this point
- made as a clearly identified supplement with properly documented supporting reasons, for the amount of payment
- time limited in its application ie the guaranteed period will be up to a maximum of 12 months
- subject to regular monitoring and review
- pensionable
- applicable to all individuals appointed to the post

Any case for the payment of a market supplement must be properly justified, with supporting evidence from the following range of criteria:

- Evidence of a difficulty to recruit or pay related retention difficulties, together with market pay data
- Turnover rates
- Market based salary comparisons with competing local/regional/national employers (both public and private sector)
- Evidence that other retention initiatives have been explored/exhausted (e.g. learning and development opportunities, promoting non-pay benefits)
- Assessment of the impact of a failure to maintain adequate staffing levels in order to ensure service delivery requirements are met
- Consideration of the impact on other existing staff within the defined job group
- Robust budget impact assessment

In addition to the criteria above, account should be taken of the wider employment context applicable to the occupational group and whether the payment of the market supplement will address the particular issues underlying the retention difficulties, or whether alternative/additional actions are required.

For example:

- Are the difficulties an indicator of other issues of concern within the service/occupational group, which can be more appropriately resolved by other management action and/or non-pay measures?
- Is there a regional/national shortage for which new/alternative training schemes would be a more appropriate solution?
- Are there more appropriate ways of resourcing/delivering the service rather than through an in house workforce?

The amount of the market supplement will not be greater than 15% of the top of the salary range for the post.

Market supplements, and the conditions applicable to them, shall be clearly set out and separately identified in any job advertisement and offer/appointment letter.

Market supplement reviews will be undertaken in the following circumstances:

- At least three months prior to the end of the guaranteed period, Human Resources will instruct the Line Manager to commence the review of the market place related to that post and present the findings to the Pay and Grading Group no later than six weeks prior to the end of the guaranteed period.
- If a review indicates that the market supplement is no longer justified, it will be withdrawn. Employees will receive a minimum of one months' notice if the market supplement is being withdrawn and the reasons for this decision.
- Failure to present the findings of the review to the pay and grading group within six weeks of the end of the Guarantee Period will result in the withdrawal of the pay supplement with 1 months' notice.

4. RETENTION PAYMENTS

Deferred retention payments are paid after an agreed period of employment has been completed, and will only be authorised on the basis of the provision of robust evidence amounting to a material factor (suitable for defending any potential equal pay claims). The following evidence will be required as a minimum:

- defined skills or knowledge of an individual not available elsewhere within the authority which are deemed essential to service delivery, or other equitable material differential
- a written offer of employment with another employer, including details of the terms and conditions being offered
- reasons for leaving are clearly related to remuneration / job security, and not other factors such as dissatisfaction with role, manager, team or organisation
- evidence that other measures have been explored, together with the impact on the team.

Payments may be made at the end of a given period, or staggered throughout the specified period of retention.

Requests can only be brought by management, and will have to satisfy the Pay and Grading Group that there is not an Equal Pay issue. A clear business case detailing the significant impact on service delivery will be required for submission to the Pay and Grading Group following authorisation by Director or the Chief Executive.

Managers will also need to include information in their business case as to why a retention payment is more applicable than a market supplement before any payment can be approved.

Retention payments will be subject to the appropriate contractual conditions being met, e.g. remaining within the Council's employment for a specified period and/or the completion of specific tasks. Individuals will be required to sign an agreement to this effect.

The amount of a deferred retention payment will not be greater than 10% of substantive salary.

These payments will made in addition to the individual's normal salary but will be subject to the normal income deductions in respect of tax and National Insurance. They are not pensionable.

If a deferred payment is made in stages and not at the end of the period and an individual leaves the Council within the agreed period of operation of the payment, the individual will be required to pay back all monies received under the scheme, except in the circumstances set out in below.

If an individual leaves the Council because of illness, injury, disability or redundancy, the member of staff will not be required to refund payment

During the specified period when a retention payment is being made a Manager will be required to manage the risk of the employee leaving by undertaking the necessary measures such as ensuring the employee shares their knowledge with other colleagues and/or undertaking recruitment to the role.

If a retention payment is being proposed that relates to a Director then the CEO, the Leader of the Council, the relevant Cabinet Member and the Corporate Manager with responsibility for People will need to agree and sign off any proposal. This will then be sent to SW Councils for independent evaluation and ratification.

If a retention payment is being proposed that relates to the CEO, then the Leader of the Council, the relevant Cabinet Member, Chairman and the Corporate Manager with responsibility for People will need to agree and sign off any proposal. This will then be sent to SW Councils for independent evaluation and ratification.

Payments, their structure (e.g. payment before or after the retention period) and the criteria are subject to the needs of the authority. Therefore discretion can be

exercised by the relevant service director, such as proposing payments, in limited scenarios (e.g. the risk faced by the Council in not acting) whereby not all criteria are met.

6. INCREMENTAL PROGRESSION

The Council's financial rules provide Operational Managers and above with delegated powers to place an individual on the spinal column point of their choosing, provided it is within the evaluated grade for the post, and follows satisfactory performance.

In support of this delegated authority, and in order to ensure that equal pay is maintained the determination of an individual spinal column point either at the commencement of employment in the job role or at any other time will be based on objective material factor criteria as follows:-

- Possession of skills, knowledge, experience or qualifications beyond those which are essential to the job which will enhance performance in the role
- Demonstrable accelerated growth in the role beyond that expected (attainment of skills/knowledge/experience).
- An alternative to a retention payment or market supplement where the criteria for such payments is met.

In the event that an employee has not met their performance targets in line with their annual appraisal or has not been working to the required standard of work they will not be awarded a pay increase, and this will be reviewed again in the following year.

For appointments effective between 1 October and 31 March inclusive, the next increment will be six months after the effective date and then 1 April thereafter.

Subsequent increments are achieved when there has been a demonstration of high performance against the expectations of the role. Any incremental pay progression will be awarded to employees once this has been evidenced through the annual pay review.

The annual performance review is an opportunity for managers and their staff to review performance throughout the year and make a judgement as to whether a pay increase will be awarded. If a pay increase is not awarded then the manager will be required to give specific details about any performance shortfalls, and provide the employee with specific targets and support. In certain circumstances where an informal process has not reached a solution this may proceed to a capability process.

Any incremental pay increases will be payable on 1 April. Pay increases will no longer be awarded once the employee has reached the top of the pay scale for their role.

7. HONORARIUM PAYMENTS

An honorarium payment may be made to an employee who is undertaking duties of a higher level than those for which they are graded. This can be related to:

- covering a vacancy
- covering an ongoing absence within the department (such as long term sickness, but not annual leave)
- undertaking work on an ongoing basis which is over and above that expected for the grade of the post
- *a special project/activity – work outside normal scope of duties*

Any honorarium paid should not only be for a justifiable reason, but also clearly calculated. The payment, which is pensionable, should be calculated as follows:-

Extra responsibilities for between 6-8 weeks
For the first 6-8 weeks this is considered as a development opportunity offered without payment. As with any request for a staff member to take on extra responsibilities the extent of the duties will need to be clearly confirmed, and the member of the staff has the right to decline the opportunity. It is crucial that this aspect is confirmed in advance of any extra responsibilities being proposed.

Extra responsibilities for over 8 weeks
Any staff who have responsibilities longer than 8 weeks should receive an acting up allowance to the equivalent of 10% of their current salary if it is work at their grade. If duties are belonging to a role of a higher grade the staff member will receive 10% of the salary of the role being covered.

*Payments being awarded in respect to the above should be for no longer than 12 months as per the CMT principle adopted in 2020.

Extra responsibilities for a period longer than 12 months
If there is a requirement for additional duties to be taken for a period longer than 12 months then a formal evaluation of the staff members role will need to be considered which may lead to a formal restructure within the department.

In accordance with the Council's financial rules, the Line Manager must obtain approval prior to the confirmation of any honorarium by making a request using the Honorarium Payment Approval Form, which must be completed and signed off by themselves and the Operational Manager/Director. This should then be forwarded to Human Resources. Staff are not able to put themselves forward for an honorarium.

8. PROCESS FOR APPROVAL

In order to maintain the integrity of our Job Evaluation scheme, requests for market supplements, retention payments, and honoraria are all subject to additional approval by the Pay and Grading Group. Any such requests will be

submitted for consideration at the next available meeting of the Pay and Grading Group following receipt of the authorised request.

All requests must be made on the appropriate application form and all supporting documentation must be attached. Business cases which propose market supplements, retention payments and honorariums must be robust in order to provide a defence against an equal pay claim.

9. RESPONSIBILITIES

Managers are responsible for making the business case, including carrying out any research, completing the necessary application form and obtaining the necessary level of authorisation prior to submitting the request to Human Resources.

Managers are responsible for ensuring that any proposals in respect of incremental progression and honoraria can be met from their own budget. There will be a central budget for market supplement/retention payments, which will be controlled by Human Resources.

The Pay and Grading Group are responsible for approving market supplements, retention payments and honoraria.

Human Resources will ensure that all the necessary paperwork and information has been submitted, provide the check and balance arrangements in respect of that supporting evidence, ensure that any payments are supported with an objective justification, and will specifically be responsible for identifying reasons for leaving upon receipt of requests for retention payments. Human Resources will review this policy annually to ensure continued relevance.

Human Resources will be responsible for providing an annual summary of:

- the number of applications under each strand of this Policy
- the number of applications approved under this Policy
- the breakdown of applications approved by gender

to the Pay and Grading Group. Data monitoring the application of incremental progression will be reported to each Pay and Grading Group meeting, and annually to the Corporate Negotiation and Joint Consultative Committee.

10. RECORDS

Documents and records generated as a result of the application of this policy will be retained permanently on the individuals personnel file.

Records of will be held permanently on the Council's HR and Payroll information systems.

All records will be maintained and processed in compliance with the Data Protection Act.

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Appendix 3 – Scheme of Delegation

Special Severance Payments

In line with guidance published by the Department for Levelling Up, Housing & Communities, Mid Devon District Council has the following approval process for payments deemed 'Special Severance Payments'.

Monetary Amount	**Approval By**
> £100,000	Approved by a vote of full council, as set out in the Localism Act 2011
> £20,000 but < £100,000	Must be personally approved and signed off by the Head of Paid Service, with a clear record of the Leader's approval and that of any others who have signed off the payment
< £20,000	Must be approved according to the local authority's scheme of delegation. It is expected that local authorities should publish their policy and process for approving these payments

At MDDC our local scheme of delegation for Special Severance Payments requires approval and sign off by our Head of Paid Service and S151 Officer, with advice sought from the Monitoring Officer where appropriate.

Where the proposed payment is to the Head of Paid Service (Chief Executive), to avoid a conflict of interest it is expected that the payment should be approved by a panel including at least two independent persons.

As part of their duties, an authority's s151 Officer, and where appropriate, the Monitoring Officer, should take a close interest in and be able to justify any special severance payments that are made by that authority and in particular any payments made that are not consistent with the content of this guidance.

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CABINET
7 FEBRUARY 2023

ESTABLISHMENT

Cabinet Member:	Clive Eginton, Deputy Leader and Cabinet Member for the Working Environment and Support Services
Responsible Officer(s):	Matthew Page, Corporate Manager for People, Governance and Waste James Hamblin, Operations Manager Human Resources

Reason for Report: To give Members an update on both the Establishment of the Council together with its performance. This report should be read in conjunction with the functions of individual officers highlighted in the Constitution. This builds upon information shared in February 2022 and September 2022.

RECOMMENDATION: The Cabinet is asked to recommend to Council the contents of the below report.

Financial Implications: Financial risk will only occur where the structure of a service changes without adherence to allocated budgets.

Budget and Policy Framework: This report sits within the current budget and policy framework.

Legal Implications: In accordance with Article 14 of the Constitution.

Risk Assessment: If the Establishment is not appropriately managed and reviewed then service delivery may be put at risk.

Equality Impact Assessment: No equality issues are highlighted in this report.

Relationship to Corporate Plan: This report highlights the Establishment figures and, as such, supports our aim to reduce costs without affecting service quality and continuity.

Impact on Climate Change: No climate change issues are highlighted in this report.

1.0 Introduction/Background

1.1 The purpose of this report is to provide an update on the performance of our workforce as we continue to move out of the COVID-19 pandemic and into Spring 2023.

1.2 These items include updates on the key Establishment indicators of sickness and agency expenditure, turnover and the impact of COVID-19 on our workforce.

1.3 Scrutiny of this data has been enhanced throughout 2022 as we developed the service quarterly performance review report and subsequent meeting. As outlined in the February 2022 Establishment Report, these meetings are attended by the Corporate Manager, Service Lead (if applicable), HR Business

Partner and Accountant. These meetings are also supported by monthly updates on workforce data provided at our Corporate Performance Meeting and shared with both the Corporate Management and Leadership teams.

2.0 Sickness Absence, Agency Expenditure and Establishment

2.1 Last year (2021/2022) MDDC had an average of 7.82 sickness days per FTE. This compares to 5.58 sickness days that were lost per FTE in 2020/21 and 8.10 sickness days that were lost per FTE in 2019/2020. Within our current policy, the aim set for each employee is not to exceed 6 days of absence in a rolling 12 month period. It should be noted that there will be a difference between FTE and per employee statistics, however the statistics show a dip in sickness during the pandemic. See Graph 1.

2.2 Acknowledging absence levels since 2019, an updated policy and training for managers is due to be rolled out in 2023. However it should be noted that absence levels faced at the Council track closely with both local and national feedback on sickness absence levels. As predicted in the September 2022 Scrutiny Report, an increase in absence is unsurprising as the workforce have not been exposed to illnesses which have been supressed over the last 2 years.

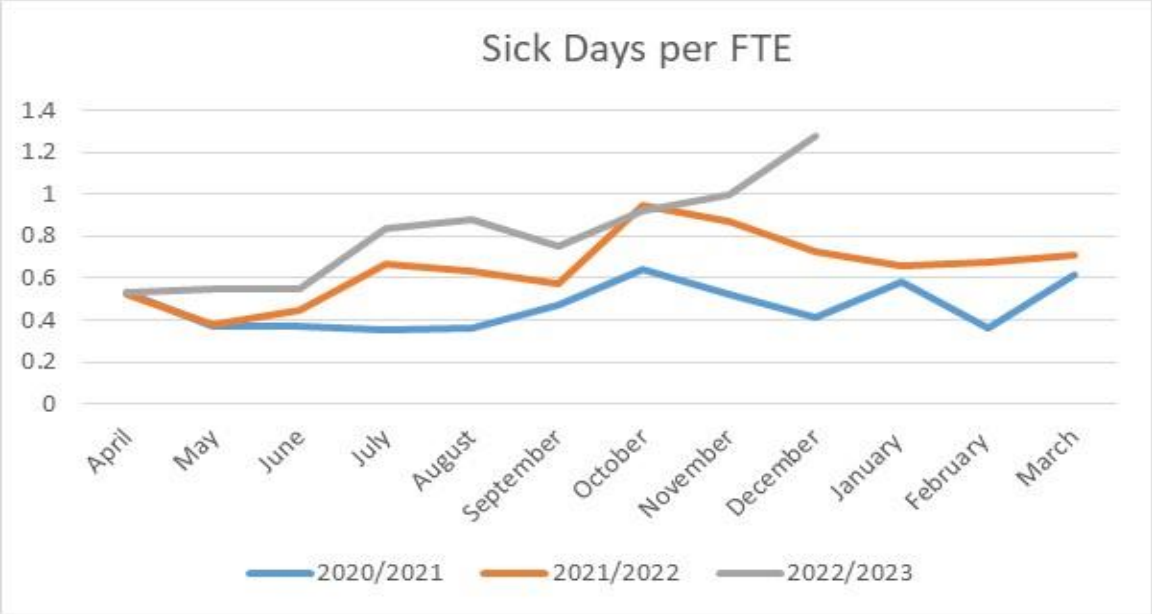
2.3 In house management training has been rolled out in 2022, with managers able to access both live and recorded sessions on the following: 'Managing Difficult Conversations', 'Managing Poor Performance' and 'Investigations, Disciplinaries and Grievances'. Feedback from the sessions has shown content has been well received with confidence in managers increasing as a result of the information provided. An underlying theme of all training provided in house is to encourage early intervention by managers.

2.4 In the first three quarters of this financial year we recorded 7.30 days sickness absence per FTE. As a result we are currently in line to see sickness absence levels this year in excess of 2019/2020. Projections would suggest we end 2022/2023 with approximately 9.73 days lost per FTE. Our sickness absence is usually less in the first two quarters of the financial year than in the last two due to the Autumn and Winter seasons and we are still seeing substantial employee absence due to COVID-19 and related infections (referenced in Section 4.0).

2.5 Wellbeing and supportive measures for employees have been highlighted throughout 2022, as we look to encourage employees to take positive action. A heavily discounted Leisure membership has been rolled out to employees at the Council (circa 50% of the public fees), as well as, a one off wellbeing day and there being increased communication regarding our Employee Assistance Programme. A review of our Wellbeing Ambassador initiative is due in 2023 as we look to provide clarity on the support we have in place for employees, alongside the existing mental health first aider scheme, Employee Assistance Programme and occupational health support.

2.6 The Council offered all staff under 50 a free voucher for a flu vaccination, acknowledging the current sickness levels and in order to prevent future sickness absence in the workforce. Despite regular advertisement of the benefit, uptake has been low to date.

2.7 Following the all staff survey in Autumn 2021 to gauge opinion and feedback on key organisational performance indicators including communication, leadership, development and wellbeing, the subsequent action plan is still in focus with the next round of all staff briefings due in early 2023. A further all staff survey is scheduled for Summer 2023.



Graph 1. Sickness at MDDC 2020 - 2023

2.8 In October 2022 a benefits survey was rolled out to employees at the Council. The aim was to understand what benefits employees currently value and understand, as well as, what benefits they would like the Council to consider in the future. As a result of the survey, a 'Benefits Overview' is being published in January 2023. This will highlight the existing benefits employees at the Council can already access and it will be used as part of our recruitment literature.

2.9 An ongoing challenge, further cemented by the impact of sickness absence levels, has been our access to temporary/agency workers. Costs of temporary/agency workers has been steadily increasing, as nationally we see high levels of employment against a backdrop of record high levels of vacancies.

2.10 During the first three quarters of 2022/23 the organisation spent £723,879.98 on agency workers. This compared to a total spend in 2021/22 of £823,288.55, £576,368.28 in 2020/21 and £534,378.49 in 2019/20. Projections using our existing figures would suggest we end 2022/2023 with approximately £965,173.31 in agency spend. Table 1 outlines agency spend since 2019.

2.11 There is an underlying theme within our agency make up, as we move away from 'lower cost/higher volume' agency workers (e.g. Waste and Recycling) to 'higher cost/lower volume' agency workers (e.g. Planning). The use of agency workers has been brought under further scrutiny as we continuously review our Establishment and seek to improve processes to allow for greater rigour and

challenge regarding staffing (e.g. the updated Vacancy Approval Process and Workforce Review Group rolled out in December 2022).

Year	Agency Spend	YOY Change (+/-)
2019/2020	£534,378.49	
2020/2021	£576,368.28	+7.56%
2021/2022	£823,288.55	+35.28%
2022/2023	£965,173.31*	+15.87%*

**9 months data grossed up to 12 months*

Table 1. Agency Spend 2019 - 2022

2.12 Table 2 compares the Establishment for the Council and the associated costs from 2019/2020 to 2022/2023. Costs for 2022/2023 will include the flat payment made to employees following the completion of Pay Award negotiations that was confirmed in November 2022. Work is already underway for the 2023/2024 Pay Award, with Unions expected to confirm their expectations at the end of January 2023. This comes against a backdrop of increased industrial action across sectors in the UK and ongoing negotiations highlighted within the media.

	2019/2020	2020/21	2021/22	2022/23*
Total number of employees /workers paid	718	697	728	698
Establishment FTE	422.11	422.79	426.43	431.02
Total Taxable Gross Pay	£11,170,336.78	£11,515,324.63	£12,197,334.88	£12,802,503.87*
Employers NI	£1,024,710.32	£1,038,135.28	£1,126,244.53	£1,288,737.39*
Employers Pension	£1,595,839.06	£1,832,713.73	£1,938,973.16	£2,103,271.45*

**9 months data grossed up to 12 months*

Table 2. Establishment 2019 - 2023

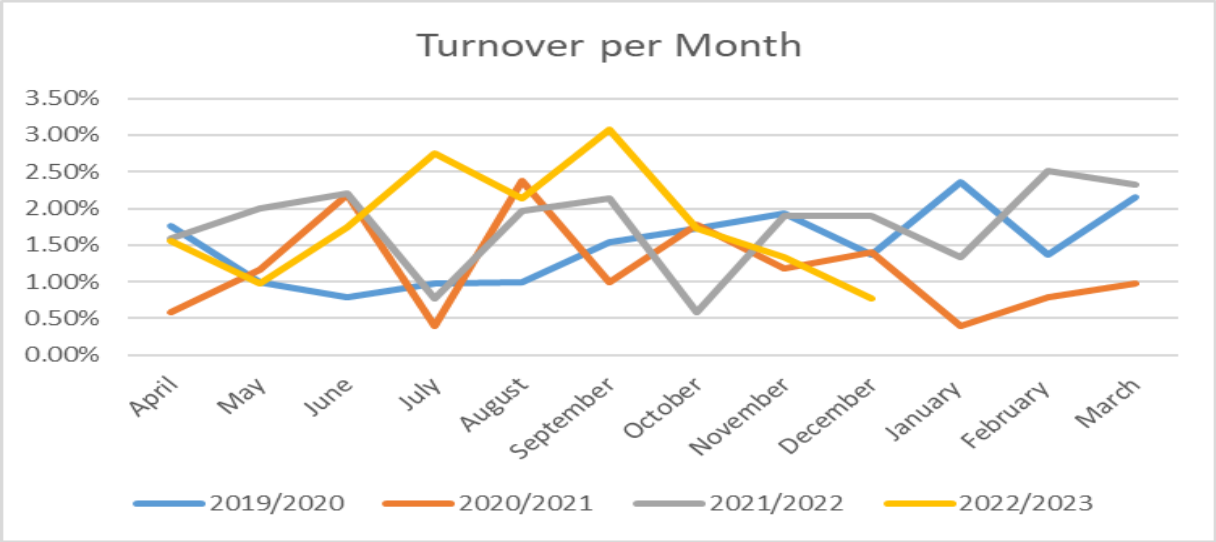
3.0 Turnover

3.1 Turnover for the first three financial quarters (1 April to 31 December 2022) stands at 16.07%. This compares to a turnover of 2021/22 in 21.25%, 14.23% in 2020/21 and 17.98% in 2019/20. Graph 2 highlights turnover per month since 2019 with estimates, based on current turnover, suggesting we end the current financial year with a turnover of 21.42%.

3.2 A full breakdown of all leavers and data collected during exit interviews for the last financial year is shown in Appendix 1. For those that completed the exit interview, career progression was cited as the main reason for leaving. Appendix 2 highlights the reasons for leaving during quarters 1 to 3 of 2022/2023.

3.3 A new exit interview format is launching in February 2023, with a focus on collating data in a more efficient and effective way. The new exit interview will allow for greater learning from those that are departing the Council and this, in turn, can help formulate more informed decision making and action planning.

3.4 Mid Devon, like other local authorities, has faced increasing challenges over turnover due to a number of different external factors. In terms of manual work the lack of supply of European workers has hit different industries hard which has had the result of increased competition for drivers, loaders and other types of worker amongst different sectors. In some sectors a movement towards 'contractor' work rather than 'employed' work has been supported by record levels of vacancies across the UK as workers attempt to earn more money in the current cost of living crisis.



Graph 2. Turnover at MDDC 2019 - 2023

3.5 These challenges have brought into sharp focus the need to consider our longer term employment offer for potential applicants. Key aspects include promoting our benefits (as will be seen with the 'Benefits Overview' document in January 2023) and encouraging greater flexible working where it is possible to do so (as has been seen in our roll out of hybrid working in 2022). Whilst delayed, the launch in 2023 of the skills review will allow for the Council to understand the skills and knowledge gaps within services and contribute to succession planning.

3.6 Apprenticeships across services are supporting the 'grow your own talent' initiative at the Council. The Council supported the 'KickStart' initiative in 2022, however this government scheme has subsequently come to a conclusion. The Council continues to maximise the apprenticeship levy by utilising this for both those joining the Council as an 'apprentice' and those currently employed by the Council but who are developing further skills/knowledge through training accessed via the levy.

3.7 In June 2022 the Council was award the Petroc Employer of the Year Award. This reflects the ongoing work with educational providers to ensure the Council is an employer of choice for those entering the workplace.

3.8 Our work around the Evolve learning and development project continues to develop. This round of Appraisal/PDR has been completed with a 94% response rate achieved. Guidance on the new appraisal process has been shared with our Leadership Team, Corporate Management Team and Service

Leads, as we extend the appraisal window this year due to significant events scheduled later this year (e.g. local elections).

4.0 COVID-19

4.1 The Council continued to enforce protective measures in line with the Government guidance. As these were phased out in 2022, employees returned to their 'normal' place of work. Feedback, as highlighted in the all staff survey, has been largely supportive of the communication and measures put in place to protect staff during the pandemic.

4.2 As is referenced within the sickness absence reporting in Section 2.0, COVID-19 does still significantly contribute to sickness absence. In December 2022, 92 days were lost due to COVID-19 accounting for 14.9% of all absence in the month. As responsibility for testing and the associated costs are held by the employee, the actual amount of sickness absence due to COVID-19 is likely to be higher.

5.0 Conclusion and Recommendations

5.1 There are a number of priorities which the Corporate Manager for People, Governance and Waste wants to focus on in terms of our Establishment performance.

5.2 It is vital that we continue to plan, review and scrutinise business continuity plans in the face of the challenges brought by the high levels of sickness absence. This should run in parallel with continued scrutiny of our Establishment through mechanisms such as the Workforce Review Group.

5.3 We continue to instil best employment practice and benefits, using the information obtained through the all staff survey action plan and findings from other surveys (e.g. Benefits Survey). We are committed to communicating with employees to keep them updated with business developments and changes.

5.4 We will review the skills analysis once completed to understand the gaps we have as an organisation and use this data to support long term succession planning at the Council. This needs to run in parallel with our focus on growing our own talent (e.g. apprenticeships) vs hiring talent vs developing existing talent.

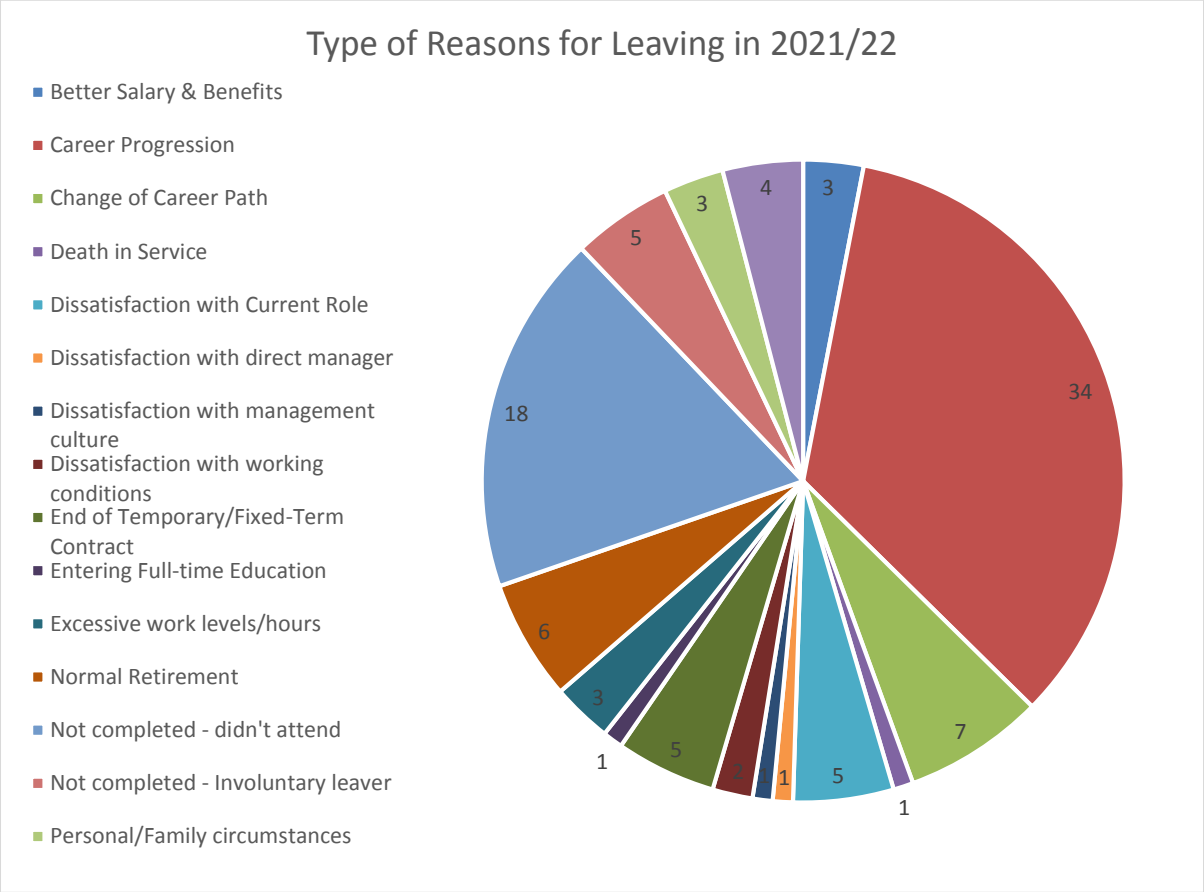
5.5 As a result of the above our overarching long term focus is simplified as follows: Getting the right people, with the right skills, in the right roles, performing at the right level at the right time.

Contact for more Information: Matthew Page, Corporate Manager for People, Governance and Waste (MPage@middevon.gov.uk), James Hamblin, Operations Manager Human Resources (JHamblin@middevon.gov.uk)

Circulation of the Report: The Cabinet Member has seen and approved the report. Cllr Clive Eginton Deputy Leader and Cabinet Member for the Working Environment and Support Services

List of Background Papers: Previous Establishment Reports taken to both Scrutiny and Cabinet in 2020, 2021 and 2022

Appendix 1



Type of Reasons for Leaving 2021/22	
Better Salary & Benefits	3
Career Progression	34
Change of Career Path	7
Death in Service	1
Dissatisfaction with Current Role	5
Dissatisfaction with direct manager	1
Dissatisfaction with management culture	1
Dissatisfaction with working conditions	2
End of Temporary/Fixed-Term Contract	5
Entering Full-time Education	1
Excessive work levels/hours	3
Normal Retirement	6
Not completed - didn't attend	18
Not completed - Involuntary leaver	5
Personal/Family circumstances	3
Travel	4

Appendix 2

Quarter 1 to Quarter 3 2022 – Reasons for Leaving

Reason	Total	%
Better salary & benefits	1	1.19
Career Progression	19	22.62
Change of Career Path	2	2.38
Dissatisfaction with current role	2	2.38
Dissatisfaction with management culture	1	1.19
Dissatisfaction with working conditions	2	2.38
End of Temporary/Fixed Term contract	1	1.19
Excessive work levels/hours	2	2.38
Normal Retirement	3	3.57
Not completed - didn't attend	37	44.05
Not completed - didn't return from sick	1	1.19
Not completed - involuntary leaver	5	5.95
Other.	2	2.38
Personal/Family circumstances	6	7.14
Grand Total	**84**	**100**

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CABINET
7 February 2023

NNDR 1 for 2023/24

Cabinet Member: Cllr Bob Deed
Responsible Officer: Andrew Jarrett - Deputy Chief Executive (S151)

Reason for Report: To provide Members with an update of the income generation and financial implications of the number of Business Rate properties in Mid Devon and to approve the NNDR1 (estimated income to be generated in 2023/24 from business rates). There is a statutory deadline for notifying Precepting Authorities and the Government by 31 January 2023 of their appropriate shares in accordance with the Non Domestic Rating (Rates Retention) Regulations 2013 Regulation 2(b). The Government return has been submitted and Preceptors informed of the estimated income.

RECOMMENDATIONS:

1. **That the calculation of the NNDR1 net yield of £16,921,552 from 3,519 Business Rated properties is noted for 2023/24;**

2. **That the proportions distributed to the respective authorities and Central Government be allocated as per the statutory regulations; and**

3. **That Members note that Central Government will reimburse the Council through a Section 31 grant to compensate it for the reduction in collectable business rates as a result of introducing various reliefs under section 47.**

Relationship to Corporate Plan: This report sets out the estimated net business rates for 2023/24; the estimate will then be used in the calculation of future Council business rates budgets. This report is in line with the Council's Corporate Plan objectives and is essential to delivering the necessary funding to balance the 2023/24 General Fund Revenue budget.

Financial Implications: Mid Devon District Council is a Statutory Billing Authority and has a duty to carry out this task each year as part of the budgetary process. Although no resolution is required as with Council Tax Charges.

Legal Implications: This is a statutory function and is a legal requirement. The Council must set its budget annually based on the Council Tax tax base and the projected NNDR1 values.

Risk Assessment: If the Council fails to carry out this duty, then it will not be able to forecast its future budget positions. The calculation of the NNDR1 involves a number of estimates made by professional officers, but due to the volatility and uncertainty of Business Rates appeals and Central Government retention policies, the Council holds a Business Rates Smoothing Reserve which can be used to mitigate fluctuations in Business Rates receipts.

Equality Impact Assessment: No equality issues identified for this report.

Climate Change Assessment: No climate change issues identified for this report.

1. Introduction

1.1. Councils must submit a return known as the NNDR1 form to the Department for Levelling Up, Housing and Communities (DLUHC). This form provides the local tax base for business properties in the area for the forthcoming year and determines the value of income from Non-Domestic Rates between Central Government, Mid Devon District Council and the Devon and Somerset Fire & Rescue Authority. As such the NNDR1 form is a key document in the budget setting process.

1.2. The NNDR1 form must be certified by the Section 151 Officer. Councils are expected to adopt a similar approval process used for the Council Tax Base, i.e. approval by Council.

2. Business Rates Retention Scheme

2.1. Prior to 1 April 2013, all billing authorities collected the business rates in their area and passed this money onto a Central Government pool. The pool was then redistributed to local authorities throughout the country based on their needs, resources and the services they provide to their community. For example, one billing authority may collect £15m and only require £10m to run its services, whereas another billing authority may collect £10m and require £15m to run its services. The shortfall and excess was then redistributed by Central Government through a fixed sum as part of the Formula Grant Settlement.

2.2. From 1 April 2013, Central Government changed the way this financing is distributed. Each billing authority now has to forecast the amount of revenue it will generate from business rates and then redistribute that income between Central Government, the County Council, the Fire Authority and itself, based on a centrally prescribed formula (see below).

2.3. The Business Rates Retention Scheme as it is now known, also allows the billing authority to keep a share of the increase in revenue it generates, therefore encouraging billing authorities to encourage business growth in its area. However, the converse of this applies and if a billing authority's business rates decline, the District Council (i.e. MDDC) will see a proportionate drop in revenue.

2.4. This is the key difference between the old and new schemes. As under the old business rates scheme, the level of funding was determined at the beginning of the year and was fixed thereafter, thereby protecting billing authorities.

2.5. In order to assist local authorities in retaining revenue within the counties, Central Government allowed Upper Tier Councils (Unitary and County Councils) and Lower Tier Councils (District Councils) to join together to pool their growth and offset the growth of one area against a decline in another area. Effectively, this

creates a larger critical mass across the county to alleviate exposure to individual authority losses, thus enabling Counties and Districts to retain more of the rates collected instead of contributing this money to the central pool.

2.6. Mid Devon District Council joined the Devon County-wide pool in 2014 and will remain in the pool for 2023/24 to maximise the amount of Business Rates it can retain.

2.7. This report details the calculations necessary to determine the estimated debit the Council is expected to collect in business rates for the 2023/24 year. The net collectable debit is then split proportionally in accordance with the provisions of the Local Government Finance Settlement issued in December 2020 which enables the whole of Devon to have a 50% rates retention, subject to tariffs / Top-ups and levies. The tier split for Devon is as follows:

- 9% is distributed to Devon County Council
- 40% is kept by Mid Devon District Council
- 1% is distributed to the Devon & Somerset Fire & Rescue Authority

2.8. The new 2023 Valuation list takes effect from 1st April 2023. By law rateable values need to be reviewed every 3 years, it was 5 years. Then table at 2.9 helps illustrate some of the movements in the list.

2.9.

List	**Rateable Value (RV)**
2023 Draft List Rateable Value 09/01/2023	£52,776,105
2017 List as at 04/01/2023	£46,827,209
Gross RV Increase	**£5,948,896**
% Gross RV Increase	**12.70%**

MDDC Property Estimate Gross RV	**Gross RV**
2017 List	£1,393,465
2023 List	£1,485,855
Increase	**£92,390**

Top 15 RV Movement	**Gross RV**
2017 List	£8,254,000
2023 List	**£9,040,000**
Increase	**£786,000**

3. S31 Grant Reliefs (funded reliefs)

3.1. The Government provides grants to Councils under Section 31 (S31) of the Local Government Act 2003 (LGA 2003) for a wide range of purposes. Within the Business Rates service area, S31 grants are provided to recompense the Council for a range of reliefs such as, including the Small Business Rate Relief,

Retail, Hospitality and Leisure schemes, Supporting Small Business Relief, Public Toilets and Rural Rate (50%) top up.

3.2. Part 2, line 45 (fund reliefs) of the NNDR1 is estimated to be £2,753,762, S31 will be applied to pay back the cost at MDDC share (40%). This is largely due to the Government's announcement to continue the relief available to Retail, Hospitality and Leisure businesses in 2023/24 at a rate of 75%. Other reliefs apply.

4. 2023/24 Forecast Yield

4.1. The Council is notionally able to keep 40% of the total business rates it collects and this would generate an estimated £6,768,621 (less Tariff and Levy). MDDC gets £120,580 as a cost of collecting the years' business rates and will continue to retain the estimated income from renewable energy schemes of £254,906 in 2023/24.

4.2. Prudent forecast are included for the possibility of losing income as a result of a business appealing its Rateable Value, or for non-payment of the charge.

5. Changes being introduced for 2023/24

5.1. A new Supporting Small Business Scheme is being introduced with effect from the 1st April 2023 whereby increases in charge due to loss or reduction of either Small Business Rate Relief or Rural Rate Relief will be capped at £600 annually. Those on SSBR whose 2023 rateable values are £51,000 or more will not be liable to pay the supplement (1.3p) to fund Small Business Rate relief while they are eligible for 2023 SSBR.

5.2. There will be no downward Transitional Relief for properties that have had a reduction in rateable value; they will receive the full benefit of the reduction. Additional New Burdens funding will be available to help meet the cost of undertaking the additional work.

6. Conclusion

6.1. Due to the associated volatility and significant sums of revenue involved, we will continue to maintain a Business Rates Smoothing Reserve and provide Members with regular updates on the level of business rates being collected during 2023/24.

Contact for more information: Andrew Jarrett, Deputy Chief Executive (S151)
01884 234242 (ajarrett@middevon.gov.uk)

Dean Emery, Corporate Manager for Revenues, Benefits, Corporate Recovery, Planning (DM),

Corporate Fraud, Corporate Recovery and Welfare, Forward Planning & Economic Development
01884 234328
demery@middevon.gov.uk

Circulation of the Report: Leadership Team, Cabinet

Background Papers: NNDR1

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NATIONAL NON-DOMESTIC RATES RETURN - NNDR1
2023-24

All figures must be entered in whole £

If you are content with your answers please return this form to DLUHC as soon as possible

Ver 1.1

Local Authority : Mid Devon

PART 4: ESTIMATED COLLECTION FUND BALANCE

This section estimates the collection fund closing balance for the current year (*not* the forecast year otherwise referred to in this form). Please refer to guidance notes for details. Note that you can edit the blue-bordered cells, but you will be asked to provide a comment explaining why they are changed from the prepopulated figures.

	£	£
OPENING BALANCE		
1. Opening Balance (From Collection Fund Statement)		-4,347,784
BUSINESS RATES CREDITS AND CHARGES		
2. Business rates credited and charged to the Collection Fund in 2022-23 (enter as +ve)	14,619,476	
3. Sums written off in excess of the allowance for non-collection (enter as -ve)	-1	
4. Changes to the allowance for non-collection	-90,240	
5. Amounts charged against the provision for alteration of lists and appeals following RV list changes (enter as +ve)	181,345	
6. Changes to the provision for alteration of lists and appeals	-181,345	
7. Total business rates credits and charges (Total lines 2 to 6)		14,529,234
OTHER RATES RETENTION SCHEME CREDITS (enter as +ve)		
8. Transitional protection payments received, or to be received in 2022-23	0	
9. Transfers/payments to the Collection Fund for end-year reconciliations	0	
10. Transfers/payments into the Collection Fund in 2022-23 in respect of a previous year's deficit	4,145,706	
11. Total Other Credits (Total lines 8 to 10)		4,145,706
OTHER RATES RETENTION SCHEME CHARGES (enter as -ve)		
12. Transitional protection payments made, or to be made, in 2022-23	-15,591	
13. Payments made, or to be made, to the Secretary of State in respect of the central share in 2022-23	-7,199,343	
14 Payments made, or to be made to, major precepting authorities in respect of business rates income in 2022-23	-1,439,869	
15. Transfers made, or to be made, to the billing authority's General Fund in respect of business rates income in 2022-23	-5,759,474	
16. Transfers made, or to be made, to the billing authority's General Fund; and payments made, or to be made, to a precepting authority in respect of disregarded amounts in 2022-23	-324,656	
17. Transfers/payments from the Collection Fund for end-year reconciliations	-36,043	
18. Transfers/payments made from the Collection Fund in 2022-23 in respect of a previous year's surplus	0	
19. Total Other Charges (Total lines 12 to 18)		-14,774,976

ESTIMATED SURPLUS/(DEFICIT) ON COLLECTION FUND IN RESPECT OF FINANCIAL YEAR 2022-23 - Surplus (positive), Deficit (Negative)

	£
20. Opening balance plus total credits, less total charges (Total lines 1, 7, 11,19)	-447,820

APPORTIONMENT OF ESTIMATED SURPLUS / DEFICIT (See Note N)

	Column 1 **Central Government**	Column 2 **Mid Devon**	Column 3 **Devon County Council**
21. % for distribution of prior year surplus/deficit (i.e. 2021-22)	50%	40%	9%
22. Total prior year surplus (+)/deficit (-)	-101,039	-80,831	-18,187
of which:			
22a. Amount deferred in respect of estimated 2020-21 surplus-deficit	-190,026	-152,020	-34,205
22b. Amount in respect of 2021-22	88,987	71,189	16,018
23. % for distribution of in-year surplus/deficit (i.e. 2022-23)	50%	40%	9%
24. In year surplus (+)/deficit (-)	-122,871	-98,297	-22,117
25. Total (total lines 22 and 24)	-223,910	-179,128	-40,304

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CABINET **AGENDA ITEM**
7 FEBRUARY 2022

EAST CULLOMPTON MASTERPLAN SPD

Cabinet Member Cllr Richard Chesterton
Responsible Officer Richard Marsh, Director of Place

Reason for Report: To inform members of the outcome of the public consultation and to consider the draft masterplan that has subsequently been produced taking these comments into account, and to seek a recommendation to Council to adopt the revised East Masterplan Supplementary Planning Document (SPD).

RECOMMENDATION:

1. **That Members note the comments received at the Stage 2 public consultation (Appendix 1) and proposed changes set out in Appendix 2.**

2. **That the Cabinet recommend to Council that the Masterplan Supplementary Planning Document for East Cullompton (Appendix 3), which incorporates changes made following the Stage 2 public consultation, be adopted.**

3. **That delegated authority be given to the Director of Place to amend and finalise the document to reflect any agreed changes following Planning Policy Advisory Group and Cabinet meetings.**

Financial Implications: The consultant contract was awarded following a procurement process. The cost of the contract is funded through Homes England capacity funding. There will be no financial implications arising from adoption of the document as it adds detail to existing planning policies only.

Budget and Policy Framework: The budget for the production of the SPD utilises Homes England capacity funding (see Financial Implications).

The Mid Devon Local Plan 2013-2033 requires strategic allocations to have an adopted Masterplan SPD in place before planning permission can be granted. Once adopted, the revised and updated Masterplan would have Supplementary Planning Document status and will be a material consideration for planning decision making purposes in relation to the East Cullompton allocation.

Legal Implications: The process for preparing and adopting the draft Masterplan SPD is in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement.

Risk Assessment: Policy sets out that masterplanning should take place before applications are submitted. Delay in adoption of the Masterplan SPD could in turn delay the delivery of housing on the site as well as affect the confidence of land owners to promote their land. Adoption of the masterplan will provide greater planning certainty and assist the site coming forward for delivery.

If the Masterplan SPD is not adopted, the Council may become vulnerable to planning applications being submitted which do not accord with the Council's aspirations for the East Cullompton and could lead to uncoordinated development which would not meet the Council's quality aspirations.

Equality Impact Assessment: No equality issues are identified for this report.

Impact on Climate Change: The draft Masterplan SPD has regard to climate change within the confines of adopted planning policy. A Supplementary Planning Document cannot introduce new policies, or expand on existing adopted policy, but the SPD does expect developers to follow the guidance set out within the document when assessing the carbon impacts of their proposals.

Relationship to Corporate Plan: The draft Masterplan SPD will provide guidance on the planning and delivery of a strategic site for Mid Devon. The draft Masterplan SPD directly relates to all four Corporate Plan 2020-24 priorities: Homes, Environment, Economy and Community.

1.0 INTRODUCTION

1.1 A draft Masterplan SPD for East Cullompton was approved for consultation at the 9 August 2022 Cabinet meeting and public consultation took place between 21 September and 1 November 2022. The consultation included 6 staffed events at Cullompton Farmers' Market, The Walronds, Cullompton, Cullompton Tesco, Kentisbeare Village Hall (x 2) and Willand Village Hall. There were also display boards at The Hayridge, Cullompton and Kentisbeare Village Hall, and a dedicated consultation website. The consultation was advertised by letter, press release, posters and on social media.

2.0 CONSULTATION RESPONSES

2.1 There were 6,928 website visits during the consultation period, most directed from a search engine, the Culm Garden Village website, Facebook or QR codes.

2.2 A total of 207 people attended the staffed events.

2.3 A total of 52 people commented via the consultation website. In addition, 20 emailed public responses and 2 completed paper questionnaires were received, as well as 7 responses from landowners/promoters.

2.4 Consultation responses were also received from Cullompton Town Council, Kentisbeare Parish Council and Bradninch Town Council, Devon County Council, Historic England, Network Rail, Lead Local Flood Authority, Natural England, National Grid, National Highways, Sport England, Environment Agency and Blackdown Hills AONB.

2.5 Details of all responses received are included in **Appendix 1**.

2.6 Some of the responses related to issues that are outside of the scope of the SPD, the focus of which is to add detail to existing Local Plan policies. These

responses included comments on the wider garden village proposals that will be subject to consideration in the Council's emerging Local Plan, and changes to the triggers for infrastructure delivery that are either set out in Local Plan policies, or subject to parallel workstreams.

2.7 Where the responses relate to detail in the SPD, the document has been amended to reflect these responses wherever this would improve the document and better reflect consultee requirements and aspirations. Where changes have not been made, these decisions have been justified. **Appendix 2** is a summary table of changes requested with commentary on whether or not the changes have been made.

2.8 The revised Masterplan SPD document following public consultation is attached at **Appendix 3**.

3.0 REVISIONS TO DRAFT MASTERPLAN SPD FOLLOWING CONSULTATION

3.1 The following key revisions have been made to the draft Masterplan SPD as a result of the consultation. Please also see the table at **Appendix 2** for full details of the changes made and not made.

3.2 A373 Honiton Road. Following advice from Devon County Council Highway Authority, references to a 20mph speed limit along Honiton Road have been deleted as this is not achievable for an A road. The SPD retains the need for further technical work to be carried out and the emphasis on the need for design solutions to slow speeds.

3.3 Town Centre Relief Road. The text has been updated to reflect the policy position that the TCRR must be delivered before occupation of new homes within the urban extension. This is subject to any changes arising from the Junction 28 capacity modelling currently being carried out by Devon County Council and any further technical work agreed by Devon County Council to demonstrate higher or lower capacities.

3.4 Road network. Link to Kingsmill Industrial Estate added and text updated to clarify that streets could take a different alignment to those shown in the Masterplan, subject to preferred junction location.

3.5 Active travel. Approach to delivery of active travel crossings between East Cullompton and Cullompton clarified. Infrastructure delivery table amended to include delivery of active travel in early phases and in line with capacity improvements to J28.

3.6 Primary school. Text amended to include flexibility on location of primary school to north or south of Honiton Road and addition of requirement for safe school access and appropriate space for drop off away from primary streets.

3.7 Healthcare. Text added to expand on potential uses within community hub and multi-use community building, including a health hub. Officers are in discussion with the NHS about healthcare provision within East Cullompton.

3.8 Fordmore Farm community hub. Text clarified to explain why Fordmore will be principal centre, that it will expand to provide broader range of uses including further retail and community space, that it will be accessible (via primary street and active travel) and that it would have potential to expand further if proposals for the wider garden village proceed. Further explanation added on what community hubs should contain and that some residential will be permitted within community hubs where it does not detract from intended character or limit community hub functions.

3.9 Commercial area. Text changed from 'integrating employment' to 'integrating commercial' to make it clearer that appropriate retail will be permitted in the commercial area. The text already refers to appropriately scaled retail being provided in this area. This is to allow larger scale retail uses where these are not appropriate within the community hubs.

3.10 Sports and leisure. Text amended to confirm size of space at Fordmore Farm is sufficient to provide a multi-pitch hub rather than individual pitches but final location of sports pitches to be confirmed through planning applications. SPD makes specific reference to sports being provided in accordance with MDDC's Playing Pitch Strategy. Reference to community buildings to include catering for a range of indoor sports and activities.

3.11 Green space. Text expanded on green space uses, including allotments and what can be included within the community greens and green corridors. Community growing space such as orchards in community greens and traditional allotment sites provided separately within strategic GI. Changes made to make clearer the requirement that detailed proposals demonstrate an appropriate building and landscape treatment to rural edge.

3.12 Fords. Following representation from the Environment Agency, text has been amended so that fords are not prioritised, but the aspiration for some fords to be included as crossings to remain to reflect the placemaking principle of celebrating water, with the requirement for alternative routes to be available and signage to ensure safety.

3.13 Self-build. Additional text on self-build added as guidance for developers.

3.14 Pylons. Text changed to include a 10m green corridor above any undergrounded electricity lines and wording added that where powerlines are undergrounded, they do not have to follow the existing overhead line which could allow better accommodation of easements.

3.15 Heritage. Maps to be changed to refer to indicative settings of heritage assets with further assessment required for planning applications. SPD strengthened to specify further work required by developers prior to their layouts being set. Text changes made to archaeological assessment.

3.16 Biodiversity net gain. Wording changed so that the off-site BNG can be delivered in suitable areas that provide accessible greenspace for the allocation or adjacent to the allocation boundary. Text changed to expand the explanation of the country park.

3.17 Country park. This is outside the area for the East Cullompton Masterplan SPD but could start to be delivered through off-site biodiversity net gain and sports facilities.

3.18 Process. Process diagram not sufficiently clear on where Design Code and Phasing and Infrastructure Delivery Plan fit within the planning process. The diagram has been updated and the approach to both these documents clarified. Both documents will need to be agreed developed and agreed with landowners / developers. The text on the Design Code within the body of the SPD has been updated and expanded to clarify the strategic nature of this document. Appendix 1 setting out the Design Code contents has been deleted.

4.0 PLANNING POLICY ADVISORY GROUP

4.0 A draft of this Cabinet report and Appendices, including the revised Masterplan SPD, was taken to Planning Policy Advisory Group (PPAG) on 17 January 2022. PPAG approved the draft East Cullompton Masterplan SPD to be taken to Cabinet on 7 February 2023 with no amendments.

4.0 HRA/SEA SCREENING

4.1 A Habitat Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) is required in accordance with Regulations and Directives on any plan or programme prepared for town and country planning or land use purposes and which sets the framework for future development consent of certain projects. Planning Practice Guidance states that SPDs do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan. Officers do not consider that the East Cullompton Masterplan SPD would have significant environmental effects that were not identified during preparation of the Local Plan.

4.2 However, for completeness, HRA and SEA reports were prepared as part of the public consultation material. The screening reports indicate that the draft Masterplan SPD is 'unlikely to have significant effects on the environment' not already assessed through the preparation of the Local Plan.

4.1 Historic England has commented that the draft SPD does identify the risk of harm to heritage assets. However, given the small number of heritage assets concerned, they consider that undertaking a full SEA would be a disproportionate task to ensure the protection of the heritage assets. A reasonable alternative would be a discrete study that focused on the small number of affected assets. A thorough and focused study would obviate the need for a full SEA.

4.2 An initial heritage assessment was undertaken to inform the SPD and the SPD identifies areas where there is a risk of harm to heritage assets and requires that as planning applications come forward, developers will be expected to fully consider the impacts on these heritage assets including through the submission of a heritage chapter in their accompanying Environmental Statement. Officers

are continuing to engage with Historic England to ensure the ongoing approach to heritage is robust, but do not consider that a full SEA is necessary.

4.3 Natural England has commented that based on the information provided, they concur that there are unlikely to be significant environmental effects from the proposed SPD that have not already been assessed within the Sustainability Appraisal of the adopted Mid Devon Local Plan 2013 - 2033.

4.4 In relation to the HRA screening, whilst Natural England agrees that it is likely that the SPD will not have an adverse effect on the integrity of European sites, they would advise that the reasons for reaching this conclusion should include consideration of whether the SPD provides the design framework needed to ensure that all the mitigation measures identified as necessary in the Local Plan HRA will be fully incorporated into the development. The HRA identifies that provision of green space and protection and enhancement of biodiversity sites are likely to mitigate impacts on European sites. The SPD makes provision for both provision of amenity green space habitats and includes a requirement for developers to demonstrate biodiversity net gain. Further assessment will be required by developers through Environmental Impact Assessments to be submitted with planning applications.

5.0 CONCLUSION

5.1 An analysis of the consultation responses has been undertaken and amendments made the draft Masterplan SPD. Once adopted, the revised Masterplan SPD will provide an updated framework to guide development in a coordinated and comprehensive manner and will have full weight in decision making as a material planning consideration.

APPENDICES

Appendix 1: Consultation responses
Appendix 2: Summary table of changes requested with commentary on whether or not the changes have been made
Appendix 3: Revised draft East Cullompton Masterplan SPD

Contact for more information Tina Maryan, Area Planning Officer
01884 234336
tmaryan@middevon.gov.uk

Background Papers Cabinet report 9 August 2022
Agenda for Cabinet on Tuesday, 9th August, 2022, 10.00 am - MIDDEVON.GOV.UK

Background documents on the Culm Garden Village website
Home | Culm Garden Village

Circulation of the Report	Councillor Richard Chesterton, Cabinet Member for Planning & Regeneration

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Appendix 1 - Answers to survey questions

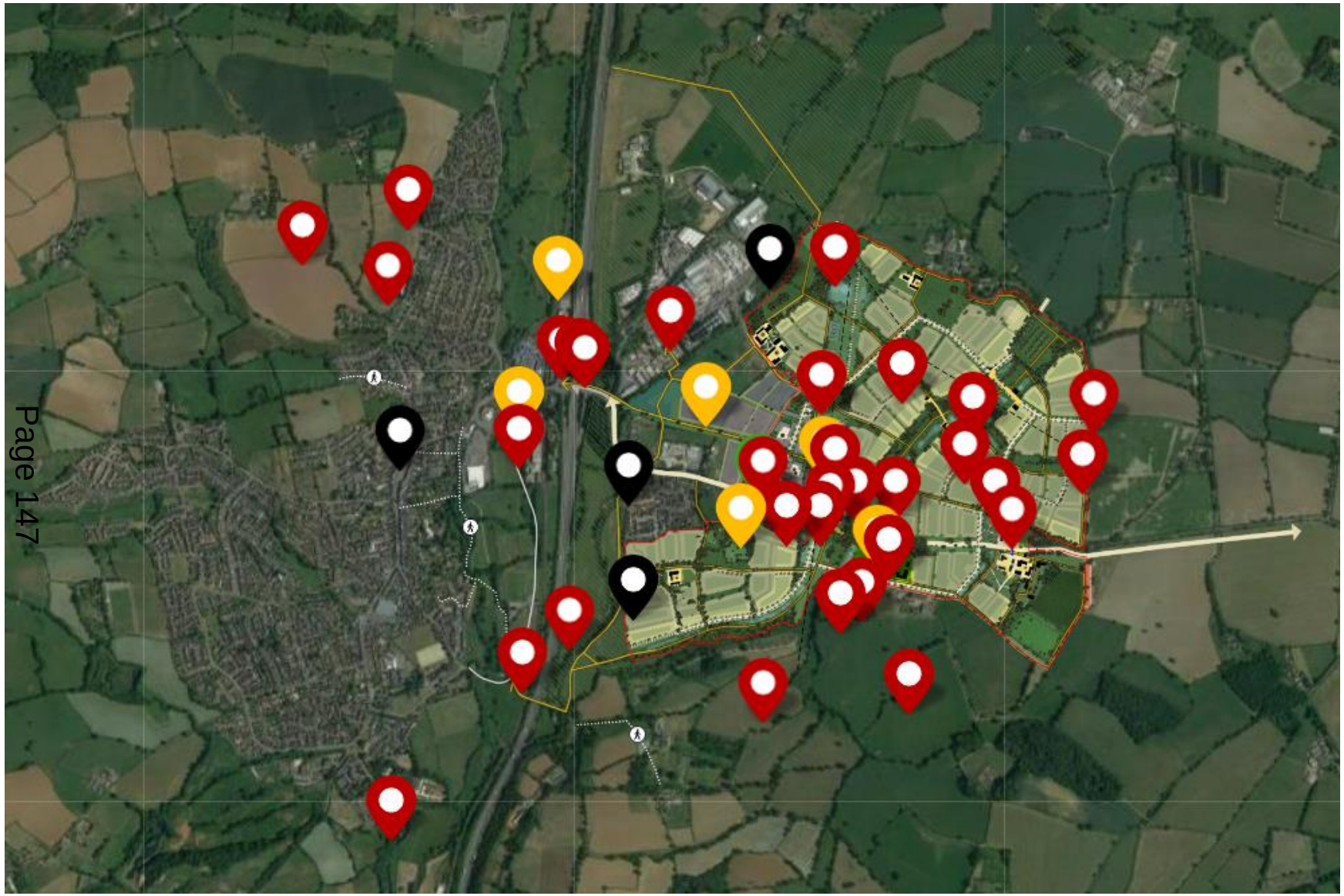
Category	Question	Transport	General Development	Facilities	GI/BI/Landscape/Sustainability	Flooding
Planning for a different future	What are your views on the opportunities and challenges that the Masterplan is seeking to respond to?	I have no issue at all with the general idea of this as I fully understand the need for new homes and work opportunities. As a resident of Culm Lea, I do however, have a problem with the additional traffic that this will create along Honiton Road towards the motorway which even now, if often queued way past Mole Valley. I therefore want to know what is going to happen around junction 28 to prevent the whole of Cullompton being totally gridlocked	Unless its for local people only , then it is a complete con trick. Saving the environment by building more housing ? I think that is the thickest statement for a long time! And what is Mid Devon District Council doing getting involved when the area is under the jurisdiction of East Devon District Council?	Sustainability. All new buildings, regardless of who will own it, should be net zero for their whole life which includes being run by renewable energy. Facilities should be designed to complement Cullompton's existing facilities which serve the existing residents. It's short sighted to remove these so currently happy residents move out to better places. A hardstanding multi-use pitch would be good. We don't have anywhere kids can learn to ride their bikes, rollerblading, basketball etc. The skate park gets too busy for everyone.	For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.	Point 3 is critical but the major issues will be a] surface water run-off from the massively increased paved areas - how will development mitigate against combined sewers being overloaded? b] have the Sud's schemes been definitively costed and who will manage the maintenance of these schemes once the development work has been created? c] has the high water table across the development site been fully recognized? d] has modelling been done to ensure that East Cullompton development doesn't create any "backing-up" issues for villages upstream (notably Kentisbeare where there was a flood event in 2012? Points 4 and 5 are well made and hopefully the Connecting the Culm project will ensure that high quality nature-based solutions will be at the forefront of planning to ensure that flood-risk is properly mitigates across the whole development site but also in the River Ken.
		All these changes would require a major change to the road network of the area. The main Honiton Road which runs through this site was not considered adequate for a recycle centre back in 2013, there is now more traffic flow and congestion on this road and the development is being allowed to start prior to any upgrade work to the road network. This will result in even more congestion particularly at J28 of the M5, with no promise of the road improvements actually being undertaken. The plan to start the development around the Fordmore Farm development will encourage more traffic along the main Honiton route along with construction traffic - how is this planned on being dealt with?	I think the key challenge that the plan needs to respond to is building a community that actually works, and sadly I can't see that at the moment. On the one hand it is meant to be part of Cullompton, and yet with the railway, motorway & river in between this simply will not happen. At the same time the larger "new town" is being built without a central focus, and is in danger of just being urban sprawl extension. The absence of a clear focus/centre does not mean that people will go into Cullompton, but will simply drive into Exeter (or wherever they are working). As yet this village/town/extension doesn't know what it is, and being planned in two stages does not help.	Secondary Schools - I've seen in a couple of the new housing developments primary schools will be built but the secondary school is already over prescribed and where will these primary children go once, they are old enough? We already drive to Willand because the schools in Cullompton were over prescribed. Dentists - we haven't been able to get an appointment in over a year that's only going to get worse. Infrastructure - Personally I find it really hard to believe we've just been moved to three weekly refuse collections to 'aid recycling and reducing carbon foot print' more like we're putting in over 2k in houses and can't afford to collect anymore waste. If it really was about recycling, you'd collect it weekly like they do in West Devon where we moved back from in January. It would be nice to see a new recycling centre in the East Cullompton development where people could recycle cardboard, plastic, metal etc. Overall I'd like to see the reinstatement of the railway and expansion of motorway junction prior to any more developments along with the provision of a new secondary school and green spaces where you can actually walk the dogs off lead and the kids can play. We keep hearing about the jobs and great things the town will get from these developments but as far as I can see we get nothing. No new services, entertainment or resources are being provided for existing residents just ugly large developments of more houses for people to live in and to commute out of a dire boring commuter town with no real community.	Your comments on 'movement of water on the site' 'utilising water courses' is quite comical. Have you seen the state of the local river in Cullompton? It is polluted and horrible. There is a real opportunity to build something which actually responds to the climate emergency and decreasing wildlife but this will take real guts to do. Every house would need to have renewable energy. Large areas around the site should be rewilded. Houses built using sustainable materials. Unfortunately most of these projects only care about making money and not achieving these things.	
		I have concerns about the general infrastructure of the town and its current inability to fully support residents needs let alone adding more large developments. The motorway junctions - these cannot already support the growing traffic coming into what is a commuter town. Cullompton has excellent links to Exeter, Taunton and Bristol being on the M5 corridor. We live in Head Weir and have already seen a significant increase in traffic at peak times in the AM and PM where the cars queue well down Millennium Way and up into town and across the motorway bridge which makes it a nightmare to drive in and out of the town. The railway station could certainly relieve some of this but the need for expansion to the slip ways is inevitable. Sometimes you can queue for over 30 minutes just to get down the hill past the Weary Traveller.	Loss of a small semi-rural town - we were attracted to Cullompton because it was a small, quiet mid Devon town. It will no longer have that nice small communal atmosphere, it's already been over developed, and it feels like we're living in a monopoly board under the thumb of a thirsty development tycoon. So many natural habitats have been destroyed leaving the wildlife with only flood plains to live on and the landscape blighted by ugly new builds that aren't fit for purpose.	Horn Road is within Kentisbeare Parish. Sports facilities should be within Cullompton. The boundary of Kentisbeare Parish should be respected as per S14 of the Local Plan. The 20 minute principle is quoted but then not built into the plan- location of schools, commercial hub, social and care facilities.	There must be a green buffer zone to Kentisbeare to ensure is maintains its identity as a village.	
		Point 2 is critical but the delay to the "ring road" through the CCA fields and the lack of detailed costings (and options) for J28 make the whole connectivity piece incredibly difficult. Hopefully there will be more than one foot-crossing point in the scheme and hopefully one crossing which is pedestrian only.	I believe that this is a great plan for future generations. My family have lived in and around Kentisbeare for at least 7 generations. I have seen much change over the years as has my dad and grandad. The transport links to Kentisbeare are not great and with the plans to include better links it would be so much better for the older generation who can no longer drive and also the younger generation who have not yet learnt to drive. The employment opportunities for young people would then also be greater and the social opportunities for the older generation increased. Unfortunately you will come up against those who have moved into the village from away who suddenly don't like change. Most of those houses they have moved into were not original to the village and have been built over the last 50 years so without that development they would've had nowhere to buy (this includes my own house which was once the site of the milking parlour where my dad had his first job. As a true local person we have to welcome developments and change not for us but for our children and those that follow.	Point 7 seems to allude to the development of the Fordmore site as a community mixed-use hub - this suggests a very strong developer-led bias - why would a significant community hub be sited at the east extremity of the proposed development? The current proposed "community hub" features look particularly weak in the current edition of the masterplan. Point 8 seems aspirational but difficult to deliver as the employment designated land in East Cullompton will inevitably become the focus for employment within the community of East Cullompton (the M5 and J28 being natural barriers).	Point 12 suggests the "need" for a water park (in what is already a rural area has somehow already been established and will therefore take effect - how has the "need" been determined?	
		I would agree with a lot of the opportunities listed, but feel that this is going to be a very expensive development in which developers are going to have to fund large parts of the infrastructure. Infrastructure, in particular the Cullompton Town Centre Relief, changes to junction 28 and Honiton Road need to be addressed before any large scale development takes place. How will Mid Devon District Council get developers to fund infrastructure before large scale housing? If the costs are too high for developers will want change the housing density and cut corners on the environmental issues to make their profits.	I still think there are a number of "issues" with the updated masterplan and sometimes the constant re-iteration of an aspiration won't necessarily result in that aspiration coming into effect. For instance IF the East Cullompton development goes ahead I do NOT feel that there is a good chance of Cullompton and East Cullompton becoming one community and the M5 is a massive barrier to that aspiration. Indeed I think that in years to come East Cullompton is more likely to become like Cranbrook and people will be asking for a new town council for East Cullompton - and the long term projection of housing that might be built will only serve to reinforce this point.	Point 13 seems to go against the idea of creating community - surely the sports pitches should be in the centre of the community not at the eastern extremity - this suggests they are "placed" at the eastern extremity so further future development will surround them? Do the sports pitches encroach into Kentisbeare parish and if they do then the "green buffer" promise is at best being diluted and probably ignored?	The adopted plan did not include any reference to a sports club 'to the east of Horn Road'. This goes over the Kentisbeare Parish boundary and residents have already made clear their opposition to any encroachment into the parish. A desire not to have 'a hard edge' to the end of the proposed Garden village should not include a blurring of boundaries and properly rural areas need to be preserved. Assurances were previously given that there would be a buffer area which would remain as agricultural land.	
			Cullompton and any development East of Cullompton will never be one community - they are separated by a substantial river, an incredibly busy motorway and a high speed railway. Any redevelopment of the motorway junction and road network is already estimated as costing 100's of millions of pounds - this is not a responsible or acceptable use of public money - it will also add a huge amount onto the cost of every house. If by emphasising the movement of water through the site you mean - this is important because you are proposing to build on a flood plain - then this should be viewed as a massive no.. not an opportunity! If this is not what the question means then I have no idea what you mean. There is not meant to be development east of Horn Road, it is totally wrong - ignoring the views of the residents and breaking all trust with them - by proposing sports clubs in the area.	I assume the challenge will be to provide housing for local people however due to its proximity to M5 more people will relocate to the area already over populated for the amenities available. Our hospitals, doctors and dentists are already full to capacity who will provide healthcare with employees already leaving the profession due to low salaries etc.		
			Local homes for local families, not a second home owned place - our countryside is not for that.			
Priorities for growing Cullompton	What are your thoughts on the idea of encouraging more people to walk, cycle and use public transport and providing day to day services and facilities as part of a 20 minute place?	Yes I totally agree but in the winter, walking and cycling are never going to be a feasible option for most people and public transport is ridiculously expensive and again, in winter, it's not much fun hanging around for buses.	Building 2,00 Homes ie extra 6,000 people will not help people walk cycle and use public transport. If you want set up a new cycle track then go ahead but without the extra homes.	The current schooling is already struggling to cope with the existing local population. This new development will definitely need a new primary school to absorb the extra demand. Also, the College Surgery in Cullompton is at capacity. What are the plans for expanding the local medical and dental services?	The Woodland Trust is supportive of sustainable travel. However, it is important that the routes chosen for these networks do not harm irreplaceable habitat or woodland creation sites.	
		After building the inner relief road please pedestrianise Fore Street except for buses and make it one way and re open the railway station with room on trains for bikes.	It's a nice idea... but I don't think it will draw people into Cullompton. People may walk within East Cullompton, but I fear will drive into "old" Cullompton, if they come in at all.	I currently live in Nightingale Lawns and have things within a 20 minute walk. Yet soon I will have to drive to access things like the rugby club so it's all hypocritical. Lots of positive publicity but overall for the people from all of Cullompton, there will be no reduction in travelling time to access facilities. Just new houses near facilities and old ones losing them. Yet the new houses are still too far away from the high street so no-one will have everything now.	Great, please reduce development on the floodplain and above net biodiversity gain + recovery	
		A 20 min cycle is quite far. Encouraging more people to cycle and walk is a must but it must be combined with infrastructure which is fit for purpose. Pavements along quiet roads which are nice to walk on, cycle lanes where the cyclist has priority over cars, undercover storage for bikes at key locations.	20 minutes in principle but not in the plan. Covering agricultural land with houses does not 'reverse the decline in wildlife'. Building 5000 houses does not satisfy 'One urgent priority is the need to move away from places that rely so heavily on people out-commuting by private car each day. It stimulates it!	Admirable, you just have to ensure adequate facilities are provided		
		Encouraging less reliance on the car would be a good thing if public transport was provided and an affordable cost, the reduction in the size of roads will create the same issues of inability for buses, ambulances, emergency vehicles etc to access the site, as seen on numerous developments in the area.	As residents within the delightful village of ' Kentisbeare' we currently enjoy the well-being factor favouring walking cycling, good air quality, low night-time light pollution and surrounding farmland. We do not need a few minutes walk to a park or greenspace with water course as existing natural habitats offer contact with nature. Existing lanes and public footpaths already characterise this area. Protection of the vegetation and local habitats will not be possible if there are to be thousands of additional homes/work units/ schools. Increase in human habitation will impact on the transport pollution, noise and crime levels within the area.	The concept of 20 minute place is a good aspiration - developing the infrastructure so that people don't use the A377 is absolutely crucial. However the current construct seems to have very peripheral community hub designations so where will the "heart" of East Cullompton actually be as Mole Valley and the designated employment space seem to be geographically central but very unlikely to deliver community "heart"		
		It's a great idea in principle but not so practical when you have young children that can't walk far or people with disabilities that may need access to a car/ specialist transport. I would still need a car to commute to places of work but I would walk around town but again if I need to do a full supermarket shop lugging it home isn't practical or if I was to buy something heavy and cumbersome and had to transport it home	I think it is a marketing gimmick - most of the facilities being planned on the edge of the housing development the chances of residents walking or cycling is very remote - any public transport will take many years - the station we are told will have no parking but will be a considerable distance for most residents - and we are told trains only running every couple of hours.			
		Anything that encourages using public transportation and alternatives to cars is very welcome Considering how busy the M5 is currently, I can't see that people won't have the choice but to walk/cycle however the Honiton Road will also be over stretched so safe I don't think so! Public transport how long will it take to open a station at Cullompton and is it really viable?	Excellent idea. But not easy to get to the railway station from the garden village. The development should be located on the west side of the motorway adjacent to the railway station at junction 27, and use the east side of junction 27 for industrial. From there, people could easily walk and cycle to parkway. It's not too late to change the plan!			

Category	Question	Transport	General Development	Facilities	GI/BI/Landscape/Sustainability	Flooding
Priorities for growing Cullompton	Do you agree with the current vision and key principles set out under Planet, People and Place?	I don't necessarily believe that treating Cullompton and East Cullompton as one place will necessarily reduce out commuting or reduce carbon emissions. People will travel out of the area to seek, high skilled, high paid jobs if they cannot be found or developed in Cullompton. On the upside if Cullompton becomes a destination town people will travel in. Village scale for housing, yes, but don't like the idea of compact (could be interpreted as high density).	I think much of it sounds good on paper, making it a reality is a different matter! I expect Cranbrook sounded good on paper!! I see little as yet to foster any sense of community? Are you in conversation with the local church, as they are key community builders?	I agree with the principles but Cullompton shouldn't be developed to the detriment of existing residents. Losing the cricket club and rugby club to the new development in East Cullompton is pointless when they're so well established. There are plenty of houses available nearby should people wish to live near them.	I agree we need more housing, but the infrastructure needs to grow with it. The planet and nature needs to be taken into account to, I agree. Please, please, can all the new housing have solar panels fitted as they are been built? I honestly cannot understand why this is not been done as standard on ALL new housing built in the UK. This alone would get us to Carbon Zero so much quicker.	This site also has a high tendency to flood which will only increase as our climate warms.
			No, when you are prioritising building on green field sites, I could never consider it Planet first, it's more like Pawning the Planet for Profit.	Build a sense of community and sense of belonging around existing activities and uses and around the new village centres. Make them pedestrian-friendly and keep them largely traffic-free. There are no village centres. A village is perhaps 1,000-2,000 people with a hub of shop(s), school, religious buildings, social meeting premises. Where are they all?	I fail to understand how developing this quantity of green field land will encourage and sustain wildlife, with the removal of trees, hedgerows and open quiet spaces, not to mention the removal of vegetation, flowers and berries. I would also like to see developers providing solar panels to ALL buildings as standard practice along with the highest standards of house insulation etc.	Transform water management and habitat creation in this part of the Culm Valley to reduce flooding, increase biodiversity and to make water and wildlife central to day-to-day life in East Cullompton. Not demonstrated by the plan. Wildlife will be driven away and the only water in day to day life will be flooding.
			The principles are fine but are not delivered by the plan. It is a case of window dressing and hiding the true nature of the plan. Regard Cullompton and East Cullompton as one place, make them interdependent and mutually supportive. This will strengthen the local economy, making the town more resilient. It will reduce out-commuting, reduce carbon emissions, improve air quality and reduce noise and dust. The plan is far larger than Old Cullompton with less facilities. Neither the existing or the new show any scope for interdependency. Offer choice and make better homes and workplaces that are flexible and adaptable for changing lifestyles. Build sociable streets and rural lanes that encourage neighbourliness, outdoor living and outdoor play. Make sure everyone is within a few minutes walk of a park or a greenspace or the opportunity to follow or cross a watercourse. This is not supported in the plan. Make it compact and village-scale, combining well-crafted buildings and spaces that are pedestrian-friendly. Make it safe by reducing traffic speeds to 20mph or lower. Bring the scale of infrastructure down with narrower streets and spaces, something more in keeping with a village character. Bring the rural character of East Cullompton alive by incorporating existing rural tracks, the hedgerows and the mature Oak trees that characterise this area. Make the active travel and bus routes between East Cullompton and the town into green lanes that are rural in character. The A373? A Green Lane. Celebrate the presence of water and the crossing of, or the following of, watercourses part of the experience of daily life, such as the route to school or the workplace, or the journey to and from the new station or to the local shops. Nice prose, eloquent dream but really?		I think the principles described in Planet, People and Place are all very laudable but my confidence in these principles actually being delivered is extremely low. Will all housing units be EPC A rated, will developers be mandated to fit Solar PV, solar thermal and ASHP or GSHP in every house unit? Will building regulations be changed to ensure that developers deliver this climate critical change to how houses are being built? Combine locally-sourced clean energy with reduced energy demand and energy- efficient, durable and adaptable buildings. Where is this locally sourced energy coming from? Protect natural resources, including existing vegetation and local soils and local habitats. Reconnect and strengthen local landscapes and increase woodland cover. You cannot protect what you destroy only the margins that are left. Use innovative and modern methods of construction to minimise waste and reduce pollution. Improve human health and well-being by favouring walking and cycling over other modes, improving air and water quality and improving contact with nature. Favouring is a human choice not something you can plot. Building footpaths not roads makes it happen. How does being in the middle of 5000 houses improve contact with nature? One finds natures where humans have not developed.	
			In the current United Kingdom climate, whereupon the cost of living is rising and the availability of numerous food products being affected by trade prices, surely it is more important to retain our farmland (especially in counties/farming areas like Devon) and think about growing more of our own produce to help people, place and planet. Focusing on the town of Cullompton and looking at ways forward to improve the High Street trade should be the first priority before considering the removal of farmland for the possible influx of thousands of additional people! One reason Devon is such a successful tourist focused county is because of the rural areas that attract people during their recreational pursuits, which will be in question should more built up areas evolve mirroring the downfall of some other counties.		Not sure that I could see much evidence, oh yeas some solar panels - however, who cares about our planet let alone country? Our reservoirs are at an all time low - gas and electricity in short supply, yes earth/air heat pumps will aid this crisis but hardly affordable, home prices will be high and with current mortgage rates once again raises the question who will buy these properties. I agree but am concerned that they will not be fully met. The planet section needs to be more radical.	
			No - to all of them - the development will be deeply damaging to the planet and the people in this area of Mid Devon - "Protect natural resources, including existing vegetation and local soils and local habitats. Reconnect and strengthen local landscapes and increase woodland cover." - by building 5000 houses???? That is not possible ! This is not a village it is a town - and it will bring to the area at least 10,000 people and nearly as many cars - the pollution and disruption caused by this can in no way be seen as helping health. Most of these new residents will have to travel to work - it is the wrong development in the wrong place and totally wrong for the planet.			
			It is exactly that, a vision. Like all visions it seeks to create something new and 'wonderful'. Phrases like 'celebrating the presence of water' ignores the realities of rural mud and the other joys of country living. What will be created will be a form of 'sanitised' country living with artificial 'village centres' where actual 'contact with nature' may or may not be a part of daily life. All very admirable.			
East Cullompton Masterplan	What are your views on the masterplan for East Cullompton and the locations of development, open spaces, streets and facilities that are shown?	You still have one major arterial road? How will a huge back up of Honiton Road traffic go?	Complete and Utter Madness . East Devon will end up looking like the West Midlands.	Where are the promised sports facilities within this development?	Preserve the green farmland to the east to create a natural and embedded agricultural buffer zone	
		NONE of this should be built until the traffic issues are resolved. New houses are already being built on the other side of the motorway, and how the roads are going to cope is anyone's guess. I believe there should be a complete moratorium on any new houses until the motorway junction is sorted, the town centre bypass is built, and the railway station reopened.	Initially, Kentisbeare Parish Council boundary had the likelihood of a green buffer zone to limit building lines. However, it would appear that the prospect of a school and other facilities is now encroaching within the boundary and extending up to Dead Lane Cross. How are the Council allowed to extend within the boundary?	The development looks good but it should be additional to the existing facilities in Cullompton and not replacing them. People should be encouraged to be outdoors in all weathers. We need more facilities suitable for use through the winter e.g. hard standing playgrounds/multi use pitches, undercover picnic areas and seating etc.	It's an outrage that so much green space is being given over to housing developments when there is a desperate need to protect against loss of habitat. Over 60 percent of the UK's wildlife biodiversity has been lost and its because of developments like this. This is just propaganda and buzz words designed to lull the public into the weak belief that this is somehow environmentally friendly and not destroying countless eco-systems.	
		How will the additional traffic be managed? A new motorway junction is required under Local Plan Policy but it is impossible to see how this will be afforded for such a small number of houses and Highways England has confirmed it would not fund under RIS because it's not providing a strategic benefit but just supporting the CGV housing estate. Is a garden village actually a garden village if it can only be made to work by such heavy reliance non the motorway? Where is employment development in EC and CGV going to go? Over 80% of working people currently commute out and without significant employment development at Cullompton an even higher percentage will need to commute out - by car, as you can't walk or cycle down the M5 and the alternative routes are largely unsafe for cyclists or people on linked trips taking their children to school and carrying on to work. When is the modelling work showing what is needed going to be publicly available? Rumours are circling that MDDC is trying to achieve what they need by shifting people out of their cars but this is totally unrealistic given how reliant the existing settlement at Cullompton is on private car travel. Highways England have been banging on about needing assessment and significant funding to cope with the predicted traffic but this does not seem to be acknowledged or accepted by MDDC. When are we going to have proper commitment to delivery the road improvements that they say will be needed?	Move it all to the west side of Junction 27 before it's too late.	The primary school has been allocated a space next to the main road this is a dangerous area for young children to be especially early in the morning at commuting time. It will also cause more congestion at drop off and pick up times along an already over used road. There is no allocation for a secondary school is this going to be added in an expansion program to an already large development? I can see no allocation for a doctors surgery or dentist, there are currently not enough of these services in Cullompton and the surrounding areas how is this to be addressed?		
		Road crossings, are they footbridges? The A373 is already experiencing serious overloading and needs careful consideration.	I don't have the internet, so only saw the plans and can't say that they were that enlightening except that this masterplan is eating up all of our lovely countryside. The reason people like to visit our lovely country. Do we really need this 'master plan' - I think not.	Primary school location not at the centre of community		
		No planned expansion of the motorway junctions is also a poor oversight and Stagecoach can't even provide buses to Exeter anymore so are they really going to cover these new routes?	It all looks great. A good balance of areas. As long as the housing development has adequate parking for at least two vehicles per house.	My overall view of this development is that East Cullompton will become a separate community from the existing town of Cullompton and all the connectivity promised will NOT deliver a single community or growth for the existing town. With respect to the current masterplan the main weakness is the lack of a real community hub at the centre of the proposed development with 3 small hubs being in peripheral locations.		
		Primary school is off Honiton Road which will increase traffic and congestion along Honiton Road as will the primary and secondary streets exiting onto Honiton Road. The location of the school is not central to the development and will not encourage those living further away to walk. They will use a car.		I am sorry to be negative again - but the attached map is almost impossible to decipher - all I can see is that the mixed community hubs appear to be on the edge of the proposed development which is a strange place to put a hub! Aren't hubs usually in the middle??? Could you explain please!		

Category	Question	Transport	General Development	Facilities	GI/BI/Landscape/Sustainability	Flooding
Activity & Landscape	Do you agree with the approach of the masterplan to seek to build on activities already taking place including an expansion around Fordmore Farm for the principal community hub?	Again, where will all the extra Cullompton bound traffic go?	The local community especially the Kentisbeare community have already specified the need for a buffer zone between Horn Road and Dead Lane; by pushing development of a community hub that far down the Honiton Road, the boundaries further east of the development will encroach on the Kentisbeare parish. Community wishes should be respected once they have been sought.	You're not building on activities already taking place, you're moving the activities from Cullompton into this new development e.g. cricket and rugby. There is no improvement overall. In fact, it will be worse for many people. It's a waste of money to just move things already in Cullompton. Money should he spent on the things we need but don't have or need more of e.g. places to go in bad weather, primary and secondary schools, NHS dentists, WiFi hotspots, homeless shelter etc. Not sure, just labelling it as a community hub doesn't really explain its benefits, a lot of these places are built then sit empty because the public don't use them. It would be good to have open playing fields and premises that charities can use to host events and community projects such as fetes and book fairs.		
		No, I feel that the location for a school (s) is dangerous due to proximity to the particular Honiton to Cullompton Road.	If the street view picture above is an illustration of the type of buildings that will be put there they are totally out of keeping with a rural settlement, the area looks soulless, yet another development of modern buildings with no variety in features. I like the idea of the green spaces within the streets but who is going to maintain them in times of more and more Council spending cuts are residents going to have to pay a maintenance charge to keep the area look at its best?	That depends hugely in what else is going to go in there (as yet this seems very vague?). Will there be some form of shared community centre/facility? Shared with school, possibly health, possibly church? What will make it the centre? How will the Honiton Road be managed there?		
		Fordmore Farm is at the extreme edge of the plan, its access to the A373 is an accident waiting to happen without serious remodelling so no I disagree.	It would seem that the family ownership of 'Fordmore Farm' has already been forward planning with the anticipation of thousands of homes. Infrastructure on Honiton Road is and will struggle with the extension of their business. Not least thinking about the properties nearby that must be feeling the increase in traffic noise/pollution.	There is a farm shop at junction 27 already. Fordmore Farm is on the very edge of the development and on the busy A373 - is new not yet established - wrong place		
			No - I do not agree that the expansion around Fordmore Farm as the principal community hub is a good idea. This is at the eastern fringe of the proposed development and it smacks of two issues: a] this development is being developer led (by key land holders) - not community led and b] if Fordmore is developed then there is already a strong assumption that there will be further future development to the east and eventually Kentisbeare will be "lost" as an independent and thriving village (just look at what Cranbrook has done to its surrounding area)!	Once again, the question is access. The sure what the community hub includes - who will use it. Agree on seeking to build on activities already taking place but don't agree that Fordmore Farm should be a principal community hub as it's not central to the main housing development.		
				Impressed by the 'foresight' of those who bought Fordmore Farm.		
				Fordmore Farm is the wrong place. It is at the corner of the planned development, never to be a hub Initial development should as close to where existing facilities are as possible, that is close to Cullompton. This should also help unify the two areas		
	What are your views on the way the masterplan proposes to deliver green and open spaces across the site and the emphasis on including water a key feature?		Realistically, the landscape already offers immense 'well-being' to existing locals and the masterplan is just a way of trying to describe the already beautiful landscape in a different way! Green spaces exist but the difference will be that there will be 'brick built spaces attached to smaller green zones'.	Green and open are good but adequate facilities must be there too. Water feature is 'nice and fanciful' but irrelevant and costly to maintain	The country park is 'potential'. It probably won't happen so shouldn't be included when considering green and open spaces. As long as houses, buildings etc have enough parking and roads are straight and easy to cross, it will be lovely to visit. You can't walk far in Cullompton without coming across a stream. That's nothing new or special. Where is the renewable energy? Where is the innovation to be a sustainable development?	
			Do you know I think it's all pie in the sky and at the end of the day greed. That would appear to be the way the world sadly is.		This is an excellent aspiration. The Woodland Trust encourages councils to require new developments to have 30% tree cover. Existing trees should be retained wherever possible. Water is an important habitat, but ecology should be looked at holistically, and trees provide important shade to water for invertebrates and fish. Wildflowers and Trees are important for many invertebrates which support other biodiversity and pollination.	
			None of it has any substance so hard to comment.		I think that you would need to make the green space larger to make up for the style of housing planned	
					The green spaces are all at the perimeter of what looks like a huge housing estate. No view on the water. These need to be more than just "the only way to use floodplain and land under pylons" which it feels like they are at the moment? This is at minimal cost to constructors who cannot use this land anyway.	
					No. It would be nice to see the inclusion of some allotments or community gardens or orchards where people could grow their own food to sustain their families rather than relying on imported goods from the supermarket. Better dog walking parks could also be provided as public safe green spaces where dogs can be walked safely. More hedges and mature trees could be saved and included. what protections will there be to ensure these aren't wiped out in future expansions? The more open space the better how ever I do suspect that the green spaces will be areas that can't be built on and the waterways will be the flood prevention areas and rivers unless I am just being cynical.	
					Outdoor space is so important and brings communities together.	
					The planning of green and open spaces is good but the proposal for a country water park in what is already a pretty rural area looks a bit weird. If the emphasis is on flood mitigation then this should be honestly portrayed. Has a demand study been undertaken for the proposed water park? Will this inevitably attract significant visitor numbers and put strain on the minor roads in the proposed country park area? Including water seems sensible, given the amount of it in the area. Likewise green spaces.	
					Really good, blue health (Exeter uni) has been proven	
Mobility, placemaking and other	Do you agree with how the SPD proposes to approach transport and mobility including crossing of the M5, local streets, changes to Honiton Road, public transport and emphasising active travel options?	NO NO NO, if the required changes to the only route across the motorway and junction 28 improvements are left until after all these houses are built, it will never be done!! Improvements to Honiton Road towards Fordmore will be pointless if you still have the total bottleneck approaching junction 28. Any further development is dependent on a new J28 extension, as outlined by the inspector, therefore it is fanciful to be pursuing these options until the precise nature of this junction has been agreed.	It seems foolish to start building without having first sorted some of the major infrastructure questions? The danger is you end up with another Swallow way (complete disaster!) Public transport and active routes may be desired, but are they realistic? Too many houses are built with not enough parking space (to encourage other means of travel), and all it results in is too many cars parked in dangerous places! There needs to be a balance of ideals and realism. Maybe the planners need to be forced to live in the new community! To ensure they don't just produce something great in theory and then just walk away!	Using the Fordmore Farm area as a site of development at the edge of the area will encourage too much development down the Honiton Road, the main community hub should be in the centre of the development not at the edge.		
		Great idea but would be better to improve the existing Cullompton area. We have just lost our bus service to Exeter and now need to walk to the main road to catch it. Not a problem for us but it will be for many people. Why can't the money be split so the existing parts of Cullompton and the new areas can all be like this plan? No doubt the reality will be like the new part of Swallow Way/Kingfisher Reach. Cars parked all over the sides of the road and difficult to cross in places with poor visibility and kerbs strangely high sometimes.	At west junction 27 there would be no need to cross the M5.			
		It is difficult to tell at this stage. The cycling routes need to be planned with public consultation. Bike lanes are often poorly planned and will be essential in encouraging sustainable travel. How long would it take for people to cross the M5 by foot? Is this actually realistic?	I think the planners have fallen into the trap of trying to rejuvenate Cullompton by building a new town next to it. The town council certainly wants this. If the objective is to create more housing and a true garden village, then Cullompton is the wrong location. It's so ironic that JN 27 just up the road is crying out for it.			
		Honiton Road is not a suitable place for development of this kind and would need significant updating before the plan should even be considered. Public transport staffing would also make the public transport plans not viable. There aren't enough public transport staff in more suburban towns and cities let alone in this proposed area.				
		I feel that the road network needs to be improved prior to any construction.				
		No the Junct 28 access has yet to be decided is vague and its the most important access. Many people will commute out of the town, its vital to put provisions in for that. Who will pay for the maintenance of these cycle routes and new roads when Mid Devon Council can't even afford to upkeep the existing ones they have?				
		Expansion of Junction 27, with the train service, petrol station already in situ would make more sense instead of changes to the Honiton Road. References to enhancing public transport and enhancing travel options sounds great, but realistically people enjoy the benefit of privacy, comfort, accessibility of their own vehicles especially in the current climate with covid19.				
		The key issues are and will remain as: 1 the Cullompton Relief road, 2 The J28 amendments to enable good traffic flows at ALL times, 3 the major improvements needed to A377 through the whole proposed development (but equally importantly further to the east and right through to Dulverton as a minimum). If these are NOT delivered East Cullompton simply will not work				
		Agree extra crossings and access to M5 required for both cars and pedestrian travel. Public transport needs to be cost effective, reliable and convenient. If there is good and effective public transport. I don't see the need for car clubs.				

Category	Question	Transport	General Development	Facilities	GI/BI/Landscape/Sustainability	Flooding
Mobility, placemaking and other	Do you agree with how the SPD proposes to approach transport and mobility including crossing of the M5, local streets, changes to Honiton Road, public transport and emphasising active travel options?	Given that the proposal is to turn what is currently a rural, agricultural area into a semi-urban (suburban?) area, the approach to transport seems sensible. A lot will depend on the way J28 is dealt with. It should definitely allow for increased access northwards as well as southwards; the original proposals did not appear to allow for this.				
		The crossing the M5 is as it is now, inadequate. Changes to Honiton Road are vague and stop abruptly at Fordmore Farm, leaving traffic beyond that point in an even worse state. Increased traffic will flow towards Honiton as well, even without the obvious deadlock that will grow at J28 There is only so much you can do to provide access to the M5, widen the Honiton Road, considering the huge amount of extra transport- not only cars but delivery lorries etc. Do you feel it is satisfactory Cullompton as a town will cease to exist. Once accident/ incident on the M5 will totally bring Devon to a standstill.				
	What are your views on the placemaking aspirations and design requirements which will seek to shape the type of place that East Cullompton will become?	No issues with the development, just the roads	Focus on ways to encourage people to visit Cullompton town centre and improve the business aspect of the town to appreciate in the way Honiton is so highly regarded. Use the un-occupied premises within the town for business and residential purposes. I don't understand what 'place making aspirations' means. The design requirements look fine within the boundaries but more consideration needs to be given to the areas that exist outside of the immediate boundary areas.	I think the current masterplan is "skewed" with no heart to the proposed development and this has been replaced by the idea of 3 small community hub areas the most significant of which is on the eastern fringe (Fordmore) and suggestions that sports pitches should be developed on the eastern fringe as well - why are the sports pitches and the community hub not being centred around the proposed site for the school?	I don't really understand this question as you are using strange language choices. It would be great to make this an eco development showcasing the regions commitment to net zero with the majority of houses having solar panels and renewable energy. It would also be good to have space allocated to self builds as this allows people to build houses shaped around their needs not those of big developers.	
		Having the road through the developments with the school is not a safe placing	Placemaking' is a term I had not heard of until reading this document. CNU (Congress for the New Urbanism), whose mission is to champion 'walkable urbanism', defines it as, "the process of creating quality places that people want to live, work, play, and learn in. Great. Some of us felt that we had found that place in the existing rural environment and that it did not need re-making. Given that it apparently is to be re-made the aspirations sound suitably aspirational. Shame you won't listen to existing residents.		Why is it a potential country park? Surely with significant new builds the country park is more than essential not potential. The green space hub towards Cullompton side is not large enough	
		I am not sure that Mobility hubs will be successful in a rural setting where public transport is limited to non-existent.	A lot of this sounds good... but!... Nothing higher that 3 stories please			
	Do you have any other comments regarding the East Cullompton Masterplan SPD?	Train station is ESSENTIAL	The sustainability of people, planet and place beyond the immediate boundaries of the plan needs to be borne in mind; placing such an emphasis on development at the boundaries is going to impede on existing sustained communities. The proposal to include 'a minimum of 10 gypsy sites' seems unviable. Is this the entire gypsy population of Devon? How many homes per site?	Existing facilities should be maintained for existing residents. New facilities should be added to cater for increased number of residents.	Development should be lower carbon, buildings should use renewable energy sources, more thought for enjoying these spaces in bad weather and looking after under privileged people e.g. homeless shelter, halfway house etc.	
		I think the train station is the only sensible option of the whole plan	Should be scrapped. Assess the exact requirement for the needs of local people of East Devon only and build accordingly 200 to 300 at most.	To me it still lacks a centre, and is housing rather than a community.		
			In a time where people can't even afford to heat their own houses is it really the time to be building new unaffordable housing? What guarantees will there be to ensure that the local housing needs are met prior to new people migrating to the town? Many of our friends and family can't make it onto the property ladder as they can't secure mortgages or afford to live so why build houses when they are still forced to live with older family members and can never hope to buy one? Our old house was subject to a covenant that ensured that only people who have lived in Devon for at least three years could purchase it which gave us our first chance to get on the ladder when we were pipped to the post for so many other properties, if there is to be development at least let it benefit local people directly.	What infrastructure will be put in place, before the housing, nurseries, schools, doctors, surgeries, dentists, hospitals. Where will be all the recycling-refuse be deposits, hopefully these will be all taken into consideration before the masses arrive.		
			Building more houses/works units/ schools etc is not progress! It keeps the building industry in business provides short-term job options but does have a long term effect on the existing residents within an area, who have already chosen to live in a place that does not have a large town, city population.			
			As previously. This is a development for future generations and I welcome it.			
			I have a very strong view that NO further development east of the motorway should take place until the Cullompton relief road and J28 are properly sorted out and delivered			
	What are your thoughts on how Section 5.6 of the Masterplan SPD sets out an overall approach to the timing and delivery of the development and its related facilities and infrastructure. Do you agree with the early phases forming around proposed community hubs?	Cannot see how the development will work before the road network is improved	As previously stated this development is dependent upon the road network and upgrade and no development should take place until this has been resolved. The real need in the community is affordable housing for people on low incomes this needs to be a priority over community hubs that won't be used until the development is nearing completion. But you're not listening to the community of Cullompton. It's just all so hypocritical.	No - the community hubs are far to far from the core of the proposed development and are instead at the boundaries.		
		Again... I believe nothing should be done until the motorway junction is sorted and bypass built. Then the plan needs to be clear that this is part of the Garden Village... so it's a proper full plan, NOT two different things	Hopefully it will never be built. Yes, need to make sure that this is not a building site for the next 10 years.	The community hubs - ford more farm shop is currently the right size for the roadside it is situated at. A		
		Infrastructure needs attention first and not the likelihood of some properties being built before the Honiton Road is re-landscaped.	Infrastructure before housing development.	No, no more houses should be built in Cullompton till we start to see some of this new infrastructure - e.g. schools, dentists, doctors first then your community hubs.		
				I do not agree with the early phases forming around the proposed community hubs as I strongly believe that although Fordmore is a good site it is NOT central to the development and it strongly suggests that there will be further development to the east. The focus should be on delivering community assets (sports fields, community buildings, shops, doctors etc.) around the proposed school and more at the heart of the proposed community. I accept that there will be development at some stage but the current SPD is full of poor compromises which strongly suggest that the developers and land holders have the "whip hand" and the community is not being listened to		
				I don't really understand why it would be helpful to start development near to a farm shop on a busy A road?? - I presume this is because it suits the land owner and the developer. - It will certainly not allow the residents to walk to school, doctor or supermarket.. and I am sure it will be many years before anyone will sensibly consider cycling on the A373.		
				Early phases around proposed community hubs would appear to make sense. However, the questions which arise are who would actually run these (until there is a fully-fledged community) and what would they contain?		
Question or query			Why has the East Cullompton Extension been allowed to cross over into the Parish Of Kentisbeare. If the unwanted extension is going to happen it should remain within the Cullompton boundary.		During the recent building of the Persimmon Housing development on Willand Road, I witnessed the sad felling of an ancient oak tree (over 250 years old). Can you give an assurance that trees over 30 years old will be preserved and if not how many trees over 30 years old will be felled to make way for the new development?	
			Is the East of Cullompton development dependent on the town centre relief road? ie if the relief road cannot be built for whatever reason, does this mean the East of Cullompton development (and the Garden Village) cannot be built?			

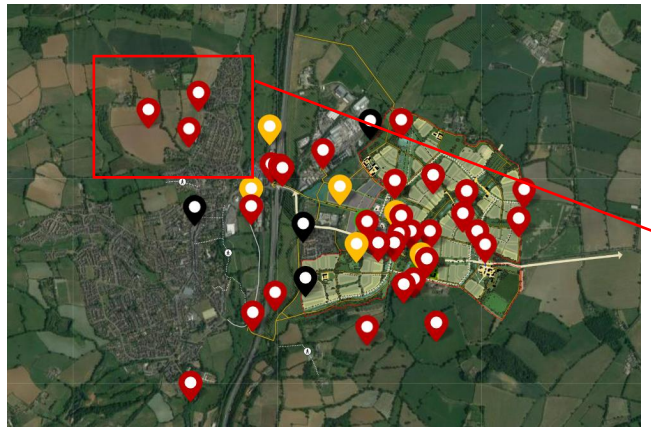
Appendix 1 Interactive map comments



✓ Something I like

✓ Something I want to see improved

✓ An idea





Town centre, fore Street

Where is this?

Town centre, fore Street

Your comment or suggestion:

We have all the houses being built but no mention of a relief road for Cullompton town , it only takes one vehicle to stop in the town and within minutes you have a standstill, this still needs to be address asap

5 people like this

Town Centre but comment here to reinforce other comment

Where is this?

Town Centre but comment here to reinforce other comment

Your comment or suggestion:

Not just one vehicle to stop but one to be parked there all day. Because traffic can pass n the other carriageway there is no obstruction according to the Police

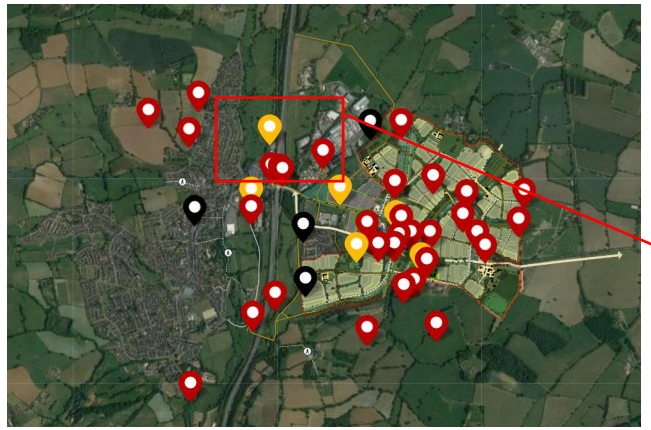
Nobody has liked this yet

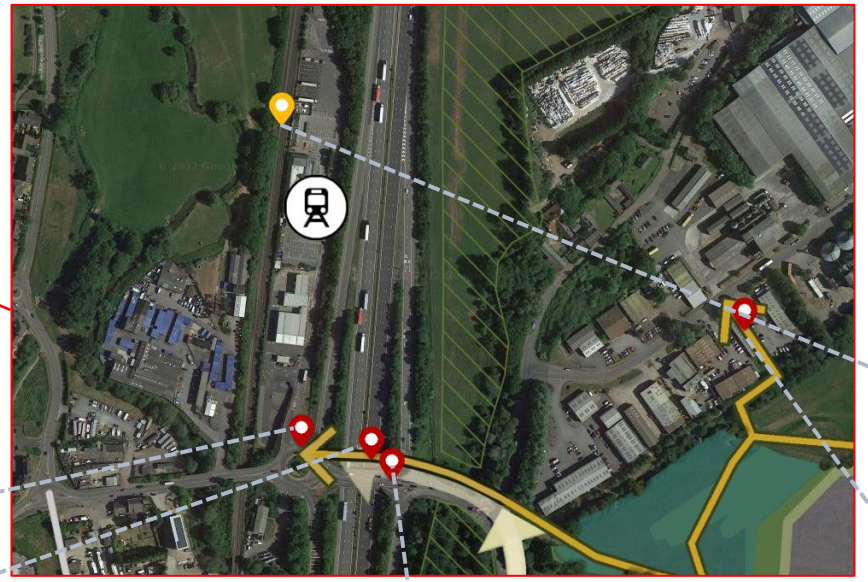
Comment

Your comment or suggestion:

What about allowing these houses. That's more than 2000 houses in Cullompton. No justification for allowing another green field sites to be bricked over

5 people like this





New railway station site

Where is this?

New railway station site

Your comment or suggestion:

I read in the local media yesterday that the new railway stations gone from 2023 to 2025 for being developed. This is far too late. With over 2k in houses in North cully being built and the 5k in the east you'll need the railway ASAP. Cullompton always been a commuter down people are going to be attracted to the M5 corridor not the sense of community. It's vital to have more sustainable transport options for all these people

Nobody has liked this yet

M5 Junction 28

Where is this?

M5 Junction 28

Your comment or suggestion:

The lack of hard commitment to constain development until adequate infrastructure is in place is depressing. No hard commitment that I can see about the Link Road, and the reference to what Network Rail may or may not do re the Station is pitiful. With events to date, its difficult to have confidence that adequate constraints/conditions will be exercised on the developers. I have worked across the UK on significant infrastructure projects over the last 40 years and have seen what effective planning controls can leverage from Developers so why so lack-lustre here?

1 person likes this

J28

Where is this?

J28

Your comment or suggestion:

What will be done to improve this junction? With all the added traffic, from the new houses that will be created, this junction will be unable to cope with rush hour traffic and commuters. Traffic already backs up at peak times everyday at this junction and through to town. Will the road improvements be prioritised and put in place before the bulk of the construction work takes place?

1 person likes this

Kingsmill industrial estate

Where is this?

Kingsmill industrial estate

Your comment or suggestion:

What is this? Is the plan to demolish the existing industrial estate to make a new road?

Nobody has liked this yet

Cullompton Train Station

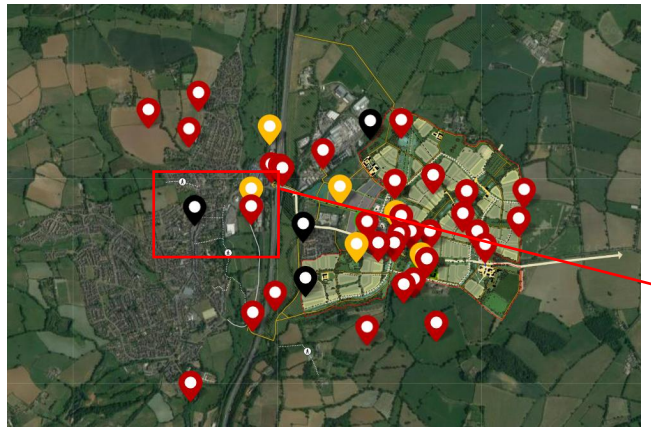
Where is this?

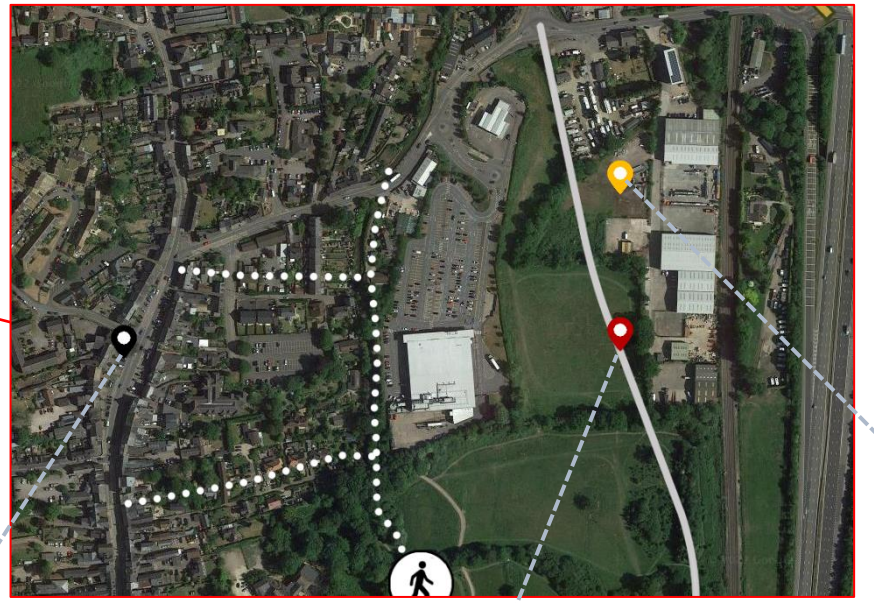
Cullompton Train Station

Your comment or suggestion:

Reopening of Cullompton train station is vital as part of this development. This should be completed before the houses are finished and should also include a cycle network so that people can get safely to the train station on bike. A CHEAP car park should also be included in the train station to encourage people to use the train rather than driving in to Exeter or Taunton.

3 people like this





Higher Bullring Cullompton

Where is this?

Higher Bullring Cullompton

Your comment or suggestion:

All the people that live in East Cullompton or are part of the Garden Village will not be able to easily park when they drive to Cullompton About 10 spaces are being removed from the Higher Bullring to "improve" the area for bigger events for more people to attend. Not Sure where any on of them will park

1 person likes this

Inner Relief Road (via CCA fields)

Where is this?

Inner Relief Road (via CCA fields)

Your comment or suggestion:

No obvious comment linking this long overdue development to the SPD. At Kentisbeare presentation it was stated that the Inner Relief Road (via CCA Fields) had to be completed BEFORE the Garden Village was STARTED. Recommend that it be clearly stated in the SPD that the Inner Relief Road be completed BEFORE the Garden Village is started. Indeed a section for such preconditions be added to the SPD document.

7 people like this

Cullompton Inner Relief road and Cullompton railway station.

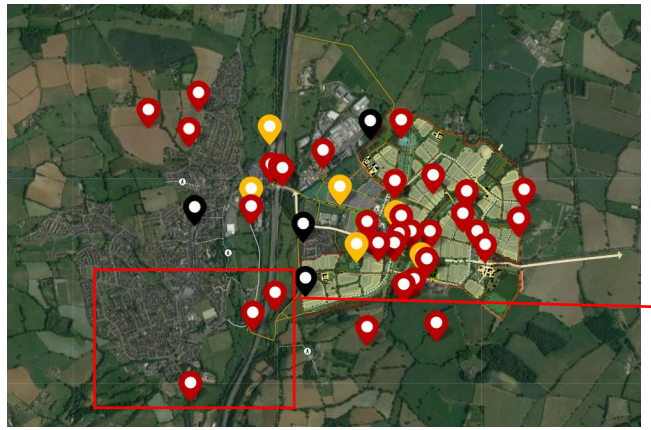
Where is this?

Cullompton Inner Relief road and Cullompton railway station.

Your comment or suggestion:

I feel that the Cullompton inner relief road needs to be completed and the Cullompton railway station re opened (should never have closed in 1960s) before any houses are built in the Cullompton Garden Village. Please please look first at the infrastructure.

3 people like this





B3181 to Exeter

Where is this?

B3181 to Exeter

Your comment or suggestion:

There should be plans for this route to Exeter to be accessible without going through Cullompton town centre. There is already too much traffic in the town centre as it is.

Nobody has liked this yet

Southern end of Inner Relief Road

Where is this?

Southern end of Inner Relief Road

Your comment or suggestion:

No obvious provision for the possibility of linking the southern end of the Inner Relief Road (through CCA fields) to the relief road shown by Jenny Clifford when presenting the Garden Village running to the south of Honiton Road starting just east of the last house in Honiton Road and running close behind the existing houses to S Cullompton

Clearly if both roads are implemented then it would be COST EFFECTIVE to arrange for the intersection to be implemented at the same time. This should be a condition not an afterthought.

3 people like this

Motorway junction

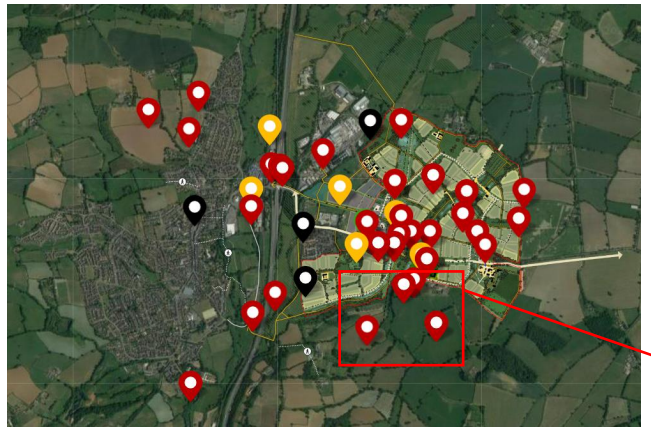
Where is this?

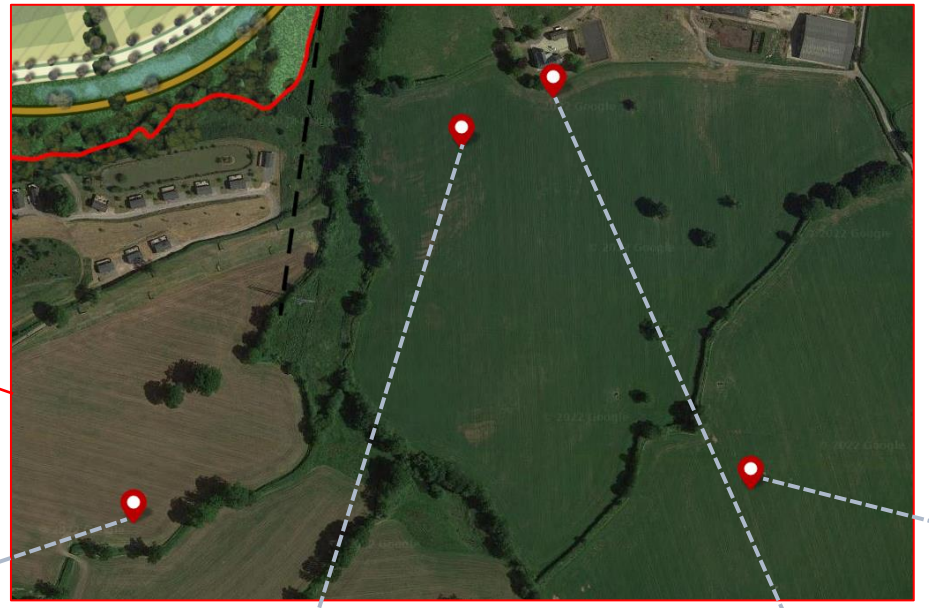
Motorway junction

Your comment or suggestion:

There is no way this motorway junction is going to cope with the amount ov traffic these hosing developments are going to generate. The motorway closed today and as usual the town bottle necked within minutes. The relief roads must be built before any more developments. Traffic congestion is not going to contribute to your eco plan. Also the bridge as a pedestrian is a nightmare to cross due to the volume of traffic and lack of crossings. That needs to be taken into consideration if you are expecting people to walk and use green corridors

Nobody has liked this yet





Comment on the whole plan

Where is this?

Comment on the whole plan

Your comment or suggestion:

Developments as big as this will only be successful long term if the infrastructure is properly designed and executed. Main areas where cost is not happily accepted by the developers are drainage, sewage and flood prevention. It is important that these aspects are properly sized, even oversized, based on the prediction of further expansion. Do not see and real assurance that this will be the case.

1 person likes this

This development is too big, too many house too fast

Where is this?

This development is too big, too many house too fast

Your comment or suggestion:

We've already had 2k odd in houses going in right now into North cullompton. The works at Mill Gardens already cut our Internet off for a month and the college practice is on a generator again because their cables been cut...again. the houses going in at the blood site made that road a nightmare to navigate with them developing entrances on to the main road at the same time as Mill Gardens. It's too much disruption to local residents and wildlife at once. These developments need to be staged over years not months. It's too much and the towns existing community are going to suffer as well as the wildlife. Its awful, kind if regretting moving back here to be honest

Nobody has liked this yet

Aller Barton

Where is this?

Aller Barton

Your comment or suggestion:

How can you build a housing estate right up to a large working dairy farm? Not only will it be rife with people wandering into the farm creating a theft risk but there's also issues from a health and safety perspective. It's completely brainless.

5 people like this

The Whole Plan

Where is this?

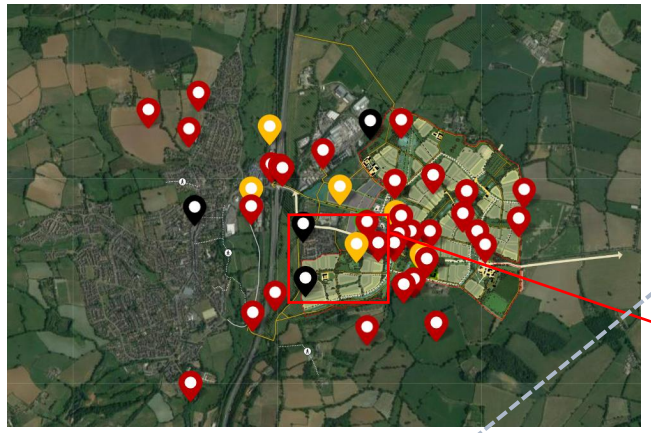
The Whole Plan

Your comment or suggestion:

Having selected the tag to read the comment I am unable to select the "like button". No wonder there are no "likes" for any of the comments - smacks of a stacked deck!!!

Side note: I can select the other buttons in the bottom row (for example Facebook)

1 person likes this





Cummings Nursery Site ✕

Where is this?

Cummings Nursery Site

Your comment or suggestion:

Is this temporarily closed meaning it will reopen again? With so much money being made from development a little extra on getting the right information on the map may help.

Nobody has liked this yet

Comment ✕

Your comment or suggestion:

Isn't this area subject to flooding?

2 people like this

Comment ✕

Your comment or suggestion:

Is access via Greenhouse Gardens to be permitted for delivery of bulding materials and general building work? Access direct to building site from Honiton road (A373) would be preferred option by majority of residents.

Nobody has liked this yet

Honiton Road (A373) ✕

Where is this?

Honiton Road (A373)

Your comment or suggestion:

Buried in the planning is a bit on the need for changes to Honiton Road. No detailed plans are evident but it proposes the use of 20mph speed restrictions. Just wondering how this will be enforced. The road currently has a 30mph limit but many motorists blatantly flout this limit. On the rare occasion we have speed cameras the traffic flows very slow compared to the norm. Are we still having the Garden Village relief road that was planned to run from A373 (between last house and farm entrance) that runs south of the existing houses to south Cullompton? This will reduce load on the road.

Nobody has liked this yet

Honiton Road (A373) ✕

Where is this?

Honiton Road (A373)

Your comment or suggestion:

Clearly the existing plans show that unless the southern relief road discussed when the Garden Village was first mooted (or a northern relief road as suggested at the Kentisbeare presentation) is implemented the traffic on Honiton Road will substantially increase. All of the houses at the eastern end of Honiton Road have individual direct vehicular access onto Honiton Road. For these houses it is already difficult to get onto the road, especially if turning right). Given the failure of other traffic schemes to limit traffic speed in Cullompton (for example High Street, Silver Street in Willand, Tiverton Road) it is questionable that any traffic calming scheme will work. This is especially true if it is remembered that Highways may impose other restrictions on this road which is classed as an A road.

2 people like this

Field just south of 29 Honiton Road (last house) ✕

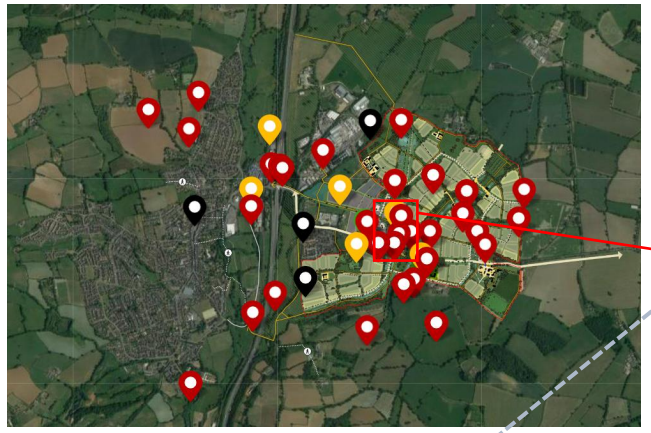
Where is this?

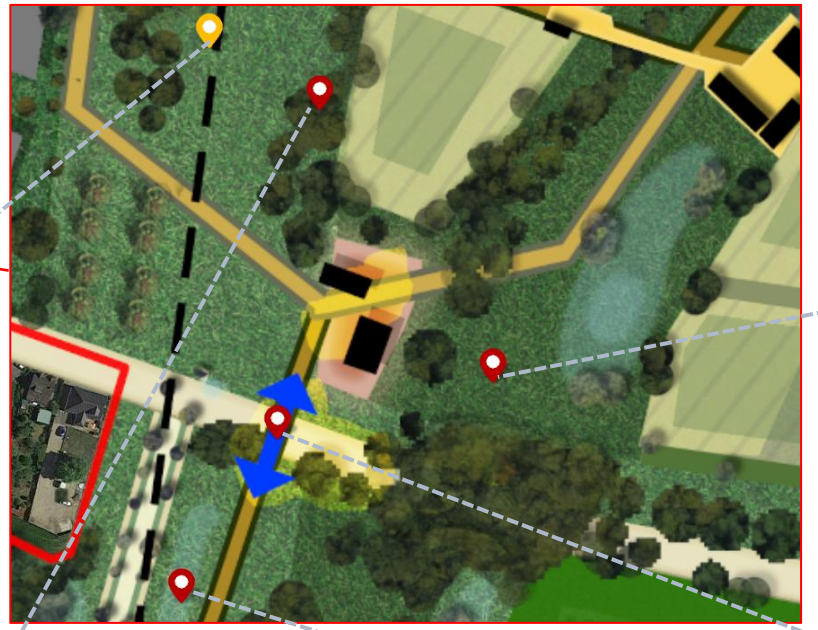
Field just south of 29 Honiton Road (last house)

Your comment or suggestion:

When the Garden Village was first presented by Jenny Clifford there was a relief road linking the A373 starting just east of the last house in Honiton Road and running to the north of the road shown in this presentation. It just clipped the corner of the field behind 25 - 27 Honiton Road. There is no reserved area for this item that was voted on in the previous presentation. If I understand the plan correctly the area is designated for housing. For some not a significant change but quite relevant for those living in Honiton Road.
If this significant modification from the original plan what other "adjustments" have been sneaked into the plan?

Nobody has liked this yet





Any land you don't build on

Where is this?

Any land you don't build on

Your comment or suggestion:

Would be great to allocate some land for allotments that people could use to grow their own fruit and veg locally to reduce the amount of miles our food travels and to become more self sustainable. There are limited existing allotments with lengthy waiting lists and not all of lush have the garden space needed to have a veg patch

Nobody has liked this yet

Relief rd

Where is this?

Relief rd

Your comment or suggestion:

Where's the new relief road
This council should get its priority's right
Before making big plans

4 people like this

Between last house in Honiton Road and Farm entrance

Where is this?

Between last house in Honiton Road and Farm entrance

Your comment or suggestion:

Some time ago it was determined that there would be a relief road that linked Honiton Road (about where the 40mph sign is) around the southern side of the houses and linking up to existing roads in the southern end of town. This would then allow the Garden Village traffic that wanted to go to S Cullompton (for example Aldi or Bradnich) to avoid the M5 bridge. Has this relief road been cancelled thus forcing all traffic along the existing road (A373/Honiton Road) to add to the chaos at the M5 Junction?

Nobody has liked this yet

Blue Double Headed Arrow across Honiton Road

Where is this?

Blue Double Headed Arrow across Honiton Road

Your comment or suggestion:

What is this? Not detailed in the key for the illustration

2 people like this

Zones for nature, ecosystem services, enjoyment, water catchment management etc

Where is this?

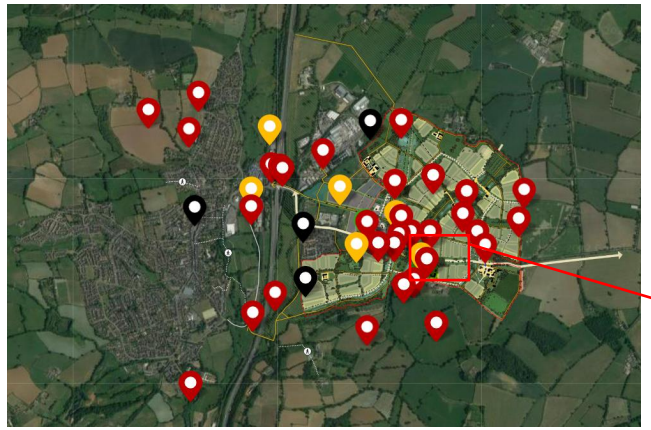
Zones for nature, ecosystem services, enjoyment, water catchment management etc.

Your comment or suggestion:

At first glance there seems to be a few broad green spaces / corridors reserved within the Masterplan map. However, I am curious about why broad corridors are missing / weak in other areas e.g. southern end. Please seek to improve?

I wonder how the layout was informed by ecological evidence and recommendations - plus, on the other hand the (emerging) Nature Recovery Strategy would help inform opportunities for habitat enhancement. Stakeholders need to understand this aspect. Also there is an argument to optimise NOW because the nature gains can't be put back in at a later stage. Bear in mind the baseline landscape was perhaps not ideal - so there are potentially opportunities not identified (some species/groups and habitats would not be found in the surveys).

2 people like this





School - are you going to put in a secondary school?

Where is this?

School - are you going to put in a secondary school?

Your comment or suggestion:

Cullompton secondary school has struggled for years with the space it has left to expand. We barely had room for all our years when I was there over 15 years ago. Could the secondary school be relocated to this site with new facilities that can accommodate the growing student population?

Nobody has liked this yet

A school next to an 'A' road

Where is this?

A school next to an 'A' road

Your comment or suggestion:

It looks like a blundells road problem in the making!

3 people like this

just off Honiton Road close to Primary School site.

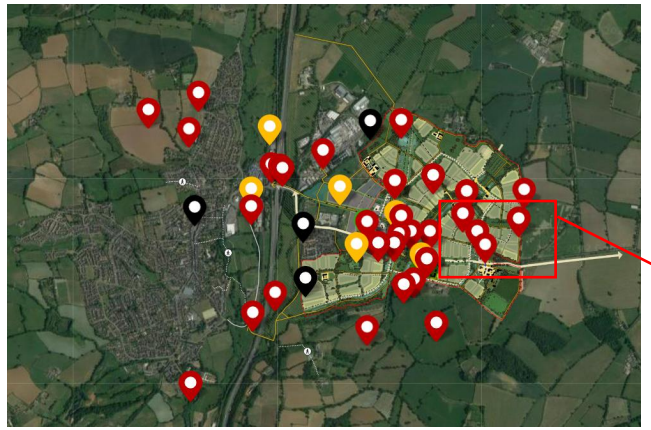
Where is this?

just off Honiton Road close to Primary School site.

Your comment or suggestion:

East Cullompton needs some food shops. Suggest a large supermarket goes in this location, ASda or Morrisons, also East Cullompton needs a new food pub for the very large community. Pub should be built in early stages of construction, so should supermarket. East Cullompton also needs other retail, eg, halfords, screw fix, homebase, shoe fare, currys, superdrug, The Works or WH Smith stationers. If there is no retail in East Cullompton it will just turn into a commuter village and ecveryone will get in their cars and drive to Taunton or Exeter. So the point of the GV beinbg a cycle friendly zone will be lost. Cullompton High street is very small and all the shop units are very small, so big new retail will not detract from High Street but make East Cullompton a destination point.

Nobody has liked this yet





Comment

Your comment or suggestion:

I saw in the FAQs that there is a requirement that at least 28% of the new homes built must be affordable, 28% is a pathetically small proportion of the new homes to be allocated to affordable housing, I hope that this can be increased in the final plan. Also will this affordable housing be shared ownership only? What will the fees be? A lot of the time shared ownership is just as unaffordable due to the extra monthly costs of rent, ground and service charges. Will this affordable housing be ring-fenced for local buyers, with a connection to the area?

1 person likes this

Who's going to pay for these 'green landscaping places' to be maintained?

Where is this?

Who's going to pay for these 'green landscaping places' to be maintained?

Your comment or suggestion:

Will this site be subject to maintenance fees on top of council tax? Personally these kind of schemes but me off buying new builds, its like paying rent for the land your house is built on which for people who already struggle to get on the housing ladder is off putting. Especially when there is no regulation on these charges and they can just be upped whenever the developers like with no cap. We've recently moved back here and it was so hard to find a house free of this entrapment. If the council wants to grant permission for large housing developments they need to pay for their maintenance. Its like buying a pet then expecting the breeder to pay for its lifelong care when you're thr registered owner. They need to take some accountability and foot the bill.

Nobody has liked this yet

A373 crossings for pedestrians

Where is this?

A373 crossings for pedestrians

Your comment or suggestion:

I hope these are bridges to accommodate safe access across the busy A road as the plan is to make every where accessible within 20 walking or cycling minutes.

1 person likes this

The entire perimeter of the proposals

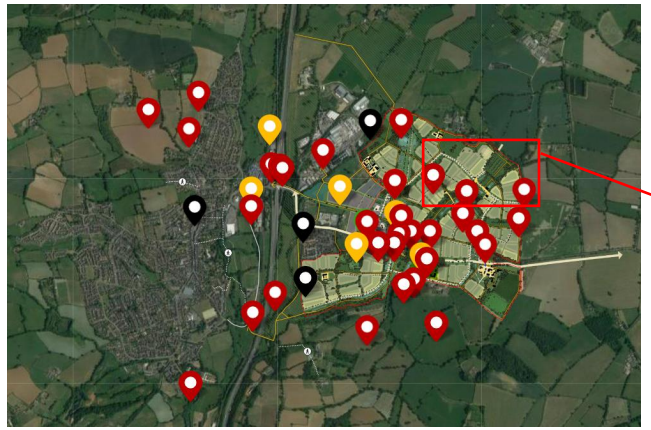
Where is this?

The entire perimeter of the proposals

Your comment or suggestion:

A large part of the perimeter of this masterplan is a perimeter road with housing behind. There is no feathering of the masterplan out into green lungs, or softening down into parks or recreational areas needed by this scale of housing. What this does point to is further and further expansion in the future, bolting on more housing and desecrating farmland and existing habitats. Put a softer, greener edge to this masterplan so that the abruptness of the buildings is contained, don't use perimeter roads and provide evidence of the curtailment to the future expansion further outwards; or be truthful about the intention for this masterplan to be part of an even greater, even worse addition to an already disjointed, problematic unsuccesful small town. Fix the existing town problems/connection, use brownfield land first and provide a measured masterplan solution. This is none of those things.

7 people like this





Comment

Your comment or suggestion:

Will any of this new housing actually be affordable for local people like myself? All of the recent new developments created in and around Cullompton have focused on "luxury" 3,4 and 5 bed homes that are vastly more expensive than the average budget of local people. These new homes seem to be intended to house people from outside the local area, putting more pressure on our already over stretched local services and infrastructure. Please focus on providing the housing that is actually needed by local people who have grown up in this area first.

1 person likes this

Comment

Your comment or suggestion:

Will these new homes have adequate parking? I understand that the plan is that every part of the development will be accessible via walking/cycling, however, people living here will still most likely need a car/vehicle to commute to and from work or to get to Exeter and Taunton etc.

1 person likes this

Eastern boundary

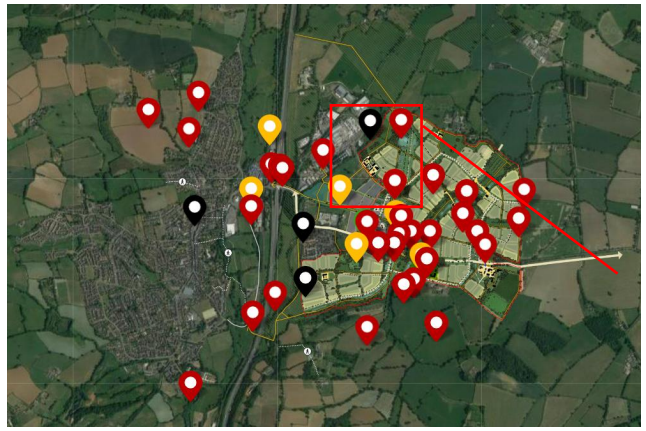
Where is this?

Eastern boundary

Your comment or suggestion:

Not entirely sure this will be the boundary and the pledge not to encroach onto Kentisbeare Parish will be broken intentionally.

2 people like this





Are these reservoirs or admitting you know the area will flood?

Where is this?

Are these reservoirs or admitting you know the area will flood?

Your comment or suggestion:

Have you reached out to southwest water to discuss future water supply for these vast developments? Considering most our local reservoirs are still at 20 % shouldn't we be focusing on reducing the strain on our water resources until a planned action has been implemented?

A new road from Kingsmill Lane behind East Cullompton jopining Honoiton Road with a roundabout in th Aller Barton area.

Where is this?

A new road from Kingsmill Lane behind East Cullompton jopining Honoiton Road with a roundabout in th Aller Barton area.

Your comment or suggestion:

Honiton Road is a very busy A road. Making it a 20mph zone is crazy if there is not an alternative route for large HGVs and other routes. So build a new Road from Kingsmill Lane up behind the back of Est Cullompton connecting to Honiton Road by a roundabout in the area of Aller Barton. This would take all the heavy traffic off the exsting Honiton Road. WHEN THERE IS A NEW ROAD TO TAKE HEAVY TRAFFIC AND ONLY WHEN THAT IS BUILT AND OPEN COULD THE EXSTING HONITON ROAD BECOME A 20MPH ROAD.

Nobody has liked this yet

Yellow line parallel to Honiton Road

Where is this?

Yellow line parallel to Honiton Road

Your comment or suggestion:

This route is still an outline plan. There is plenty of scope for making this route a bespoke alternative to Honiton Road rather than trying to modify Honiton Road. For example ensure that all vehicular access is via service roads and not directly onto the road

1 person likes this

The Culm Garden Village

Where is this?

The Culm Garden Village

Your comment or suggestion:

May be someone could show the original outline of the Culm Garden Village on the same map so that we can see how it fits into what is now being called East Cullompton. I think the whole area for East Cullompton is Much bigger than the Culm Village and people will be confused and think it inly refers to the same area as it is not being shown as different.

Nobody has liked this yet

Fordmore farm shop this is due to be expanded

Where is this?

Fordmore farm shop this is due to be expanded

Your comment or suggestion:

A problem. Even when fully expanded Fordmore farm shop will never be able to provide the range of goods such as a supermarket like Asda or Morrisons. Therefore there should be plans in East Cullompton to bring in a new large supermarket store.

Nobody has liked this yet

Appendix 1 Public consultation email responses

Transport	General Development	Infrastructure	Principle/Questions/Other	Wider Garden Village	Flooding	Env/GI/BI/Landscape	Facilities	Affordable Housing
There should be no further building in Cullompton at all until the relief road is built. This applies to all sites east and west. Cullompton town centre will die completely unless the relief road is built in the next few years	The effect of the plan should not detract from the viability and prosperity of Cullompton Town. It should also not have a detrimental effect on the rural nature of smaller communities nearby.	Increased demand placed on health and social care in the area. Have the GP practices/RDEH and local hospitals/ambulance services agreed that they can absorb the rising numbers of patients?	It is imperative that the village boundary is preserved as well as the appearance and character, although it appears on the map that the development proposal already encroaches into the Parish. The area on Kentisbeare side of the development should remain as agricultural land. Why the need for green spaces when there is prime agricultural land already. Why a garden village when there are tiny or no gardens?	Moving to the wider issue and 'potential areas of consideration' the map shows this passing over the boundary of Kentisbeare Parish, passing Horn Road and reaching Dead Lane. Many representations have been made that the development should be kept out of the Parish of Kentisbeare and that a natural gap be maintained at the Cullompton edge of the development (Buffer Zone) to preserve the nature and character of historic Parish. The scope is looking at putting large school(s) and sports facilities within Kentisbeare. Policy S14 of the local plan specifically protects the Parish (and other similar parishes) from development that does not preserve and where possibly enhance the character, appearance and biodiversity of the countryside…Policies will permit agricultural and other appropriate rural uses.		The use of high-grade agricultural land for housing. Open spaces are integrated into the plan but the rural nature of the east side of Cullompton will be lost forever.	Fordmore Farm is seen as a central hub for the Garden Village providing retail and other services. As mentioned above, the current access onto the A373 is poor. I would also like to question the effect on Cullompton shops and services of this 'out of town' development. Have the retailers in Cullompton been asked their views?	I do understand the pressure to provide more accommodation in the Southwest. BUT this should be affordable and include social housing with a firm commitment from any developers. They should be held accountable for promises that are made.
Extra traffic generated by even a small development feeding into the A373 from the M5 to Honiton. This is a very poor, narrow, and bendy road with the pinch point at the Junction 28 M5. Developing the Fordmore complex will compound the problems. Are there plans to have a filter system (like the entrance to Mole Valley Farmers) to reduce congestion as the complex grows?	East Cullompton and Cullompton being regarded as one: The East proposal significantly overshadows the old town in scale. There is nothing in the plan to make them interdependent. The lack of employment will stimulate out-commuting, increase carbon emissions and by its very existence will damage existing air quality, noise and dust.	I am led to believe from various conversations that the main infrastructure, relief road, motorway junction, new flood defences and station alone will cost in excess of £150 million pounds. That ignores upgrade to the A373 which is already struggling. All these and more are necessary even for the 2,500 houses- that is £60,000 extra cost per dwelling- is there no better way for MDDC to add houses to the district? What is the rational for 5,000 houses- I have not seen any. Is it imply to spread this enormous cost out reducing it to £30,000 per house.	There is a huge mental health crisis in this country. This vast development with cramped and a lack of affordable housing (whatever that actually means) and with houses built before schools and health care it is a disaster in the making. People need space.	Page 51 of the SPD includes the statement that 'surrounding villages remain clearly separate from Cullompton in terms of identity and village setting'. Page 39 states the requirement of a 'green buffer with Kentisbeare' as a key finding from the Stage 1 consultation. However the map on Page 6 contradicts this by referring to it as a 'Potential Area of Consideration' which offers no guarantee that the area will be preserved from development.		Increase Biodiversity? Wildlife exists throughout the chosen area, from rabbits, deer, foxes and badgers to bats, owls, buzzards. That ignores the other fauna and flora that inhabit the fields, ditches and hedgerows that has evolved over centuries in harmony with man. Protect natural resources? You cannot protect what you destroy with concrete, tarmac, houses etc.	Other facilities seem likely to follow according to the East Cullompton Masterplan. As well as depleting Cullompton of leisure activities the relocation will affect the nature of nearby rural communities.	
Junction 28 is a major obstacle to the development east of the motorway. Apparently over 20 options are on the table!! NOTHING must happen until the Junction is improved AND the work completed. With the current economic position in the UK guaranteed funding could be hard to find.	And as for thinking of it as part of Cullompton joined together by the River Culm. It is not joined but divided by it, by the railway line and by the motor way that cuts through it. A footbridge or two, the little lane at Old Hill and the A373 are not going to unite the development with the town so acknowledge that and design accordingly.	Our second concern is infrastructure which has also previously been raised through consultation and discussion. This development should be planned and constructed responsibly. No development on this scale should be carried out without substantial infrastructure being delivered first. It is unthinkable to consider a development of this size without addressing this initially – we have many concerns, but in particular we would like to highlight the A373 as a major concern.	Yet again we are being asked our views on the expansion of Cullompton only for you to ignore them. With the relocation of Cullompton Cricket Club the Council has already broken its promise not to build within the parish of Kentisbeare, and that all community hubs should be within a 20 minute walk. The local community no longer trusts you to serve on our behalf. It has been proved time and time again that the Council has no control over the developers, so we all know that more than 1100 houses will be built before any improvements to Junction 28 are carried out and that a net zero loss of hedgerows within the marked area is a load of bull excrement. NO to 5000 houses on the east side of Cullompton.	We have two main concerns; the first of these being the green buffer zone between Horn Road and Dead Lane, which has repeatedly been referred to through consultation and various discussions including via the Parish Council. We respectfully ask that MDDC respect the wishes and concerns of the local community who have identified this area as an area of particular importance to them that should be protected to ensure that it cannot be developed. It should consist of perhaps tree planting and some walkways only.		We remain concerned at the potential for unavoidable damage to biodiversity and local landscape throughout the lifetime of this project.	If building starts at Fordmore before the M5 J28 is sorted and major improvements to the A373 are carried out, there will be terrible bottlenecks and accidents with unthinkable consequences for Kentisbeare which will be a rat run. With homes what about health care and school provision as these are already over subscribed as it is.	
Cullompton Town Centre currently is very deprived and despite best efforts appears to be in decline. The relocation of the Cricket Club from the town is a big mistake as residents will no longer have ease of access to the ground. They will have to travel by road to get to the new site (Kentisbeare Seconds?) – again the A373 will be affected / pollution increased.	To have a soft edge to the development and 'feather' it into open countryside begin that in Cullompton Parish and preserve the agricultural land that runs from the Parish boundary across Horn Road and Dead Lane to the village itself. There is significant wildlife, including deer, rabbits etc and historic biodiversity here that can blend with the new artificial edge of the proposed development.	Further development East of Cullompton requires underpinning by an infrastructure that is in place before any building commences. The current economic problems do not bode well for firm commitments for funding.	Really concerned to see from the recent Master Plan that you have now almost doubled the original footprint for the village and now included within the "potential area of consideration for wider Garden Village and Country Park" our property and other listed buildings not to mention wildlife areas that are of importance. I do not understand how a Council can railroad rules in terms of listed buildings and what assurances do we have in terms of a new build village being built in areas of importance with wildlife and listed buildings?	I would, whilst writing, like to reiterate strongly the view held by a majority in Kentisbeare and by our Parish Council that we do not wish the Kentisbeare Parish boundary to be breached. All development should remain on the Cullompton side of Horn Road, including the 'relocated' sports club.		Climate Emergency – we are in a time of crisis and unprecedented climate emergency – we are hurtling towards a future that if we do not change our ways will mean devastation for our world – how can we allow this to happen to our children and grandchildren – Preventing this and protecting our planet and all its inhabitants must be the very first consideration taken into account for every decision we make as a district, a community and as individuals – It is irresponsible beyond belief not to, and hopefully will soon be illegal too.	I just want the timing done correctly. Facilities and infrastructure first, development later. Fordmore is not a community hub. It is a private money making venture and should not be considered a focus at that end of the development.	

Transport	General Development	Infrastructure	Principle/Questions/Other	Wider Garden Village	Flooding	Env/GI/BI/Landscape	Facilities	Affordable Housing
Currently there is a dire lack of public transport to and from Cullompton for the existing villages along the A373. Are there guarantees that there will be a frequent and regular bus service to support the development of East Cullompton with the Town and proposed railway station. Is there a firm commitment from the bus companies?		I continue to have major concerns about the viability of any large-scale development to the East of Cullompton. These are mainly related to the infrastructure required to support it.	I have lived happily in Kentisbeare for 30 years and it is so important to myself and other people in Kentisbeare to keep our village as it is and not have such a large number of houses built so close to Kentisbeare. I have taught at the school, helped at youth club, led a Sunday school for many years and now am a church and choir member. I dearly hope you will consider so many reasons for not building such a large development. The traffic going towards Cullompton and the motorway is already very heavy and frustrating. In addition flooding is already a real problem and with climate change and large scale building causing a quicker run off it can only get worse.	The Kentisbeare Parish boundary should be recognised and kept. The plans to build 5000 houses wipes out acres of prime agricultural land. Why? The Terminology 'Garden Village' is a contradiction in terms. I have looked up the definition of the word 'Garden'. A piece of ground adjoining a house in which flowers, grass and shrubs may be grown. A village definition is ' A group of houses and associated buildings, larger than a hamlet and smaller than a town, situated in a rural area'. What Mid Devon is wanting to do, is creating A TOWN.		During the recent building of the Persimmon Housing development on Willand Road, I witnessed the sad felling of an ancient oak tree (over 250 years old). Can you give an assurance that trees over 30 years old will be preserved and if not how many trees over 30 years old will be felled to make way for the new development?	Building a sense of community..., make it compact and village like.... 2500 houses is a significant town- a Cullompton for 10 years ago, Although Cullompton High St has struggled the town still boasts several Churches, 7+pubs, many cafes, restaurants and social clubs, 2 Doctors surgeries, 2 chemists, butchers and several convenience stores, Library, sports clubs, 2 supermarkets, schools and nurseries and more Hairdressers than I can count. To create a community you need all these things. They need to be accessible and designed to generate an identity. The plan does not does this- 2 small commercial hubs is poor thought. It is a town you are planning not a village so design accordingly.	
Do not allow the proposed amount of development until this junction on M5 is sorted or a new junction built with the finance guaranteed for same.			Every year costs rise and projects go unfunded-eg Relief road- and the project keeps gets bigger. It seems to have its own life, continually growing and getting further and further out of reach as costs rise. Surely it is time for a major rethink, especially as the country is virtually bankrupt.	I have to say that we are extremely disappointed that the plans now potentially involve developing across the Kentisbeare village boundary up to Dead lane. The consultant that was present repeated that they will only go up to dead lane if they need to and at the end of the day it's only an idea at this stage. Given that MDDC previously reassured villagers that they would not develop past the village boundary this reassurance appears not to be worth the paper that it is written on. My wife and I oppose these latest plans and MDDC should return to the original promise of any development to the east of Cullompton would be kept outside of Kentisbeare Parish and that the green buffer zone be placed to ensure that the village remains a village and no developments should encroach on it.			Please consider placing the school & sports facilities at the heart of the east Cullompton development so that car travel is minimised outside of the development. I whole heartedly support the vision of making this new community sustainable with services but the school needs to be placed further towards Cullompton in the heart of the housing development, perhaps where local shops are planned	
Expecting people to walk or cycle is just not going to happen. Public transport is already unreliable with strikes as long as the unions have a say and always will be, so people will still rely on cars. To say otherwise is ideological at best. Cullompton railway station is a waste of money. Where will people leave cars in order to use to train?			There are still aspects that require a major degree of further attention, to name just two – flooding and infrastructure.	My main concern with the consultation is the new blurred zone of 'potential area for consideration' which directly crosses the parish of Kentisbeare boundary. I feel most residents of Kentisbeare would agree that this proposal threatens our rural way of life. MDDC have previously assured us of a green buffer zone in line with your rural areas policy. I feel this new proposal would contradict this previous assurance. 'all-through school' buildings with sports facilities, in my mind, do not constitute a green buffer zone, as substantial buildings, which are not agricultural will need to be erected. A large scale school will bring huge amounts of traffic, again contravening the very fabric of rural living. This also is not a development that will enhance the character, appearance or biodiversity of Kentisbeare village which is a contradiction to your rural areas policy. Also, this was not in the original adopted plan which again threatens trust between Kentisbeare residents and MDDC.				
The planning document should have a section that summaries the key conditions one of which is the need to complete the Relief Road first. The document and the presentation at Kentisbeare indicated that it was planned to slow the traffic on Honiton Road (A373). This A road is presumably to a greater or lesser extent subject to the rules from the Highways Authority not just MDDC so the options are very restricted. Currently it is quite common to see speeding cars along the road and not unusual to see overtaking taking place. With such flagrant breaking of the legislation you wonder if simple road markings (alligator marks, red road surface, repeater discs) will be heeded. One comment made was that the road appearance/width suggested that it was a fast road. Only physical restraints like "sleeping policeman" or chicanes are likely to work. Cullompton High Street has 20mph limit where the road is narrow but clearly this limit is often ignored.			It is not acceptable to plan developments that require millions of pounds spent on the increased use of motor vehicles. For this proposal to go ahead MDDC are spending £800K purely on a feasibility study to look at possibilities for increased traffic! Future M5 junctions are looking at costing over £100 million pounds! The Cullompton relief road is now being costed at £30K plus! This is not an acceptable use of vast sums of public money in these times of climate emergency. Our country and indeed our county are at breaking point financially – this is irresponsible beyond belief.	Why has the East Cullompton Extension been allowed to cross over into the Parish of Kentisbeare. If the unwanted extension is going to happen it should remain within the Cullompton boundary.				

Transport	General Development	Infrastructure	Principle/Questions/Other	Wider Garden Village	Flooding	Env/GI/BI/Landscape	Facilities	Affordable Housing
A relief road starting just east of 29 Honiton Road and went close behind the houses to get to what was described as a south facing half junction with M5 to allow residents to easily go to Exeter. This relief road has been erased from the plan and the only place on this revision of the plans where such as road can be placed is significantly to the south of the original route. Please consider reinstating the original routing. Mention was made at Kentisbeare of the possibility of a similar relief road but to the north. A detailed traffic survey needs to be done to show if the traffic from the Garden Village will go to Exeter or Taunton.			It is not acceptable to build on flood plains – this becomes even more important as the climate crisis hits. It is not acceptable to build acres of housing estates on agricultural land that is and will be desperately needed to grow crops and graze animals. It is not acceptable to build houses in areas where residents need to use cars to travel to work. It is not acceptable to allow development to be decided and influenced by the profit aspirations of landowners and developers. It has never been acceptable to ignore the needs of existing residents (of all species) and their communities when planning future development. Yet this plan proposed by Mid Devon District Council is based on doing all of the above. Surely Mid Devon District Council have a duty of care to their residents – surely they have a basic and unavoidable responsibility to 'do no harm'.					
Favouring walking and cycling, how do you propose to do that? There is nothing in the plan to stimulate that. It is a human choice how to travel and regrettably the majority will choose vehicles over effort every time unless you make the development traffic free - which you are clearly not			From the very first suggestion of development East of Cullompton the needs and views of the rural residents in the area have been ignored –Policy S14 in the local plan – under the heading Development – promised to 'preserve and where possible enhance the character, appearance and the biodiversity of the countryside'.. Polices will 'permit agricultural and other appropriate rural uses'. – Kentisbeare is particularly named as one of the areas given this protection and assurance. However at the very first point in the process this was ignored – with permission given to Cullompton Cricket Club to be relocated within the parish of Kentisbeare and continues to be ignored with 'potential areas of consideration' reaching well into the heart of the parish – None of this is in the adopted plan and all of it goes against the overriding view of the residents that a Green Buffer area would exist on the Cullompton side of the Parish boundary and that development should be kept outside of the parish.					
The Railway Station would be good, but if the plan (as I was told at the Kentisbeare pop-up) is for a Metro linking Tiverton, Wellington, Cullompton and Exeter every 2 hours it is not going to contribute much to the carbon footprint of Old Cullompton, evolving Cullompton and East Cullompton.			IF – we cannot stop the initial development East of Cullompton – then we can and should demand that you STOP! Stop at the parish boundary between Cullompton and Kentisbeare – respect our community and leave a buffer zone on the Cullompton side of the boundary. Stop breaking your commitment to preserve our community and environment. START respecting our communities, our environment and our children.					
The thought of 5000 houses being built off the A373 is quite frightening. The A373 as we all know, is a very poor 'A' road which should in fact be a 'B'. So why would anybody want to consider building this amount of houses off it. As and when any form of building might take place on the A373, it is in evitable, there will be traffic lights involved. The A373, especially at peak hours gets very clogged up particularly near the M5 junction. With traffic lights on this road, this traffic problem would get very much worse. To avoid the traffic lights, motorists are going to take to the narrow lanes nearby to get to their destinations. It is highly likely that they will drive faster than they should and accidents are inevitable. The whole concept has not been thought through properly by Mid Devon Planning Dept and members of the Council.			I wish to object in the strongest possible terms to the above application relating to the development land for the Culm Garden Village - In particular, on the land that is within Kentisbeare Parish Boundary. You are already utilising over 700 acres of rural land to build the new Culm Garden Village, so the idea of allowing you to allocate a further 170 acres of "all through school" is both against what was promised and undemocratic. Any proposed schools, for the new Culm Village, should be sited within your originally proposed landbank and not merely "sneaking" it into Kentisbeare Parish.					

Transport	General Development	Infrastructure	Principle/Questions/Other	Wider Garden Village	Flooding	Env/GI/BI/Landscape	Facilities	Affordable Housing
Will you (can you) please give assurance to occupants of Greenhouse Gardens, that the road passing through Greenhouse Gardens will NOT be used for access to the building site? Also, that this road should be barred to the contractors. The road is already insufficient for current needs, let alone perhaps 100 additional cars using the road for parking during the day, and perhaps overnight. Access to the building site should be via the road leading directly to the site from the A373, and building work should not even be started until improvement of the A373/J27 of M5 access is improved. If this request is ignored, not only will the brick road leading into Greenhouse Gardens be destroyed through overuse by heavy delivery vehicles, but the safety of children playing outside their homes will become an unsafe area.								

Appendix 1 Summary of landowner/promoter representations

General	Section 1 Introduction	Section 2 Vision	Section 3 Influences	Section 4 Understanding the Place	Section 5 Masterplan Framework	Section 6 Growing East Cullompton	Appendix 1 Design Code
					Mixed use community hub at Fordmore Farm supported. SPD not clear whether residential can be included in community hubs - green box on page 87 refers to retirement services but not clear if this means retirement living. Requirement to either add residential to community hubs or remove private housing area of Fordmore Farm from the community hub (preferred approach).		
					Landowner intends to develop area of community hub north of Honiton Road for commercial/employment use. SPD does not reflect the consented development at Fordmore Farm (21/00349/FULL) (Class E development, agricultural style warehouse type buildings) or align completely with landowner aspirations. Some of the green space might need to be used for community/retail uses in order to provide sufficient community uses to meet the needs of the allocation. Further discussion on what can be provided requested.		
Good document overall. More optioneering could have been included, especially as masterplan deviates from the first consultation draft. However, SPD sufficiently flexible.	Page 7 – clearer if 'profound change' bullet points retitled as 'profound change, evolving public policy and guidance'.	'Village scale' must cognisant of scale and function and be clear that this is a larger village – functional offering must support growing population.		Section 4.4 Natural capital. Findings from flood modelling can be used when planning the wider concept area – boundaries of built zones have scope to change.	Section 5.1 Page 84 – land outside allocation to east of Fordmore shown on map (and all section 5 plans) – error?	Section 6.1 Useful context but is rightly heavily caveated as being part of a separate statutory process. The text caveats the plans as one way of growing East Cullompton, but the text appears to identify some emerging preferred outcomes.	A core part of the proposed strategic design code is a "site wide framework plan to provide the 'regulating plan' to structure the design code". A site-wide 'regulating' status would be valid if the site had already been subject to a suite of outline applications, and where suites of parameter plans were approved.
	SPD should list background reports that it relies on.	20mph requirement goes beyond a principle and should refer to the aim/objective of safer streets. Key roads may need to be higher speeds – to be proven at application stage that principle is met.		Section 4.6 Heritage Grade I listed Wood Barton should be shown as a significant listed building.	Note that accompanies the identification of 72ha for housing in the SPD cross refers to the assumption that 7ha of this is assumed to be released by the grounding of the 132KV transmission lines. 16ha affected by the 440kv powerlines does not have a note to accompany this figure - could usefully explain that this area enables another 16ha of green infrastructure. Reasonable to advise that some commercial could come forward in this space. Constrained land to the south of the powerlines is not as much as has been assumed, and that there are developable areas beyond the 30m buffer and the hedge line. Calculations show that only 160 homes might be released. Flexibility should be retained (viability).	The future of the Horn Road and Dead Lane area should still be an open consideration. There remain 4 fields south of the consented cricket club that could be developed for housing whilst maintaining a more than adequate visual and perceptual buffer for Kentisbeare. It may be the case, as indicated on the plans, that the fields immediately east of Horn Road have secondary school or sports hub potential. However, it is unreasonable to suggest that the only other future of this land is as 'yet more' country park land, if it is not needed/selected for a secondary school or sports hub.	It appears that there are two objectives; 1. To ensure that the big picture framework masterplanning exercise for the allocation is suitability shaped and that there will be several outline applications presented over a number of years. 2. To ensure that detailed design (post outline application design) for reserved matters approval achieves a minimum consistent quality standard, with the 'bar' at a high level. We think the SPD already achieves the first objective. SPDs can go further and that introduce a strategic level of coding with the SPD (better described as strong/firm guidance).
				Section 4.7 Utilities Moving power lines is at the landowners' expense. Suggest wording: "The land over which the lines pass within the site benefits from 'lift and shift' clause over the route easement. This enables the landowner (at their cost) to alter the path of the power lines if an alternative route is available". Aspiration of the SPD to ground the 132KV lines - these may remain in situ. The SPD might consider an easement for this eventuality (a Plan B), based on examples elsewhere.	Page 82 (not 84) 8ha shown for community hubs – should exclude green space which should be greyed out on land budget plan. GI might increase as a consequence. Fordmore north and south would decrease to 2ha in tune with local plan requirement for local centre. Page 82 shows existing residential land excluded from community hubs, page 84 includes. Unless land explicitly identified as being available it should not be included.	Land promoter supports the achievement of country park land. It is a fundamental objective of an expanded Cullompton, but the spatial coverage of park land seems to keep growing. The Council must consider what quantum is actually justifiable in planning policy. The masterplan may benefit from the need to achieve biodiversity net gain credits as a driver to justify greater levels of country park land.	Land promoter is willing to scope out a potential approach with the Council that can be shown to genuinely add meaningful benefit to the preparation and determination of outline applications (beyond what is already in the SPD). If strategic coding is 'adopted/approved' before applications are approved, we suggest that the word 'regulatory or regulating' is not used for any of the structuring plans within that material. The SPD already moves to drive forward a common approach, but there 'may' be room for some further targeted material to guide outline applications.
				Sections 4.9 & 4.10 Listed buildings – should refer to 'indicative risk of moderate or high harm' – evidence refers only to a risk.	Section 5.2 Outer hubs not needed to meet local plan target for local centre but could help meet other local plan commercial use targets.	An emerging educational strategy is referenced that refers to an all-through school and two other primary school locations, one of which will be paired with a secondary school. At this stage all reasonable options need to be kept on the table.	Placemaking Framework Plan on page 115 of the SPD. This identifies blueways, blueway crossing points, blueway edges, primary streets, the eastern loop, powerline edges and Honiton Road. Perhaps these present the most useful focus for pre-application strategic coding (or further guidance). The mixed-use hubs need no more than what is already in the SPD is needed to shape the approach in these areas before outline approval. Most of Fordmore Farm is already permitted/ built/under construction.

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				Additional zoomed in plans should be presented to show only the allocation area.	Justification for school site not strong – between road and farmyard. Other options could be included – local plan allows for 2 sites.	Elsewhere in the SPD a northern active travel link across the M5 is caveated as being something that can be considered should there be a northern vehicular junction. The same caveat might usefully appear in this section.	SPD provides flexibility for alternative activity zones. SPD could acknowledge any options presented through consultation phase. Given that the SPD is not a fixed plan, scope for strategic 'coding' and outline application work to run in parallel. Pre-application non regulatory coding 'type' guidance could present options so as not to pre-empt final development management decisions.
					Commercial area in right place, strong east-west cycle route good. Less understood is primary road through commercial area (not attractive gateway). Better to skirt western edge of residential land. Not clear how amount of land to meet 32ksqm employment floorspace has been calculated. Light industrial would yield 22,750-26,000 sqm. 'E' uses may increase the density. Useful for background evidence of the SPD to document the assumptions used to justify the size of the commercial area. Local Plan - 1ha of employment land per 500 occupations (just over 5ha). How is this reconciled with the 6.5ha figure in the SPD?	The character areas plan identifies a water meadows character area. The SFRA Q1000 model results identify that EA flood maps are coarse and challengeable. It may be the case that when new flood risk data is applied to masterplanning the garden village, the build zones in the character areas are capable of expansion, drawing them closer together and generating a tighter character area and more housing. There may be other drivers (ecological) but that is another layer of consideration based on choices of where to create BNG credits and where and how much country park land is delivered.	Would like more detail on the overall process that involves any stepped approach to coding. See a role for any such coding to become formalised once land has achieved outline approval. Some adjustment may be needed to reflect approved parameter plans. We see this taking place as part of further, more detailed coding for those areas that have achieved outline approval.
					Section 5.3 Eastern loop better referred to as outer loop (not all east). Text should reference country park is not a local plan requirement. Green box oversteps in referring to BNG being delivered adjacent to boundary and must achieve landscape enhancement. Section 5.4 Welcome apparent recognition, in the green box, that a northern active travel route across the M5 is likely to only be something that is considered where it could be delivered with a new northern junction. Green box on page 109 references junction '30' rather than '28'.		There are some strategic design issues where coding (strategic or otherwise) will not be the tool that delivers a coherent masterplanning approach. The IDP processes have a role to play and will involve strategic engineering strategies that go beyond what coding can achieve. Specific drainage strategies for application areas have to demonstrate that these can operate within a wider system. The location and capacity of early phase junctions are only likely to be deemed suitable if they are capable of enabling the overall superstructure and later phases of the allocation to come forward. Likewise, the garden village will at least be a material consideration when decisions are made.
					The street hierarchy plan on page 108 is indicative but introduces yellow dashed lines to indicate potential secondary streets. Lack of any reference to the use of Saunders Way as part of the vehicular mobility strategy. The road should connect into the main street of East Cullompton and that this should be referenced as an option in the SPD. Active Travel can be provided as part of a strategy that enables vehicular connectivity.		
					SPD is to rely on a modified Honiton Road as the long term primary east-west route. Relying on Honiton Road and a rural community hub as the main centre for 2,500 and up to 5,000 homes is a fundamental big picture urban design strategy. A more northerly diversion of the Honiton Road for east-west movement linked to a more 'street based', urban local centre typology has received little visible exploration. Need to be assured that the junction solutions that are proposed on the key east-west route sufficient to serve more than just the first phases of development.		
					Section 5.5 The requirement for front gardens and bike storage within the green box on page 11 overly prescriptive. Storage can be provided in back gardens and not all houses need a front garden. Reference in the parking section of the green box to street design out of place. Is 'unmistakable' over the top? This should be left to the detailed design stage.		

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					Section 5.6 (page 122) advises that "a strategic design code for the whole allocation site [or strategically important parts of the site] be prepared prior to detailed planning applications. The Planning and Design Process Flow Diagram identifies that detailed design follows the approval of outline applications (OPAs) and that it requires compliance with the SPD, OPA principles design coding. On this basis, the SPD identifies that the 'detailed design' stage is a process that follows the approval of parameter plans at outline stage.		
					A single strategic site could generate several outline applications. An outline approval could generate several reserved matters applications from different applicants. Regulating codes can bridge a gap between approved EIA parameter plans and the detailed design of each sub-area that has achieved outline approval. It is this detailed design which the strategic design code seeks to shape. Such coding would be secured through the use of a planning condition. However, the process diagram places a site-specific strategic coding stage before the approval of outline applications, and their parameter plans. The SPD as a whole is therefore suggestive of a multi-stage coding process. Does the reader rely on the words or the diagram?		
					The Planning and Design Process Diagram presents the achievement of an agreed phasing and delivery plan before planning applications are submitted. Whilst we do not have an issue with such a document, the only valid sign-off process for 'agreement' is determination of the planning application. In circumstances where there is to be a single application, or a suite of applications at the same time, covering the whole allocation, the phasing and delivery strategy would need to be presented in full. However, a phased planning application strategy, across several years, is likely and this will lead to various levels of detail being available/presentable for various parts of the site at different times. It would not be reasonable to refuse an early phase application on the basis that a full IDP has not been presented for later phases. The test should be whether the phase applied for is policy compliant in delivering the infrastructure and place-making that is required, and that it does not prevent or inhibit later phases from doing the same.		
					We envisage an initial strategy that is site-wide but perhaps to various degrees of resolution. Later phases may not be able to completely pin down the approach, and indeed there may be options or implications from the selected solution to Junction 28 of the M5. It may also be the case that agreement on 'who goes first' is not reached between the prospective early phase developers prior to applications being submitted. The commercial reality is that there is limited immediate term junction capacity and there may be a commercial inability for one developer to simply yield that capacity to another.		
					Page 133 refers to a strategic SUDS system. The schedule refers to a high-level drainage strategy having already been developed. It is not known whether spatial aspects of SUDS strategy within the masterplan has any justification behind it, regarding the locations of the basins that are shown, nor to what extent the strategy is based on land control and phasing. The Culm Garden Village website identifies that a strategic flood risk assessment is forthcoming. It will be important to understand the degree of work that has already been undertaken. The schedule refers to the strategic design coding process to explore these matters. This not the right place to consider these matters, and a discrete engineering assessment is needed based on the land use budget of the SPD and emerging planning application processes.		

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	Section 1.1 Table 6 of the Local Plan sets out a housing trajectory for the district. The Local Plan relies upon housing completions starting in 2023/2024 (50 homes). It is late 2022, and this SPD has yet to be finalised/adopted, and no planning permissions have been granted, it is evident that first housing completions will not realistically take place in 2023/24. None of the provisions of the SPD should unnecessarily delay development, are proportionate, and have appropriate regard to land ownerships.	Section 2.1 No reference Policy CU11 (East Cullompton Carbon Reduction and Air Quality). It gives the appearance that it is creating new policy by way of an SPD. Should be reference to Policy CU11 in this section.	Section 3.2 Seems to suggest that a 'Carbon Reduction and Low Emission Strategy' for the whole allocation area is required. Not identified in the 'Planning and Design Process Diagram' . Unclear as to the intention / expectations in this regard. Is a site-wide strategy produced by the Council proposed or are individual strategies to be produced by developers to demonstrate compliance with Policy CU11? The former will unnecessarily delay development whereby the latter will ensure compliance with Policy CU11 whilst allowing development to come forward (consistent with the broad phasing identified later in the SPD). The SPD would benefit from clarity in this regard.	Section 4.9 The 'Combined Constraints Plan' on page 76 combines the constraints identified in the SPD. It shows lack of constraints in the south-western part of the allocation. This supports the indication in the SPD that this area should form part of a first phase of development. It also shows that this area can be delivered as a more discrete part of the wider allocation, without impacting upon or being complicated by some of the issues that affect some other parts of the wider allocation.	Section 5.1 Given the numerous land ownerships within the masterplan area, and the fact that development will come forward in phases through separate planning applications, support the requirement for a 'Compliance Statement'. It is important to have regard to the type of application being submitted (outline or detailed), and the scale of development proposed.		
	Section 1.2 Support the approach, which seeks to ensure that the masterplan concept is designed to work with the variety of potential solutions currently being considered. Support the clarity provided to the effect that any references within the SPD to the wider potential 'Culm Garden Village' are commentary only.		Section 3.5 Whilst there is a key role for the Local Plan and this SPD in shaping the development, the need for developers to rely upon one another should be reduced as far as is possible, consistent with delivering high quality development. Such an approach will avoid unnecessary commercial complications that could delay / prevent delivery.	Section 4.10 The 'Opportunities Plan' on page 78 includes a variety of numbered elements which are explained in the text of page 79. However, it also includes various graphical symbols which do not seem to be explained. Suggest a key is added such that the opportunities it identifies can be properly understood.	Section 5.2 We support the 'East Cullompton Activity Framework' plan on page 84. The key for this plan does not identify what is meant specifically by the thicker and thinner black lines. They seem to represent main and potential secondary roads but this is not clear – amending the key would be helpful.		
	Section 1.3 In the 'Planning and Design Process Flow Diagram', both the 'Delivery and Phasing Plan' and the 'Strategic Design Code' are shown as being produced prior to any outline planning applications. We question the extent to which a site-wide Strategic Design Code needs to be in place prior to any outline permissions within the area being granted – given that the majority of any 'coding' will presumably relate to matters more appropriately addressed at reserved matters stage (materials etc…). There are also likely to be parts of the masterplan concept that are more strategic and more sensitive (and therefore more in need of design-coding) whilst other parts will be less so. The delivery of housing in these less sensitive / less strategic parts of the allocation area should not be delayed unnecessarily by the need for a design code for the whole of the allocation area.				School site page 89 Support the provision of a new school consistent with Policy CU10 of the adopted Local Plan. We note the reference (from Policy CU12 of the Local Plan) to seeking to ensure that serviced land for this school is provided prior to the first occupation. A literal application of Policy CU12 would serve only to unnecessarily complicate and delay development. Whilst the land for the school forms part of the identified Phases 1 and 2 of development on the plan at page 124 of the SPD, it is in a different ownership to other elements of Phases 1 and 2. It would not be appropriate, necessary or desirable to delay residential development elsewhere within Phases 1 and 2 pending a transfer of land for a school from another landowner to the Council, and could also create the potential for commercial issues between landowners which may serve only to undermine the early delivery of development. Accordingly, whilst this SPD cannot change adopted Local Plan policy, we consider that the SPD should not repeat this requirement from the Local Plan, and that the application of Policy CU12 in due course should be done carefully as development proposals emerge within the wider allocation area.		

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	An outline application for a limited number of new homes within the area identified as Phase 1 of the East Cullompton development may not require the full 'Phasing and Delivery Plan' to be in place prior to an outline permission being granted. The SPD should clarify that the flow chart identifies the general theoretical / strategic approach, but that the way in which development is delivered will also need to have regard to practical issues and ensure that any strategic matters such as a design code / delivery plan) are proportionate.				Powerlines (p93) We do not object to the reference in the SPD to exploring the potential to underground the overhead pylons. However, such works would also be extremely costly. A final decision in this regard should be made at a later stage when there is greater clarity on the costs and benefits.		
					Community Greens (p102) There is no key for the plan. We assume that the potential Greens are denoted by the dark green shading on the plan but this is not clear (the same applies for the lighter green shading which we assume is showing general green infrastructure). The size of these greens should be considered as part of future planning applications to ensure that they fulfil their identified functions but do not utilise land that may be more efficiently put to other uses.		
					Biodiversity Net Gain (p105) Agree with the requirement for developers to demonstrate a net gain in biodiversity. We note that the SPD identifies that the masterplan framework as a whole may raise questions as to its ability to deliver a biodiversity net gain within its boundaries. It should be noted that some areas of the allocation offer significant potential to secure biodiversity net gain. We are unclear why the SPD requires that such offsite solutions should be 'adjacent to the East Cullompton allocation boundary'. We are not aware that this is a requirement of any national or local level policy approach and we do not consider that it is necessary or appropriate to be so prescriptive.		
					Section 5.4 – Mobility Mobility hubs are not defined on this plan or in this part of the SPD (they are addressed later in the document). Beneficial to clarify and cross-reference as appropriate.		
					Street Hierarchy (p110) The plan does not include a key and accordingly, it is not clear what is meant by the various lines and arrows. A new road is proposed to run south (and then west) from Honiton Road, which would provide access to the proposed land parcels south of Honiton Road and south of the Greenhouse Gardens development. We do not object to this in principle but important to recognise that the masterplan is strategic in nature and that the Council does not intend this to define the precise location and extent of elements of the plan, which will instead be defined through planning outline and detailed applications. For example, it may be that more detailed work demonstrates that this access from Honiton Road is or can be taken from a different location.		
					Question the rationale (from both an urban design and cost perspective) of having this proposed access road running adjacent to the southern edge of these development parcels. Advantageous for this to be a development road. As this is effectively a dead end for vehicles, this change would not undermine any other aspect of the wider masterplan concept in terms of street hierarchy. Furthermore, it will allow the creation of a street running through these development parcels, whilst also reduce the relative infrastructure costs.		

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					Section 5.6 Matters of delivery and phasing are the most crucial considerations. The masterplan must have regard not just to design aspirations but also the reality on the ground given the aspirations / requirements of the various landowners / developers within the masterplan area. Failure to do so will mean that the masterplan is ultimately not delivered (or not delivered in a timely way).		
					The introductory paragraph should stress that phasing and delivery considerations will only seek to bind the various landowners together to the extent that it is necessary do so in order to deliver infrastructure in a fair and timely way. The aspiration should be to ensure the delivery of development on a landowner by landowner basis, with communal elements requiring joint working / funding reduced to a minimum. Clearly, some elements need to be considered holistically but an approach to keep this to a minimum will simplify the development process.		
					We agree that the proposed Phasing and Delivery Plan is going to be a crucial document and should have regard to the need to achieve the build out rates needed to deliver the site allocation in the Local Plan.		
					Within the draft Masterplan document the site identified as a Commercial Area includes an allowance for a Care Home, a Retirement Complex, appropriately scaled retail uses, offices, a Hotel and leisure uses. An overlapping of these uses would provide for circa 32,000 sqm of development floorspace. Such flexibility in respect of land uses is welcomed. Support for the details set out within the draft Masterplan document as they relate to this land ownership. Consideration be given to including an element of residential use within this area which could include an element of live / work units together with specific reference to stand alone employment space.		
						Support the aspirations for a Country Park having the potential to provide an 'outstanding asset' for both existing and future residents. However, it will require collaborative working with developers to ensure its delivery. Ensuring that it is delivered at an early stage so that it is available as occupations progress and the population of the town increases, is an imperative.	
						The realities of delivery and the release of the necessary land necessitate a quantum of accompanying development. An allocation of circa 250 units on part of the land area that is identified as a potential Country Park is likely to be a minimum prerequisite for the delivery. Growen Estates object to the Masterplan Framework in its current iteration since it since fails to reflect the prerequisites for delivery of a substantial community asset. They would be pleased to work with the Council to agree an alternative approach incorporating a quantum of housing that will enable the delivery of the Country Park at an early stage.	

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The SPD is overall welcomed as a critical component of delivering the allocation, providing clarity for developers and local communities. Landowner wishes to see the SPD advanced and set out a range of suggestions within these representations as to how the role of the SPD can be further clarified and strengthened to deliver the local plan objectives for the allocation, with a focus on facilitating the phased delivery of the allocation.	The work on low/zero carbon is identified as in parallel, and therefore presents uncertainty on application and given the change in standard tying back to the policy requirements of CU5. Clarification has been sought from the Council on interpretation of this. Request for all background evidence and inputs to be fully listed and published to aid in interpretation of the SPD.	While supported in principle the SPD would benefit from tempering this with an acknowledgment of the site's location adjacent to the M5 and proposals for a new railway station that would inherently be reliant on out-commuting to be viable. It is noted that the fundamentals of junction capacity have been a consideration from inception. The framing of the motorway, railway and river as 'perceived' as an alternative interpretation to clear 'real' barriers is unhelpful.	The balance of priorities within the SPD should reflect that bus provision is a policy requirement.	Within the earlier phases of development this will inherently be linked with the need to address the motorway junction capacity at J28 of the M5 arising from the allocation, with this currently forming the most direct route to Cullompton from the allocation for active travel users. It is therefore likely unfeasible to segregate active travel connectivity from motorway capacity discussions. Requiring delivery of active travel as a 'priority' with respect to phasing release of development across the allocation will imperil early release of phases of the allocation.	The clarity on the flexibility of the masterplan as an image is welcomed. It is agreed that the nature of such allocations/developments require evolution in response to detailed matters that only arise through the course of applications. It is noted that this approach has very limited reproduction elsewhere, which in the context of the wider ambitions being set may lead to competing interpretations/expectations from those involved with the allocation process. The text however goes on to then use this flexibility to seemingly justify the more regulatory role of the 'green box' text as 'requirements'. As set out above these would benefit from either greater flexibility or a two tier structure for broader 'objectives/aims' and more tightly defined 'requirements'.	While this does not have allocated status within the Local Plan, it does have endorsement through the made Neighbourhood Plan. The natural evolution of the SPD to the wider Culm Garden Village extent is therefore a critical component of future proofing the SPD. We would re-emphasise the stated position earlier with regard to sports provision, with the Culm Garden Village expanded masterplan furthering the distribution of such facilities. The extension of this and transition into wider green infrastructure, while logical amongst the established woodland to the south east of the Danescroft parcel, at the extent shown leads to not well resolved development parcels, which will be at risk of isolation with limited ability to connect into the wider development.	It is considered that the approach to the SWDC is not well realised, lacking in clarity and purpose, likely duplicating other actions necessary in realising the delivery of the allocation. There is no policy obligation under the adopted policies for such a document. The request would on its surface not be defensible as part of any planning application process. It is not clear when such a document would be required, with the suggestion that this be before an outline application is made but with no means to refuse to validate and assess an application without such a document, and the flow diagram allowing multiple interpretations. There is no clarity on how such a collaborative document should be prepared. There is no clarity on how such a document would be engaged with by key contributors.
Highlights the need for the SPD to focus on facilitating delivery to ensure one of the core objectives of the local plan to deliver on future housing ambitions is met.	Details for railway station and motorway junction solutions to be resolved, with modelling work to be completed that will clarify road capacity. This presents uncertainty in delivery of the SPD, resulting in a need for flexibility in approaches.	It is considered that the flow from vision through to requirements is not fully realised. The structure would also benefit from either a softening of the framing of the green boxes as 'requirements' to 'objectives/aims' or a two-tier format, setting out broader 'objectives/aims' from the more detailed 'requirements'. It is apparent that much of these 'requirements' will be subject to detailed design work taking account of competing inputs, including from statutory consultees, and it remains unclear how much input these consultees have had at this stage. This is evidenced for example in the commentary above on the desire for fords. The SPD also makes clear in section 3.7 that much work is being run in parallel making some of the 'requirements' lacking in certainty at this stage and emphasising the need for flexibility. The SPD would benefit from a clear mechanism/format to reflect the uncertainties and flexibility needed to respond to such areas.	No objection is held to the principle of encouraging accessibility and the benefits of 20-minutes places are well recognised. The 20-Minute Place is supported as an objective. The SPD would benefit from clearly framing the interpretation of the 20-Minute Place. The provision of services within the East Cullompton allocation is to be defined by the infrastructure requirements set by policy and statutory consultees. This will likely limit the ability for true self-containment within the 20-Minute Place approach.		Interaction between Commercial Areas and Mixed use Community hub is not clear with reference that these have overlapping uses. It is unclear whether these built forms include curtilage areas, such as parking. The total land budget from these inputs does not meet 160ha.	It is considered that the distribution of development would benefit from further housing close by the principle mixed-use community hub of the allocation that will serve to reinforce the demand and use of these facilities encouraging self-containment through the 20-Minute Place principles.	The interchanging of the framing as a SWDC or Strategic Design Code, with a specific direction to either the whole site or strategically important parts is confused. With regards to the suggested content it is considered that much of this will be addressed in other areas of work associated with applications or the allocation. For example, the SPD presents key principles and a site wide masterplan framework, which the Appendix 1 content effectively reproduces. This inherently infers that the SWDC acts as either an opportunity to evolve the masterplan SPD, in which case this should be made clear, or runs the risk of competing with it. While the SWDC motive may be to encourage settlement of some of these cross-cutting elements to speed application processing, the previous commentary on procedural risks associated with this delaying initial phased release of the allocation and in so doing delaying progression of the allocation as a whole are real and likely risks. Overall, it is felt that the envisaged content should be directed either to that within the SPD, as part of outline application submissions, or to Area Design Codes linked to individual parcels that could evolve from outline permissions that could be secured prior to reserved matters as is common on strategic allocations.
It is considered that the SPD should not set out defined phasing areas given the relative uncertainties surrounding the parallel work and this should be informed by the SPD text and advanced through the PDP process. The PDP should not be predicated on a comprehensive approach before a single outline application to enable phased delivery. The representations set out an alternative approach that addresses the PDP as a process with multiple stages that will evolve to reflect the phased released of the allocation under the parallel work.	The text should acknowledge the close proximity of job opportunities, highway improvements and railway station proposals along with the proposed growth as a response to the existing degree of out-commuting and lack of selfcontainment, as set out in discussion of the 20-Minute Place principles.		The Carbon Neutral 2030 ambitions are recognised. This principle is expanded upon in section 3.2 of the SPD. The policy obligation within the adopted plan Policy CU11 is to "minimise the overall carbon footprint of the development". A carbon neutral scheme is therefore not required by policy and it recognised that the framing is of a requirement to 'minimise carbon' with the processes set out supporting application of this policy requirement.		It is noted that the indicative sketch of community uses omits the consented employment units at Newland Farm. The open space/community hub uses are unclear with play, orchard and woodland/ecology/blue infrastructure areas south east of Newland Farm all within the defined mixed use community hub and arguably duplicating the role of the 'community green' further south-east within the masterplan. While the flexible nature of the masterplan is acknowledged and welcomed the deviation between such imagery and that proposed raises confusion on expectations/ambitions for this space. The image also indicates the segregation of the defined Community Green from the mixed use hub than its integration. Refer to previous commentary on this matter about existing nature of the Newlands Farm complex/consented expansion. Inclusive mobility needs require disabled parking close to facilities. Presume this is allowed for within framing as 'main parking'.		

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Beyond the phasing/delivery implications, the policy rationale and duplication with other considerations/ processes are such that the approach to the Site Wide Design Code is challenged. Landowner encourages that the SPD and outline applications can facilitate much of the deliverable ambitions set out for this document, with design codes secured under outline planning permissions.					Further opportunities for incorporating mixed use will be explored. Framing as 'opportunities' reinforces proposal for two tier structure to green box text. These 'opportunities' will be framed by competing interests, such as vegetation retention of hedgerow and woodland adjacent to Honiton Road. Preference for "co-located or close by" to provide flexibility on delivery for retirement, healthcare and aged services cluster.		
					Feedback from the County Education Authority presents no objection to a location north of, but close to, Honiton Road. A preferable alternative for the school location is suggested based on fulfilling the SPD objectives.		
					Flexibility should be afforded to the suggestion of residential densities towards the edges of the community relating to the future Culm Garden Village expansion of the allocation.		
					Inclusion of Blueways within amenity green space would benefit from clarifying if any constraints on this (e.g. flood risk zone) and where overlap with other areas of strategic green infrastructure apply. The sketch of the community hub shows orchards rather than allotments. This infers that allotments could extent to other edible landscapes and clarity is sought in this regard. The scope and format of 'teenage facilities' is not defined. Does this include MUGA, skate park, etc.		
					The role of the Eastern Loop route to the masterplan vision appears poorly realised. This would act principally as a leisure route providing indirect routes in place of active travel desire lines. The interaction with the countryside would be inherently limited by the predominant definition of the allocation edged by hedgerow boundaries. The Danescroft interest extends just short of the eastern extent of the allocation north of Honition Road, and excludes the land immediately south of Honiton Road. This will likely imperil delivery with early phases connecting across the northern and southern Danescroft parcel. Future connectivity can be catered for in this circumstance.		
					Biodiversity Net Gain compliance is prescribed by the Environment Act 2021 and subsequent regulations. Compliance with this cannot be prescribed to adjacent land only as a result.		
					Para 3.102 of the Local Plan states "The Council recognises that the high infrastructure costs of this site will not solely be funded by the development. As has been the case on other strategic sized sites, the Council will work with its partners and the development industry to secure external funding to ensure the delivery of the necessary infrastructure." This text should be reflected in the SPD to prevent false expectations of full funding.		
					The approach to the assessment of traffic impact as described in the SPD is subject to agreement from National Highways and the Highway Authority. Unclear whether this text has been agreed to by these key consultees to ensure a safe and functional highway network.		
					Reference to central, southern and northern active travel crossing of the M5, but with only 2 shown and 'potential' future crossing to north part of CGV. Scope of provision of typical active travel sections will be subject to detailed considerations of LTN1/20 and capacity for delivery within adopted highway width and balancing vegetation retention to areas such as Honiton Road. Design of primary street network for first phase as shown in the SPD to M5 improvements is not applicable, given this presumes retained use of Honiton Road.		

General	Section 1 Introduction	Section 2 Vision	Section 3 Influences	Section 4 Understanding the Place	Section 5 Masterplan Framework	Section 6 Growing East Cullompton	Appendix 1 Design Code
					Annotation shows 'mobility hub' within a building. This does not appear to correlate with wider description of facilities.		
					The approach to build on the Newland Farm complex is endorsed. From project inception this was identified as a logical approach given its range of uses, future consented expansion plans that would further diversify the complex's offer and its location centrally within what would be the logical early phase(s) of the allocation. Comments set out an alternative approach to the community green location as well as concerns about the response to distribute sports provision across the allocation and the focus on fords as part of the emphasis on water.		
					It is highly likely that the combination of the Town Centre Relief Road, Junction 28 improvements, active travel connections and new railway station will require external funding sources in addition to development contributions to ensure a viable development across the allocation, be this with regard to forward funding for phased release or in totality. These are fundamental components to delivery of the scheme and it is not apparent that considerations has been given to how these may come forward with development to ensure a deliverable allocation.		
					Linked to this, and as has been set out earlier, is considered that flexibility in timing of delivery of active travel connections across the M5 corridor is crucial given the opportunity for limited release before M5 junction improvements (with the capacity yet to be defined) combined with the need for these junction improvements to facilitate active travel connection across the M5. While clearly the current arrangement is not ideal for pedestrian and cyclists, given the distances involved opportunities for further emphasis on public transport connectivity, particularly for earlier phases, should be facilitated to enable phased release.		
					There are a number of relevant considerations related to setting out a co-ordinated design scheme is sought for Honiton Road to secure this as a 'street'/'place' and acknowledgement of the variety of inputs is encouraged and proactive working with developers to secure an optimal outcome to these various interests. The focus on a range of car parking solutions is welcomed, but the emphasis should place less emphasis on 'strategic provision' for parking as a preferred strategy to enable flexibility in approach to be informed by the Highway Authority as applications progress and the delivery of electric vehicle charging.		
					While Landowner is broadly supportive of the need for such a document, it is considered that a fully realised Site Wide PDP before any outline applications be advanced is unrealistic and would serve to counter one of its ambitions to "Achieve the build-out rates needed to deliver the site allocation in the Local Plan". Danescroft therefore envisage the PDP as a focused process that will set out a multi-stage approach. This reflects the intention for the PDP to be annually reviewed and have stewardship. This would be based on identifying all infrastructure requirements across the allocation as a whole, before elaborating on these for the initial phases limited by the M5 junction capacity.		
					The M5 junction capacity and associated works to overcome this constraint are likely to prove a key milestone in the delivery of the allocation. So much so that a PDP that determines detailed wider infrastructure delivery before any outline application can be advanced would inherently delay all development within the allocation until this core and complex consideration is essentially fully resolved. It is considered that a detailed phasing proposition at this stage is pre-determinative of key inputs and considerations and is best directed through the surrounding text and the PDP process.		

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Appendix 1 Table of interactive map consultation responses

Transport	General Development	Questions/Other	Flooding	GI/BI/Landscape	Facilities	Affordable Housing
We have all the houses being built but no mention of a relief road for Cullompton town , it only takes one vehicle to stop in the town and within minutes you have a standstill, this still needs to be addressed asap	What about allowing these houses. That's more than 2000 houses in Cullompton. No justification for allowing another green field site to be bricked over	Having selected the tag to read the comment I am unable to select the "like button". No wonder there are no "likes" for any of the comments - smacks of a stacked deck!!! Side note: I can select the other buttons in the bottom row (for example Facebook)	Isn't this area subject to flooding?	Would be great to allocate some land for allotments that people could use to grow their own fruit and veg locally to reduce the amount of miles our food travels and to become more self sustainable. There are limited existing allotments with lengthy waiting lists and not all of lush have the garden space needed to have a veg patch	Cullompton secondary school has struggled for years with the space it has left to expand. We barely had room for all our years when I was there over 15 years ago. Could the secondary school be relocated to this site with new facilities that can accommodate the growing student population?	I saw in the FAQs that there is a requirement that at least 28% of the new homes built must be affordable, 28% is a pathetically small proportion of the new homes to be allocated to affordable housing, I hope that this can be increased in the final plan. Also will this affordable housing be shared ownership only? What will the fees be? A lot of the time shared ownership is just as unaffordable due to the extra monthly costs of rent, ground and service charges. Will this affordable housing be ring-fenced for local buyers, with a connection to the area?
5 LIKES	5 LIKES	1 LIKE	2 LIKES	0 LIKES	0 LIKES	1 LIKE
Not just one vehicle to stop but one to be parked there all day. Because traffic can pass in the other carriageway there is no obstruction according to the Police	Developments as big as this will only be successful long term if the infrastructure is properly designed and executed. Main areas where cost is not happily accepted by the developers are drainage, sewage and flood prevention. It is important that these aspects are properly sized, even oversized, based on the prediction of further expansion. Do not see and real assurance that this will be the case.	What is this? Is the plan to demolish the existing industrial estate to make a new road?	Are these reservoirs or admitting you know the area will flood? Have you reached out to southwest water to discuss future water supply for these vast developments? Considering most our local reservoirs are still at 20% shouldn't we be focusing on reducing the strain on our water resources until a planned action has been implemented?	At first glance there seems to be a few broad green spaces / corridors reserved within the Masterplan map. However, I am curious about why broad corridors are missing / weak in other areas e.g. southern end. Please seek to improve. I wonder how the layout was informed by ecological evidence and recommendations - plus, on the other hand the (emerging) Nature Recovery Strategy would help inform opportunities for habitat enhancement. Stakeholders need to understand this aspect. Also there is an argument to optimise NOW because the nature gains can't be put back in at a later stage. Bear in mind the baseline landscape was perhaps not ideal - so there are potentially opportunities not identified (some species/groups and habitats would not be found in the surveys).	East Cullompton needs some food shops. Suggest a large supermarket goes in this location, Asda or Morrisons, also East Cullompton needs a new food pub for the very large community. Pub should be built in early stages of construction, so should supermarket. East Cullompton also needs other retail, eg, Halfords, Screwfix, Homebase, Shoe Fare, Currys, Superdrug, The Works or WH Smith stationers. If there is no retail in East Cullompton it will just turn into a commuter village and everyone will get in their cars and drive to Taunton or Exeter. So the point of the GV being a cycle friendly zone will be lost. Cullompton High street is very small and all the shop units are very small, so big new retail will not detract from High Street but make East Cullompton a destination point.	Will any of this new housing actually be affordable for local people like myself? All of the recent new developments created in and around Cullompton have focused on "luxury" 3,4 and 5 bed homes that are vastly more expensive than the average budget of local people. These new homes seem to be intended to house people from outside the local area, putting more pressure on our already over stretched local services and infrastructure. Please focus on providing the housing that is actually needed by local people who have grown up in this area first.
0 LIKES	1 LIKE	0 LIKES		2 LIKES	0 LIKES	1 LIKE
Reopening of Cullompton train station is vital as part of this development. This should be completed before the houses are finished and should also include a cycle network so that people can get safely to the train station on bike. A cheap car park should also be included in the train station to encourage people to use the train rather than driving in to Exeter or Taunton.	We've already had 2k odd in houses going in right now into north Cullompton. The works at Mill Gardens already cut our Internet off for a month and the college practice is on a generator again because their cables been cut...again. The houses going in at the Bloor site made that road a nightmare to navigate with them developing entrances on to the main road at the same time as Mill Gardens. It's too much disruption to local residents and wildlife at once. These developments need to be staged over years not months. It's too much and the towns existing community are going to suffer as well as the wildlife. Its awful, kind of regretting moving back here to be honest	Is this temporarily closed meaning it will reopen again? With so much money being made from development a little extra on getting the right information on the map may help.		Green landscaping places - Will this site be subject to maintenance fees on top of council tax? Personally these kind of schemes but me off buying new builds, its like paying rent for the land your house is built on which for people who already struggle to get on the housing ladder is off putting. Especially when there is no regulation on these charges and they can just be upped whenever the developers like with no cap. We've recently moved back here and it was so hard to find a house free of this entrapment. If the council wants to grant permission for large housing developments they need to pay for their maintenance. Its like buying a pet then expecting the breeder to pay for its lifelong care when you're their registered owner. They need to take some accountability and foot the bill.	A problem. Even when fully expanded Fordmore farm shop will never be able to provide the range of goods such as a supermarket like Asda or Morrisons. Therefore there should be plans in East Cullompton to bring in a new large supermarket store.	
3 LIKES	0 LIKES	0 LIKES		0 LIKES	0 LIKES	
The lack of hard commitment to constrain development until adequate infrastructure is in place is depressing. No hard commitment that I can see about the Link Road, and the reference to what Network Rail may or may not do re the Station is pitiful. With events to date, its difficult to have confidence that adequate constraints/conditions will be exercised on the developers. I have worked across the UK on significant infrastructure projects over the last 40 years and have seen what effective planning controls can leverage from Developers so why so lack-lustre here?	How can you build a housing estate right up to a large working dairy farm? Not only will it be rife with people wandering into the farm creating a theft risk but there's also issues from a health and safety perspective. It's completely brainless.	What is this? Not detailed in the key for the illustration (blue arrow)				
1 LIKE	5 LIKES	2 LIKES				
I read in the local media yesterday that the new railway station's gone from 2023 to 2025 for being developed. This is far too late. With over 2k in houses in north cully being built and the 5k in the east you'll need the railway ASAP. Cullompton always been a commuter town - people are going to be attracted to the M5 corridor not the sense of community. It's vital to have more sustainable transport options for all these people	A large part of the perimeter of this masterplan is a perimeter road with housing behind. There is no feathering of the masterplan out into green lungs, or softening down into parks or recreational areas needed by this scale of housing. What this does point to is further and further expansion in the future, bolting on more housing and desecrating farmland and existing habitats. Put a softer, greener edge to this masterplan so that the abruptness of the buildings is contained, don't use perimeter roads and provide evidence of the curtailment to the future expansion further outwards; or be truthful about the intention for this masterplan to be part of an even greater, even worse addition to an already disjointed, problematic unsuccessful small town. Fix the existing town problems/connection, use brownfield land first and provide a measured masterplan solution. This is none of those things.	Maybe someone could show the original outline of the Culm Garden Village on the same map so that we can see how it fits into what is now being called East Cullompton. I think the whole area for East Cullompton is much bigger than the Culm Village and people will be confused and think it only refers to the same area as it is not being shown as different.				
0 LIKES	7 LIKES	0 LIKES				
There is no way this motorway junction is going to cope with the amount of traffic these housing developments are going to generate. The motorway closed today and as usual the town bottle necked within minutes. The relief roads must be built before any more developments. Traffic congestion is not going to contribute to your eco plan. Also the bridge as a pedestrian is a nightmare to cross due to the volume of traffic and lack of crossings. That needs to be taken into consideration if you are expecting people to walk and use green corridors	Not entirely sure this will be the boundary and the pledge not to encroach onto Kentisbeare Parish will be broken intentionally.					
0 LIKES	2 LIKES					
What will be done to improve this junction? With all the added traffic, from the new houses that will be created, this junction will be unable to cope with rush hour traffic and commuters. Traffic already backs up at peak times everyday at this junction and through the town. Will the road improvements be prioritised and put in place before the bulk of the construction work takes place?						
1 LIKE						
All the people that live in East Cullompton or are part of the Garden Village will not be able to easily park when they drive to Cullompton About 10 spaces are being removed from the Higher Bullring to "improve" the area for bigger events for more people to attend. Not sure where any of them will park						
1 LIKE						
I feel that the Cullompton inner relief road needs to be completed and the Cullompton railway station re opened (should never have closed in 1960s) before any houses are built in the Cullompton Garden Village. Please please look first at the infrastructure.						
3 LIKES						

Transport	General Development	Questions/Other	Flooding	GI/BI/Landscape	Facilities	Affordable Housing
No obvious comment linking this long overdue development to the SPD. At Kentisbeare presentation it was stated that the Inner Relief Road (via CCA Fields) had to be completed BEFORE the Garden Village was STARTED. Recommend that it be clearly stated in the SPD that the Inner Relief Road be completed BEFORE the Garden Village is started. Indeed a section for such preconditions be added to the SPD document.						
7 LIKES						
No obvious provision for the possibility of linking the southern end of the Inner Relief Road (through CCA fields) to the relief road shown by Jenny Clifford when presenting the Garden Village running to the south of Honiton Road starting just east of the last house in Honiton Road and running close behind the existing houses to S Cullompton. Clearly if both roads are implemented then it would be COST EFFECTIVE to arrange for the intersection to be implemented at the same time. This should be a condition not an afterthought.						
3 LIKES						
There should be plans for this route to Exeter to be accessible without going through Cullompton town centre. There is already too much traffic in the town centre as it is.						
0 LIKES						
Is access via Greenhouse Gardens to be permitted for delivery of building materials and general building work? Access direct to building site from Honiton road (A373) would be preferred option by majority of residents.						
0 LIKES						
Clearly the existing plans show that unless the southern relief road discussed when the Garden Village was first mooted (or a northern relief road as suggested at the Kentisbeare presentation) is implemented the traffic on Honiton Road will substantially increase. All of the houses at the eastern end of Honiton Road have individual direct vehicular access onto Honiton Road. For these houses it is already difficult to get onto the road, especially if turning right. Given the failure of other traffic schemes to limit traffic speed in Cullompton (for example High Street, Silver Street in Willand, Tiverton Road) it is questionable that any traffic calming scheme will work. This is especially true if it is remembered that Highways may impose other restrictions on this road which is classed as an A road.						
2 LIKES						
Buried in the planning is a bit on the need for changes to Honiton Road. No detailed plans are evident but it proposes the use of 20mph speed restrictions. Just wondering how this will be enforced. The road currently has a 30mph limit but many motorists blatantly flout this limit. On the rare occasion we have speed cameras the traffic flows very slow compared to the norm. Are we still having the Garden Village relief road that was planned to run from A373 (between last house and farm entrance) that runs south of the existing houses to south Cullompton? This will reduce load on the road.						
0 LIKES						
When the Garden Village was first presented there was a relief road linking the A373 starting just east of the last house in Honiton Road and running to the north of the road shown in this presentation. It just clipped the corner of the field behind 25 - 27 Honiton Road. There is no reserved area for this item that was voted on in the previous presentation. If I understand the plan correctly the area is designated for housing. For some not a significant change but quite relevant for those living in Honiton Road. If this significant modification from the original plan what other "adjustments" have been sneaked into the plan?						
0 LIKES						
Where's the new relief road? This council should get its priorities right before making big plans						
4 LIKES						
Some time ago it was determined that there would be a relief road that linked Honiton Road (about where the 40mph sign is) around the southern side of the houses and linking up to existing roads in the southern end of town. This would then allow the Garden Village traffic that wanted to go to S Cullompton (for example Aldi or Bradnich) to avoid the M5 bridge. Has this relief road been cancelled thus forcing all traffic along the existing road (A373/Honiton Road) to add to the chaos at the M5 Junction?						
0 LIKES						
It looks like a Blundells Road problem in the making!						
3 LIKES						
I hope there are bridges to accommodate safe access across the busy A road as the plan is to make every where accessible within 20 walking or cycling minutes.						
1 LIKE						
Will these new homes have adequate parking? I understand that the plan is that every part of the development will be accessible via walking/cycling, however, people living here will still most likely need a car/vehicle to commute to and from work or to get to Exeter and Taunton etc.						
I LIKE						
This route is still an outline plan. There is plenty of scope for making this route a bespoke alternative to Honiton Road rather than trying to modify Honiton Road. For example ensure that all vehicular access is via service roads and not directly onto the road						
1 LIKE						
Honiton Road is a very busy A road. Making it a 20mph zone is crazy if there is not an alternative route for large HGVs and other routes. So build a new road from Kingsmill Lane up behind the back of East Cullompton connecting to Honiton Road by a roundabout in the area of Aller Barton. This would take all the heavy traffic off the existing Honiton Road. When there is a new road to take heavy traffic and only when that is built and open could the existing Honiton Road become a 20mph road.						
0 LIKES						

Appendix 2 Summary of changes

Topic	Comment	Changes made
Infrastructure	Substantial infrastructure needed first. East Cullompton will benefit from a 'Site Wide Phasing and Delivery Plan document'. The document should benefit from sufficient weight in the planning process, clearly outlining requirements and delivery mechanisms, to ensure that the development achieves appropriate phasing in terms of housing, education and employment. SPD text should reflect Local Plan that development will require some external funding.	Infrastructure requirements and delivery trigggers set out within policy. The SPD requires a site wide infrastructure delivery plan to be agreed, mechanisms for delivery to be set out within this process. The infrastructure delivery section includes references to the need for external funding and some additional text added for clarity.
Honiton Road	A373 is a major concern; major improvements needed. Outcomes from the Junction 28 mitigation option work need to inform the policy approach for the role and function of Honiton Road. This includes decisions regarding priority and speed limits. Honiton Road is an A road so downgrading this and reducing the speed limit are unlikely to be achievable. Crossings of this road are going to be important given this road passes through the middle of the development but the strategic nature of the road cannot be lost. 20mph requirement goes beyond a principle and should refer to the aim/objective of safer streets. Key roads (Honiton Road) may need to be higher speeds – to be proven at application stage that principle is met.	The SPD requires careful consideration of the treatment of Honiton Road to provide a safe environment for people and to continue to function as an A road. Detailed design of Honiton Road to be included in the infrastructure delivery plan requirements. The SPD references the need for further technical design and assessment of the approach to Honiton Road. Reference to a 20mph speed restriction removed but left emphasis on the need for design solutions to slow speeds retained.
J28	Improvements to the motorway junction should be carried out first; the allowance of 500 houses before delivery of junction improvements now seems too high. It should be clarified that the 'required after first 500 homes completed' is subject to the prior delivery of the Town Centre Relief Road. National Highways require confidence that a proposed scheme adequately mitigates the SRN impacts of development at Cullompton and provides safe and suitable facilities to accommodate increased active	The SPD reflects existing policy requirements for improvements to J28. Text added to reflect requirement for TCRR. Further work on J28 improvements and modelling of the capacity of the junction is being carried out through separate workstreams.
Town Centre Relief Road	SPD should make it clear that the TCRR needs to be delivered first. Query whether the 'Delivered by 2023' timetable is realistic	SPD to be updated to reflect delivery timescale.
Street hierarchy	Lack of any reference to the use of Saunders Way as part of the vehicular mobility strategy. The road should connect into the main street of East Cullompton and that this should be referenced as an option in the SPD. A new road is proposed to run south (and then west) from Honiton Road. important to recognise that the masterplan is strategic in nature and does not intend this to define the precise location which will instead be defined through planning outline and detailed applications.	Masterplan amended to show link into Kingsmill. Text added to clarify that streets could take a different alignment subject to preferred junction location.
Sustainable transport	Sustainable transport options should be delivered early to promote step change in behaviour. J28 capacity improvements still required for car borne movements.	Infrastructure requirements and delivery trigggers set out within policy. The SPD requires a site wide infrastructure delivery plan to be agreed.
Active travel	Pedestrian and cycle routes should have signage. Active travel improvements are funded by developer contributions/ linked to public funding projects – further thought is required regarding costs and likelihood of funding mechanism achieving delivery. Reference to central, southern and northern active travel crossing of the M5, but with only 2 shown and 'potential' future crossing to north part of CGV. Flexibility in timing of delivery of active travel connections across the M5 corridor is crucial given the opportunity for limited release before M5 junction improvements combined with the need for these junction improvements to facilitate active travel connection across the M5. The footway connection along Honiton Road is not complete and some areas are on private land. The whole length would need upgrading to a pedestrian/cycle footway and it is questionable whether this should be next to the busy A373 or whether a completely segregated route elsewhere should be provided instead.	SPD to refer to the need for signage. Further work being carried out on sustainable travel through separate workstream. The SPD requires a site wide infrastruture delivery plan to be agreed. No change to SPD - mobility plan shows 3 crossings. Approach to delivery of active travel crossings clarified. Infrastructure delivery table amended to include delivery of active travel in early phases and in line with capacity improvements to J28.
Mobility hubs	Not clear on what the mobility hub is; not sure it will be successful in a rural community.	Additional text added to expand information on mobility hubs. Further work being carried out on mobility hubs through separate workstream.

Topic	Comment	Changes made
Primary school	Location not safe due to proximity to Honiton Road; school needs to be at the heart of the development. The primary school is next to the main road. This is a dangerous area for young children. It will also cause more congestion at drop off and pick up times along an already over used road. Whilst this SPD cannot change adopted Local Plan policy, we consider that the SPD should not repeat this requirement from the Local Plan for the school to be delivered in phases 1 and 2.	SPD requires traffic calming and safe crossing points. Text amended to include flexibility on location of primary school to north of Honiton Road and addition of requirement for safe school access and appropriate space for drop off away from primary streets. No change to SPD wording for delivery of school - policy requirement.
Healthcare	No allocation for doctor or dentist.	Text added to expand on potential uses within community hub and multi-use community building. MDDC in discussions with NHS.
20 minute neighbourhood	The SPD could be clearer in defining the 'twenty-minute place' approach to ensure meaningful achievement of this principle.	Commentary added about application of 20 min neighbourhood at local scale and context
Community hubs: location	Wrong location for community hub: too far east - assumption of further development to the east. Fordmore should not be the principal community hub. Not central to the allocation; does not deliver a 'heart' to the development. Encourages too much development along the Honiton Road. Should be co-located with school and healthcare.	Text clarified to explain why Fordmore will be principal centre, and that it will expand to provide broader range of uses including further retail and community space, that it will be accessible (via primary street and active travel) and that it would have potential to expand further if proposals for the GV proceed. Honiton Road requires active frontages in order to reduce the speed limit. SPD to include flexibilty on school location, however, current location provides safe walking to community hub.
Community hubs: uses	Small community hubs do not provide required facilities for the number of houses. Need for an indoor meeting/activity space to cater for a range of activities. Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment. SPD not clear whether residential can be included in community hubs - green box on page 87 refers to retirement services but not clear if this means retirement living. Community hubs should exclude green space. Fordmore north and south would decrease to 2ha in tune with local plan requirement for local centre.	SPD to provide further explanation on what community hubs should contain. Reference to community buildings to include catering for a range of indoor sports and activities and potential for a health hub. Specific reference to teenage play to be included. SPD changed include allowance for some residential where it does not detract from intended character or limit community hub functions. No change proposed to exclude green space. Some public / open space to be delivered as part of bespoke community hub typology. Larger area also required to allow residential uses and some land covered by existing uses. Requirement added for clear governance to be set out in developer proposals.
Commercial uses	Fordmore Farm will not be able to provide larger retail / supermarket that is needed. Suggest a large supermarket, a new food pub, other retail to make East Cullompton a destination. Size of industrial units and type of industry needs to be carefully considered - shortfall of micro and small units making start-up business difficult. SPD does not reflect the consented development at Fordmore Farm (21/00349/FULL) (Class E development, agricultural style warehouse type buildings). Commercial area in right place, strong east-west cycle route good. Less understood is primary road through commercial area (not attractive gateway). Not clear how amount of land to meet 32ksqm employment floorspace has been calculated. Interaction between commercial areas and mixed use community hub is not clear with reference that these have overlapping uses. It is unclear whether these built forms include curtilage areas, such as parking. The total land budget from these inputs does not meet 160ha.	SPD includes retail within the commercial area as well as within the community hubs, and sets out appropriate uses for commercial areas. Text changed from 'integrating employment' to 'integrating commercial' – text already refers to appropriately scaled retail being provided in this area. SPD updated to reflect consented development. No change to primary route through commercial area which should be designed to be attractive – not industrial area. Further explanation on commercial land calculation provided.
Sports facilities	Not clear where sports facilities are going to be within the allocation. 3G sports pitch needed in Cullompton area. In order to provide a flexible, sustainable site which could accommodate a variety of pitch sizes and sports, a site of four hectares is recommended, which includes provision of a clubhouse/changing facilities.	Text amended to confirm size of space at Fordmore Farm is sufficient to provide a multi-pitch hub rather than individual pitches but final location of sports pitches to be confirmed. SPD to make specific reference to sports being provided in accordance with MDDC's Playing Pitch Strategy. 3G pitch is not a specific policy requirement but is required in the Cullompton area by the Playing Pitch Strategy.

Topic	Comment	Changes made
Green space	Not enough and all at the edges - larger green space needed on Cullompton side. Better dog walking parks. Feather into the edges of the development; more trees and hedges included; include allotments. Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children & families. Unclear which areas will have the space to function as parkland and nature reserve rather than just as functional travel corridors. It would be useful if the SPD could include a map to show the preferred locations for the 6ha of amenity green space; the public parkland; and the nature reserve. Eastern Loop would act principally as a leisure route providing indirect routes in place of active travel desire lines. The interaction with the countryside would be inherently limited by the predominant definition of the allocation edged by hedgerow boundaries.	Text expanded on green space uses, including allotments and what can be included within the community greens and green corridors. Community growing space such as orchards in community greens and traditional allotment sites provided separately within strategic GI. Changes made to make clearer requirement that detailed proposals demonstrate an appropriate building and landscape treatment to rural edge. Eastern Loop is not a formal road but active travel route Community greens allow for free play.
Fords	Fords should not be prioritised. Implications for flows and water quality.	Text amended but aspiration for fords as crossings to remain to provide place making connections with water.
Climate change	Houses should be net zero with renewable energy. Climate change adaptation could be addressed more explicitly in the sub-section on Natural Capital. Further emphasis should be put on the phrase 'reduce carbon emissions'. The NPPF uses the phrase 'contribute to radical reductions in greenhouse gas emissions'. Strong digital connectivity should be included in the table as a Substitute Approach to achieve reduced carbon emissions.	SPD sets out net zero/renewable energy expectations from developers within existing policy framework. Natural Capital section expanded to add requirements under 'enhancing the landscape structure' for planting to demonstrate climate resilience and biosecurity. Change to carbon emissions and digital connectivity text made.
Air quality	Although air quality assessments are required, they will need to be monitored at regular intervals through the construction phases and afterwards.	Change to text made.
Density	Flexibility should be afforded to residential densities towards the edges of the community.	Density expressed is an average. Text amended to reflect treatment of rural edges.
Drainage	Permeable paving could be used as well as rain gardens, swale, filter trenches.	Permeable paving added to text.
Residential	Affordable homes should be a mixture of rents and purchase options. Other housing options should be considered such as co-living accommodation blocks and adaptable homes. Wheelchair accessible homes should be included within the housing designs to be fully inclusive and giving options for a range of clients. The design of homes needs to consider the pavement space and access to homes for people with mobility vehicles. The requirement for front gardens and bike storage overly prescriptive. Storage can be provided in back gardens and not all houses need a front garden.	No change required. Policy sets housing requirements which will be dealt with at planning application stage. Reference to access added. Change made to separate out requirement for front gardens and storage of bikes.
Self build	Space should be allocated to self build.	This is a policy requirement and is set out in the SPD. Additional text added on custom and self-build added.
Parking	Less emphasis on 'strategic provision' for parking as a preferred strategy to enable flexibility in approach as applications progress and the delivery of electric vehicle charging.	No change. The SPD provides for flexiblity.
Waste	Could be expanded to ensure waste is minimised and considered during the design and layout of a development. Include reference to Devon Waste Plan.	Changes made.
Power lines	Concerns raised regarding the potential implications of the draft masterplan for National Grid's strategically important 132kV line. National Grid do not support undergrounding. A 10m wide corridor of open ground would be required above the undergrounded cables. Moving power lines is at the landowners' expense. Suggest wording: "The land over which the lines pass within the site benefits from 'lift and shift' clause over the route easement. This enables the landowner (at their cost) to alter the path of the power lines if an alternative route is available". 16ha affected by the 440kv powerlines does not have a note to accompany this figure - could usefully explain that this area enables another 16ha of green infrastructure. Reasonable to advise that some commercial could come forward in the 440kv powerline corridor.	SPD refers to aspiration for undergrounding but further work needed. SPD to be updated to reflect 10m corridor. Wording added that where powerlines are undergrounded, they do not have to follow the existing overhead line which could allow better accommodation of easements. Wording on lift and shift clause amended. Note regarding the 16ha area and that commercial could be appropriate as mix of uses if included sensitively.

Topic	Comment	Changes made
Heritage	Settings of heritage assets on maps indicate risk of harm but further work needed; no robust evidence base and justification for, or mitigation of, any harm to the heritage assets, or their settings. Archaeological investigation will need to be used to identify opportunities to positively influence the detail of design/layout as planning applications come forward, as well as to inform mitigation for the loss of any undesignated archaeological assets. Grade I listed Wood Barton should be shown as a significant listed building.	Maps to be changed to refer to indicative settings of heritage assets with further assessment required for planning applications. SPD to specify further work required by developers prior to their layouts being set. Text changes made to archaeological assessment. Wood Barton already shown but annotation added.
Biodiversity net gain	It is disappointing to note that the SPD is seeking offsite delivery of BNG, as onsite delivery is Natural England's preferred approach. Text should reference country park is not a local plan requirement. SPD oversteps in referring to BNG being delivered adjacent to boundary and must achieve landscape enhancement.	SPD changed to reflect onsite delivery first. Wording changed so that the off-site BNG can be delivered in suitable areas that provide accessible greenspace for the allocation as well as adjacent to the allocation boundary.
Country Park	Not clear what this is or when it is likely to be delivered; need for a water park not established.	Text changed to expand the explanation of the country park. This is outside the area for the East Cullompton SPD but could start to be delivered through off-site biodiversity net gain and sports facilities.
Proximity to Kentisbeare/need for a green buffer	Wider garden village section shows development encroaching within Kentisbeare Parish.	No change to SPD. SPD is clear that the plans in Section 6 are indicative and the wider garden village is subject to the Local Plan process. Comments on Section 6 to be reported to policy team.
Sports clubs and all-through school	Sports facilities and all-through school shown along Horn Road should be in Cullompton and not in Kentisbeare Parish.	No change to SPD. Cricket club already has planning permission. This area is outside the East Cullompton SPD area and plans in Section 6 are indicative.
Potential wider area for garden village	Area shown for wider garden village includes listed buildings and areas of wildlife importance.	No change to SPD. SPD is clear that the plans in Section 6 are indicative and the wider garden village is subject to the Local Plan process. Comments on Section 6 to be reported to policy team.
Two-stage masterplanning process	The two-stage nature of the process: detailed approval of the allocation and an outline of thoughts about the longer term possibilities. One consequence is that facilities that are only required for a larger garden village may well be located outside the central area. More detailed planning should be undertaken before the East Cullompton Masterplan is signed off.	No change to SPD. The SPD can only focus on allocated land and unless/until further land is allocated, boundaries are not known and the whole area cannot be masterplanned.
Green boxes within SPD	These would benefit from either greater flexibility or a two tier structure for broader 'objectives/aims' and more tightly defined 'requirements'.	Text added to allow appropriate flexibility.
Process	Process diagram not clear on where Design Code and Phasing and Infrastructure Delivery Plan fit within the planning process. Approach to these documents needs further consideration and clarification.	Diagram updated and approach clarified. Both documents will need to be agreed with landowners / developers.
Design code	Further consideration needed on what a strategic design code should contain and how it works through the planning process. Appendix 1 needs further consideration. Design code not the right place to consider site-wide SUDS. Needs further technical work through planning application process.	Further work needed with landowners/developers to scope out strategic design code. Reference in SPD text changed and Appendix 1 removed. Site wide SUDS strategy removed. Strategic drainage requirements are incorporated into SPD, although treatment of SUDS retained within Design Code requirements. Further work needed for planning applications.
Corrections	References should be to National Highways not Highways England. On Page 109, Junction 28 rather than Junction 30. Clearer if 'profound change' bullet points retitled as 'profound change, evolving public policy and guidance'. Land outside allocation to east of Fordmore shown on all section 5 plans should be removed. 'East Cullompton Activity Framework' page 84. The key does not identify what is meant specifically by the thicker and thinner black lines. Key to community greens on plans is not clear.	Changes made
Evidence base	SPD should list background reports that it relies on.	No change. Unnecessary as these are published on the website as available.



East Cullompton Masterplan

Supplementary Planning Document

January 2023

Mid Devon DISTRICT COUNCIL

Culm Garden Village

This Supplementary Planning Document has been prepared by LDA Design on behalf of Mid Devon District Council with contributions from:

Vectos: Transport
City Science: Carbon Reduction Strategy
BSG Ecology: Ecology
Environment Systems: Ecosystem Services
WSP: Flooding and Drainage
BE Group: Employment and Skills

Version:	1.4
Version date:	January 2023
Comment	Draft

This document has been prepared and checked in accordance with ISO 9001:2015



East Cullompton Masterplan SPD

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East Cullompton Masterplan SPD

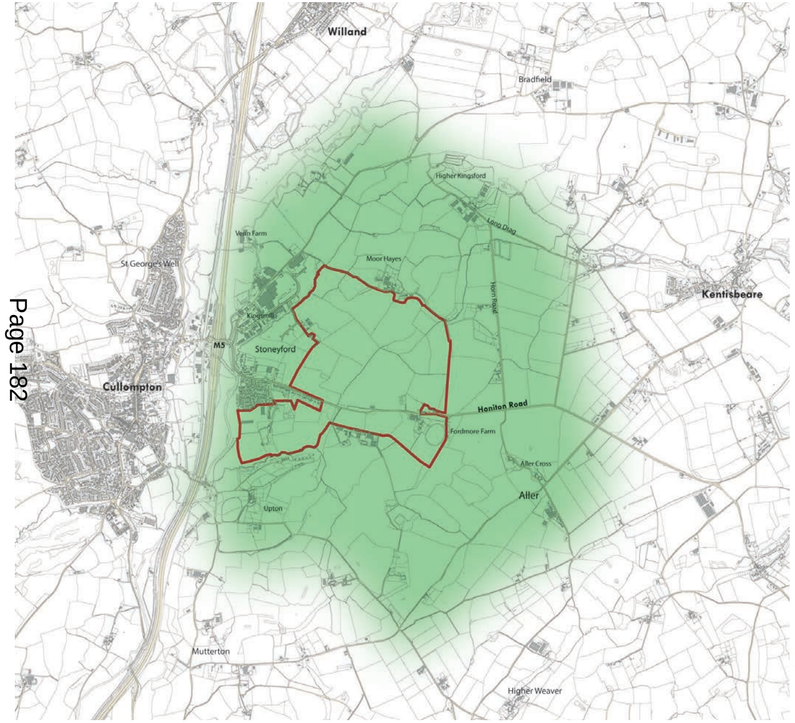
SECTION ONE

INTRODUCTION

Background

Location

Scope and Purpose of the SPD



East Cullompton allocation area and potential area of consideration for wider Garden Village and Country Park

East Cullompton Masterplan SPD

1.1 Background

This Supplementary Planning Document (SPD) has been prepared to support the development of the allocated land east of Cullompton and the M5 (East Cullompton) to provide around 1750 homes plus at least another 850 post 2033, community and commercial facilities, public open space and general landscape and biodiversity enhancements. This SPD has been prepared on behalf of Mid Devon District Council.

This document provides guidance about how East Cullompton should be designed, developed and delivered in accordance with the sites allocation under Policy CU7 and in accordance with other relevant policies of the Mid Devon Local Plan.

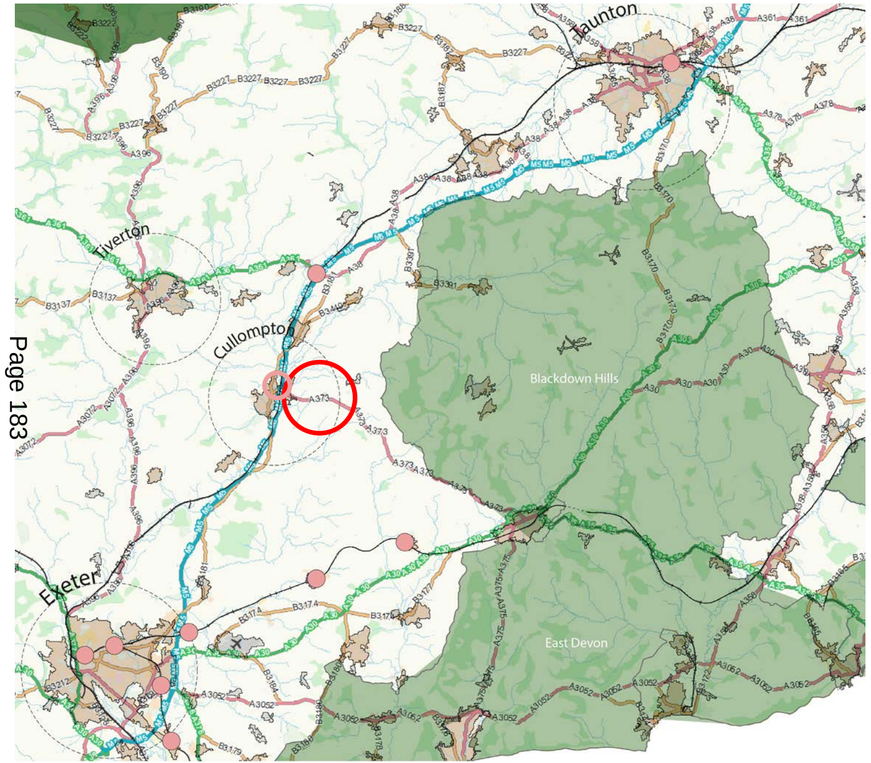
Whilst this document must work within the scope of the existing allocation and build upon the relevant East Cullompton policies within the Mid Devon Local Plan and Stage 1 SPD, it is clear that this document is also prepared during a period of profound change and evolving policy and guidance, namely:

- The urgent need to respond to the climate emergency and Mid Devon District Council's aspiration to become carbon neutral by 2030;
- The changes to the way we live and work as a result of the global pandemic;
- UK Government's future plans for the delivery of Culm Garden Village, one of 14 areas awarded Garden Village status in 2017 with the potential to deliver up to 5,000 new homes through the expansion and growth of East Cullompton;
- The introduction of the Environment Bill 2021 which supports nature recovery and biodiversity net gain;
- To embed principles for designing the built environment to improve health and wellbeing, having regard to best practice guidance such as Building for a Healthy Life.

This SPD will set design and delivery requirements for all future planning applications in East Cullompton to ensure that:

- Development aligns with requirements in Policy CU11 to minimise the carbon footprint of the development and meet Mid Devon District Council's aspirations to deliver Net Zero by 2030;
- It will follow the Garden Community Principles set out by the Town and Country Planning Association;
- It will follow the guidance set out in the National Model Design Code;
- It follows the principle that the future growth of Cullompton is about the creation of one place, where East Cullompton and a future Garden Village will form integral parts of a more self-supporting and self reliant Cullompton in the future;
- It will be fully capable of growing and expanding into and forming part of a future Culm Garden Village;
- Phasing and delivery will be designed from the outset and at every subsequent stage in its development, to create place and support and encourage new ways of living and working;
- Transport, energy or other Infrastructure is designed to serve East Cullompton but also forms part of a bigger connected network to allow for integration and connection with a future Garden Village and the wider town;
- At every stage in its development, the existing and the newly created landscapes into which East Cullompton is embedded will deliver a wide range of benefits from biodiversity net gain to high quality greenspaces to successful water management and flood attenuation.

This document is informed by extensive contextual analysis, technical survey work and local consultation that has been undertaken by the Council and its partners in relation to the East Cullompton allocation.



Strategic Location of East Cullompton

East Cullompton Masterplan SPD

1.2 Location and overview of the opportunity

Located in the Culm Valley of Mid Devon, Cullompton is centred on level ground on the western valley side of the River Culm. The Town has grown from this centre but is largely still contained within the valley sides. The name Cullompton is likely to be derived from the Celtic river name cwlwn ('looped' or 'winding' river) and –ton, suggesting an important early estate centre. The town has a varied character reflecting almost 2000 years of historical development. Cullompton will continue to develop as a fast growing market town and will be the principal focus of development for the district in the medium to long term in accordance with the development strategy set out in the Local Plan.

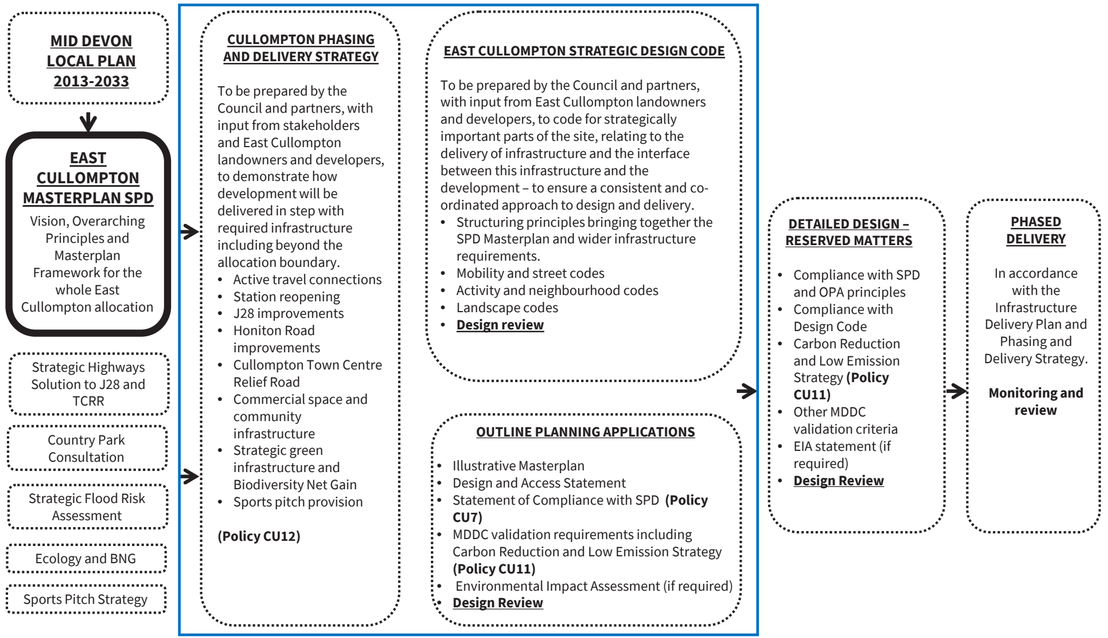
Cullompton is well located strategically within the south west. It is situated 11 miles north of Exeter and about 20 miles south west of Taunton. The M5 motorway runs close to the east side of the Town Centre. The B3181 runs through the centre of the town and links Exeter and Willand. The mainline railway runs alongside the motorway to the east. There is an existing station at Tiverton Parkway and there is a commitment from the Council in the Mid Devon Local Plan to re-open the train station at Cullompton. Highways improvements including Town Centre relief road and junction improvements are also planned in addition to the reopening of the railway station to improve the area's accessibility credentials. With work still underway on the preferred solution to address capacity issues at Junction 28 of the M5, this SPD has been designed to work with a number of solutions currently being considered.

New and existing residents will be in close proximity to job opportunities within Cullompton and also at Willand, Tiverton and Exeter. Future employment provision is expected to be centred around the Kingsmill industrial estate and within East Cullompton. The combination of highways improvements and a new railway station and the strategic growth of the town provides an opportunity to significantly raise the profile of Cullompton within the wider area. The major growth of the town will provide the opportunity to revitalise the town centre through additional investment, traffic and transport improvements. The growth of the town and proposed improvements will provide a significant boost to its vitality and viability, providing a more attractive environment.

The Wider Culm Garden Village Opportunity

This document provides comprehensive guidance in relation to the East Cullompton site allocation, as defined in the adopted Mid Devon Local Plan. However, reference is made to the wider Culm Garden Village opportunity. Culm Garden Village is one of only 14 areas initially awarded Garden Village Status by the Government in January 2017, with the potential to deliver up to 5,000 sustainable new homes in a country park landscape, with jobs, community facilities and transport, all integrated as part of the growth of Cullompton.

This SPD for the East Cullompton Allocation has been developed alongside the preparation of a Masterplan Framework which considers the wider Culm Garden Village opportunity. This has been done to ensure plans for East Cullompton could be successfully expanded into the wider Garden Village should that project come forward. The opportunities set out for the wider Garden Village are intended to provide a commentary only, further work will be required to define any proposals definitively and will be explored through the new Local Plan for Mid Devon 2023-2043 including opportunity for further community engagement.



NB: Work within the blue box can be progressed in parallel but the Phasing and Delivery Strategy and Strategic Design Code are to be complete before determination of planning applications.

Planning and Design Process Flow Diagram: The role of the SPD in relation to the Local Plan and the planning application process

1.3 Scope and purpose of the SPD

The Mid Devon District Council Local Plan allocates land to east of Cullompton and the M5 for the development of 2,600 new homes (1750 plus at least another 850 post 2033) alongside other commercial and community uses over the period to 2033 and beyond. The East Cullompton SPD supplements the adopted Local Plan policy for the area and has also been prepared in accordance with national planning policies and following a statutory consultation process. The SPD will form an important material consideration in the determination of subsequent planning applications for development of the site.

A Framework Masterplan for the wider Culm Garden Village opportunity has also been prepared and enclosed with this SPD. The East Cullompton Masterplan SPD reflects the principles and concepts of the wider Garden Village opportunity to ensure that East Cullompton could grow successfully and holistically in the future should the Garden Village project progress.

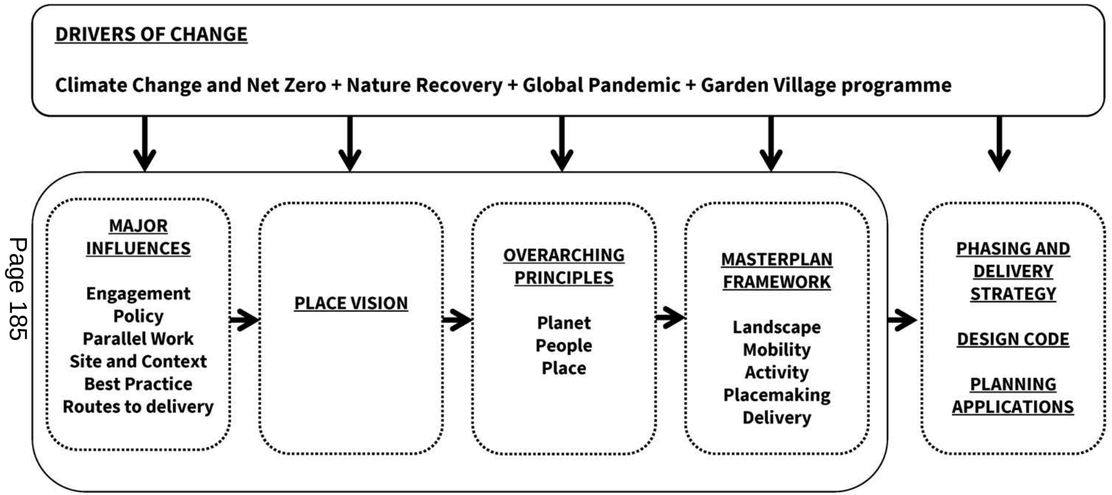
However the East Cullompton Masterplan has been planned as a cohesive place in its own right within the emerging allocation area and statutory policy context. The SPD sets the requirements for the East Cullompton Allocation only. Any proposals for the wider Garden Village will be subject to separate Local Plan and planning application processes and have been included in this SPD as indicative context for future growth only.

The Masterplan SPD sets a vision and overarching principles for the new development of East Cullompton. It also provides detail to supplement the strategic development plan policies for the site by setting specific design requirements. The Masterplan Framework identifies the major land uses and infrastructure to be accommodated and broad principles relating to phasing and delivery to ensure a comprehensive approach.

The masterplan SPD is strategic in nature and does not intend to define the precise location and extent of elements of the plan, this will be defined through planning applications and work to agree the detailed phasing and delivery strategy. The requirements set by the SPD for East Cullompton are highlighted in a green text box. Developers are expected to demonstrate in future applications through a Statement of Compliance how these requirements have been met as well as how plans will support the Vision and Overarching Principles in Section 2.

More detailed work will need to be undertaken following the SPD. The Planning and Design Process Flow Diagram illustrates where the SPD sits in the planning process and the further phases of work that will be required for the design and delivery of comprehensive development. These include a more detailed Phasing and Delivery Strategy and a Strategic Design Code. Section 5 of the SPD sets these processes out further.

Planning for the outcomes we need



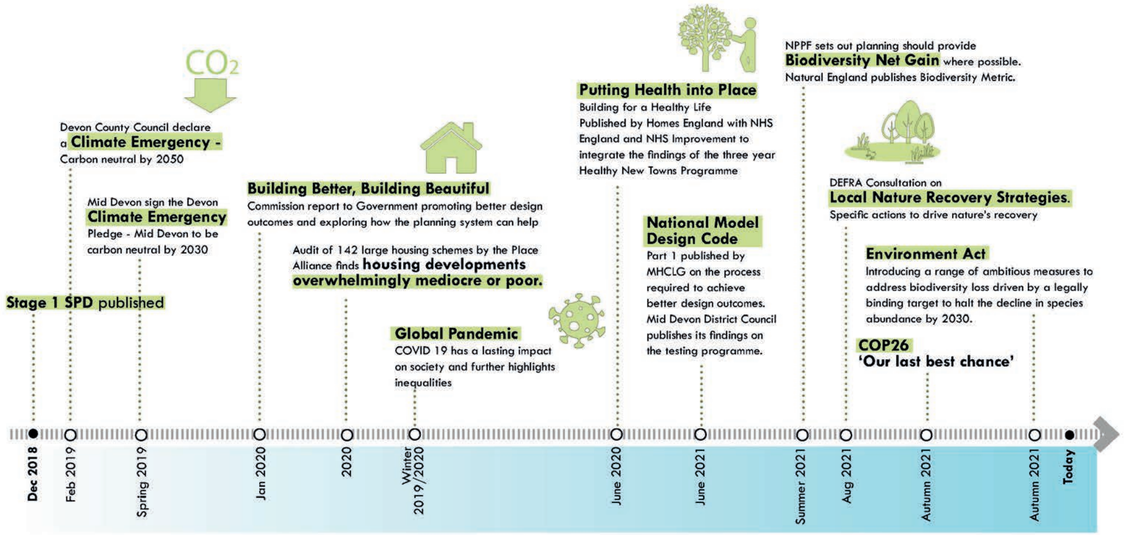
Flow diagram illustrating the design process taken to the preparation of the SPD where major drivers of change such as climate change and nature recovery are seen as cross cutting themes which must guide every stage of the process. The SPD stages shown on the left indicate how the Masterplan Framework has been driven by a clear Place Vision and Overarching Principles which have in turn been defined by an appreciation of the major influences such as policy context, local engagement, routes to delivery and site characteristics.

SECTION TWO

VISION

Planet People and Place – A vision for East Cullompton, a future Garden Village and the whole town

Overarching Principles



Timeline of major influences that have emerged since the consultation on the Stage 1 SPD.

2.1 Planet People and Place – A vision for East Cullompton, a future Garden Village and the whole town

Much has changed since 2018 and the subsequent work undertaken on Stage 1 of the East Cullompton SPD. The pandemic in 2020 changed the way we live and work and in this period, Mid Devon District Council has declared a climate emergency, setting out the aspiration to become Carbon Neutral by 2030. In November 2021 at COP26 151 countries submitted new climate plans to limit global temperature rise to 1.5 degrees C and to cut global emissions in half by the end of this decade.

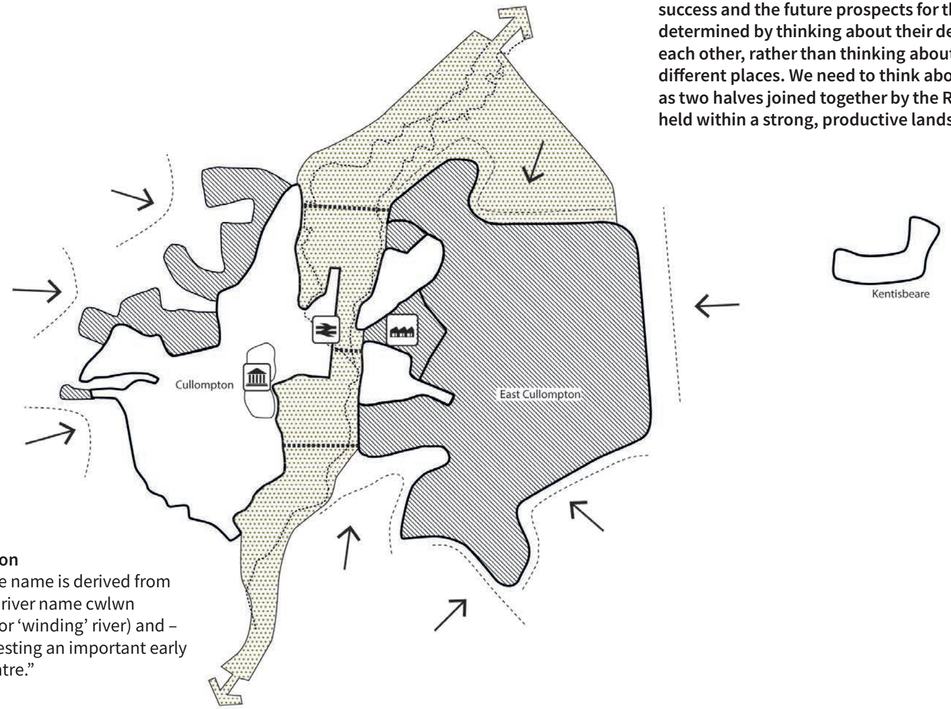
If we are to meet these targets then we need to make radical changes to the way we plan for development and growth. This SPD for East Cullompton and the wider Culm Garden Village masterplan framework that accompanies it marks the beginning of a new era. The typical patterns of development and "business as usual" solutions that we have all become accustomed to will fail to cut carbon and prevent us from adapting to new ways of living and working. From now on, we have to plan differently for a Net Zero future with the right balance of prescription and flexibility, with the express aim of delivering a Net Zero outcome, while creating a great place to live and work, all set within a healthy and bountiful Devon landscape and place that belongs to Cullompton.

This SPD is specifically about East Cullompton but the wider message is about the growth and development of Cullompton itself. The town has over 2000 years of history and its cycles of success and decline, growth and retreat, have reflected the massive shifts in social and economic change whether that was the wool trade or the arrival of the railway. In the first part of the 21st century growth on the scale envisaged here has been driven by the success of the Exeter City Region and although this is still largely the case, we need to shift our focus away from growth that perpetuates behaviours like out-commuting by private car or the continued physical separation of the home from the workplace or place of study and plan for a more circular economy. The growth of Cullompton to the east must be more resilient into the future, more self-supporting and interdependent with existing parts of the town.

The world is changing fast. East Cullompton can play a huge part in helping Cullompton become more self-supporting and resilient in the face of the climate emergency by offering greater choice and opportunity for its future residents in terms of how and where they work, choice of homes, place to learn and train, healthy living, greater access to the rich Devon landscape surrounding Cullompton and nature recovery and thriving. It can look to address some of the bigger challenges we face too like energy self-sufficiency, providing opportunities for local food growing and supply and harnessing the waters of the Culm and its tributaries for the benefit of nature and flood management.

East Cullompton is at the centre of what could become, in time, Culm Garden Village and must embrace Garden Village principles, including new approaches to how places like this are managed

East Cullompton can embrace Garden Village principles to feel different from Cullompton, but its success and the future prospects for the town will be determined by thinking about their dependence on each other, rather than thinking about them as two different places. We need to think about Cullompton as two halves joined together by the River Culm and held within a strong, productive landscape.



Cullompton
"The place name is derived from the Celtic river name cwlwn ('looped' or 'winding' river) and –ton, suggesting an important early estate centre."

Conceptual plan or 'mental map' of Cullompton in the future

and governed over time. East Cullompton will feel quite different from Cullompton but its success and the future prospects for the whole town including a future Garden Village will be determined by their interdependence on each other. We must think of them as one place rather than two different places.

The river, the railway and motorway might be regarded barriers for now, either real or perceived, but that must change over time and the development to the east must not only be seen as supporting the town centre and the existing communities and neighbourhoods in Cullompton but that it must also offer new facilities, new choices and new experiences to the east of the town, for the benefit of the whole town.

The mental map of a future Cullompton will change with expansion to the east, forming the shape of a butterfly with the historic form of the town and the River Culm at its centre. The analogy of the chrysalis gradually emerging as a butterfly in the future is quite a good way of thinking about future growth and the identity of Cullompton as a whole as it grows and evolves.

In the Stage 1 SPD there were nine principles set out for East Cullompton and they all remain important and are still highly relevant but there is an urgent need in the face of the climate emergency to strengthen the messages and to set out a vision for East Cullompton that is not only clear about what we must deliver but also be mindful and alive to how it connects to a changing town and how it might evolve and grow into the future Garden Village.

We have simplified and reinforced these principles under the headings of Planet, People and Place. Everything we do in relation to the masterplan framework for East Cullompton must keep these three driving principles in perfect balance and go on to demonstrate how we deliver the step changes required through practical and deliverable planning requirements and through good design at every stage.



Illustration of how East Cullompton could be developed following the overarching principles

2.2 Overarching Principles

By putting Planet, People and Place right at the forefront of the vision for East Cullompton, the development principles can deliver the outcomes we want to see, namely:

Planet

Regard Cullompton and East Cullompton as one place, make them interdependent and mutually supportive. This will strengthen the local economy, making the town more resilient. It will reduce out-commuting, reduce carbon emissions, improve air quality and reduce noise and dust.

Transform water management and habitat creation in this part of the Culm Valley to reduce flooding, increase biodiversity and to make water and wildlife central to day-to-day life in East Cullompton.

Combine locally-sourced clean energy with reduced energy demand and energy-efficient, durable and adaptable buildings.

Protect natural resources, including existing vegetation and local soils and local habitats. Reconnect and strengthen local landscapes and increase woodland cover.

Use innovative and modern methods of construction to minimise waste and reduce pollution. To ensure waste from development can be minimised and to reduce inert material exported off site.

People

Improve human health and well-being by favouring walking and cycling over other modes, improving air and water quality and improving contact with nature.

Build a sense of community and sense of belonging around existing activities and uses and around the new community centres. Make them pedestrian-friendly and keep them largely traffic-free.

Offer choice and make better homes and workplaces that are flexible and adaptable for changing lifestyles.

Build sociable streets and rural lanes that encourage neighbourliness, outdoor living and outdoor play.

Make sure everyone is within a few minutes walk of a park or a greenspace or the opportunity to follow or cross a watercourse.

Place

Make it a compact and village-scale, combining well-crafted buildings and spaces that are pedestrian-friendly. Make the neighbourhoods safe by reducing traffic speeds and the dominance of cars.

Bring the scale of infrastructure down with narrower streets and spaces, something more in keeping with a village character.

Bring the rural character of East Cullompton alive by incorporating existing rural tracks, the hedgerows and the mature Oak trees that characterise this area.

Make the active travel and bus routes between East Cullompton and the town into green lanes that are rural in character.

Celebrate the presence of water and the crossing of, or the following of, watercourses part of the experience of daily life, such as the route to school or the workplace, or the journey to and from the new station or to the local shops.



East Cullompton Masterplan SPD

SECTION THREE

INFLUENCES

Policy Context

Carbon Principles

20 Minute Place

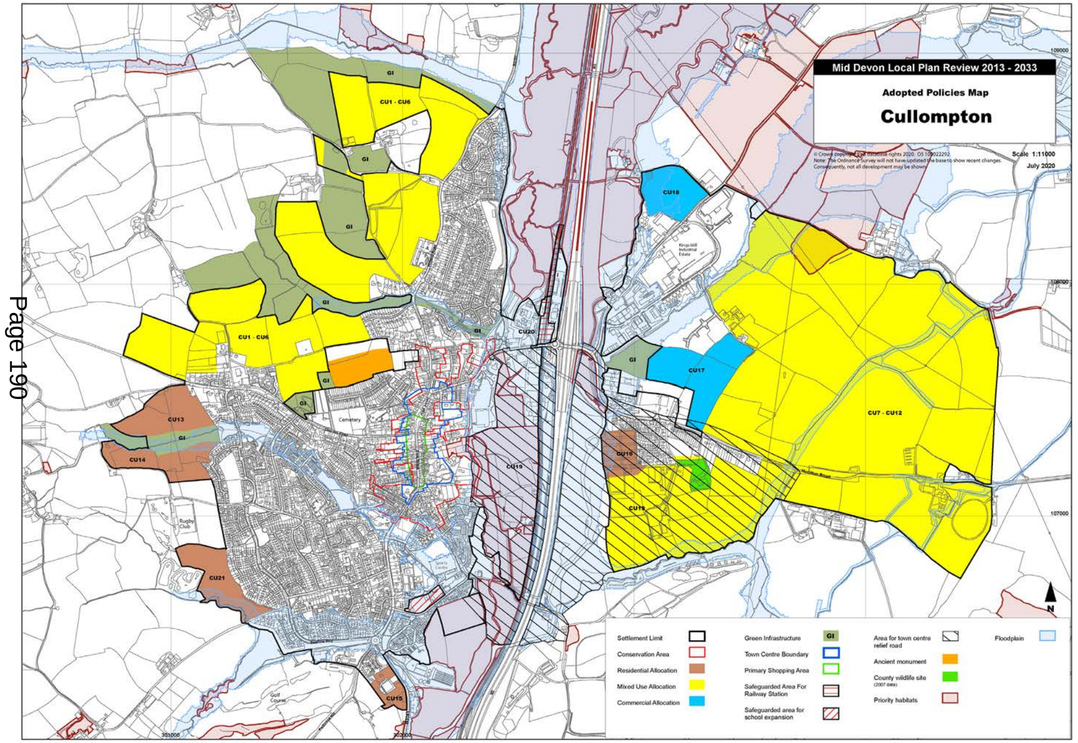
Natural Capital

Delivery and Phasing

Summary of Engagement

Parallel Work

Lessons from Elsewhere



Mid Devon Local Plan Adopted Policies Map: Cullompton

3.1 Policy Context

The Mid Devon District Council Local Plan

The Mid Devon Local Plan for the period 2013-2033 was adopted in July 2020 and forms the Development Plan for the area. The key policies from the adopted Local Plan in respect of the East Cullompton allocation are summarised below:

Policy S2 - Amount and Distribution of Development
This sets out the district's housing requirement for the plan period (2013-2033) of 7,860 dwellings. Central to the spatial strategy is the role of Cullompton in meeting the district's long-term development needs.

Policy S11 - Cullompton
This sets out a long-term vision for Cullompton to develop as a fast-growing market town with a strategic role in the hierarchy of settlements in Mid Devon.

The town will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity. This strategy will improve access to housing through urban extensions and expanded employment opportunities. There will be significant improvements to the town's infrastructure and connectivity, including the reopening of the railway station, and improved services for its population and nearby rural areas. Proposals will provide for approximately 3,930 dwellings, of which 1,100 will be affordable, and 73,500 gross square metres of commercial floor space over the plan period.

Key investment priorities include:
- Strategic mitigations to maintain highway capacity, safety, integrity, and sustainability including the M5 and local highway network;
- reopening of Cullompton Railway Station;
- Continue measures to support the implementation of the Cullompton Air Quality Action Plan;
- Manage the town centre so that economic regeneration and heritage reinforce each other;
- Provide community infrastructure such as education and enhanced open space to support new development proposals;
- Support measures to reduce flood risk within Cullompton and make provision for green infrastructure.

Policy CU7 - East Cullompton
This allocates a site of 160 hectares at East Cullompton, to the east of Junction 28 of the M5 for the development of an area of new settlement. Policy CU7 sets out a number of development requirements, covering a range of matters:
- 1,750 dwellings within the plan period and further development of at least 850 dwellings post 2033;
- 28% affordable housing to include extra care housing and at least ten pitches for gypsies and travellers, subject to viability;
- 5% of housing to be provided as serviced plots for sale to self-builders;
- 20,000 square metres commercial floorspace within the plan period and a further 12,000 post 2033, to include a care home or retirement complex, appropriately scaled retail development and other suitable uses such as offices and a hotel or leisure development;

- Provision of at least 40 hectares strategic green infrastructure;
- Provision of transport improvements to ensure safe and suitable access for all modes, including necessary capacity improvements to M5 Junction 28 and pedestrian and cycling links across the motorway to the existing town;
- Environmental protection and enhancement and noise mitigation where necessary;
- Assessment of land contamination and remediation if necessary;
- Land and facilities for community use including a new primary school to meet local needs arising;
- Contributions towards expansion of local secondary education facilities to meet needs arising;
- Carbon reduction and air quality improvements;
- Archaeological investigation and appropriate mitigation;
- An agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development; and
- Comprehensive Masterplanning of the development including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document, before any planning application is determined.

Policy CU8 – East Cullompton Transport Provision

As part of the development of East Cullompton, contributions towards or delivery of the following transport infrastructure will be provided by all new development within the site:

- Capacity improvements at Junction 28 M5 to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site;
- Provision of appropriate highway improvements on roads around the development to ensure any unacceptable traffic impacts are mitigated;
- Reopening of Cullompton Railway Station;
- Provision of a network of streets linking to the existing highway network, and appropriate mitigation to reduce impacts on the existing road network such as Honiton Road;
- Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area;
- Safe and attractive cycle and pedestrian links to and from the town centre and within the mixed use urban extension;
- Creation of safe and attractive pedestrian and cycle links between the development and the Kingsmill Industrial Estate;
- Implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts;
- Bus service enhancements within, into and out of, the mixed-use urban extension, linking to Cullompton town centre;
- Bus service enhancements between Cullompton, Exeter, Tiverton Parkway and Tiverton

Policy CU9 – East Cullompton Environmental Protection

As part of the development of East Cullompton, the following environmental protection and enhancement measures will be implemented at the expense of all new development within the site:

- Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;
- An area of 40 hectares for strategic green infrastructure, laid out and managed with an appropriate mix of public parkland, open space, landscaping and local nature reserve;
- Areas of equipped and laid out public open space, totalling 0.4 hectares of equipped children's play, 0.12 hectares for teenage

facilities, 6 hectares amenity green space, 9 hectares of parks, sports and recreation grounds, and 1.5 hectares of allotments;

- Protection and enhancement where possible of existing Public Rights of Way;
- Appropriate screening and landscaping for properties adjacent to the M5;
- Appropriate provision of a sewerage system to serve the development and a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;
- A strategic landscaping and tree planting scheme to mitigate landscape impact, protect the setting of the Blackdown Hills Area of Outstanding Natural Beauty, and enhance biodiversity and the character of development; and
- Design solutions which respect the settings of listed buildings adjoining the site.

Policy CU10 – East Cullompton Community Facilities

As part of the development of East Cullompton, the following community infrastructure will be provided at the expense of all new development within the site:

- A serviced site of 2.5ha for a new 630 place primary school, or alternatively 3ha of serviced land in two parcels of 1.1ha and 1.9ha appropriately located for the delivery of two new primary schools, at no cost to the Local Education Authority;
- A site of 2 hectares for a shopping and community centre, and the provision of a multi-purpose community building for youth, children and other community uses;
- Construction costs for a primary school capacity of at least 630 places plus additional early years provision, including the requisite land to deliver these facilities. The required primary school capacity should be delivered through the provision of either one or two schools;
- Contributions towards the expansion of secondary education facilities in the local area;
- Contributions towards the expansion or improvement of local library services
- Contribution towards sporting and leisure facilities; and
- Contributions towards a new recycling centre to serve Cullompton.

Policy CU11 – East Cullompton Carbon Reduction and Air Quality

The development of East Cullompton will be required to implement a Carbon Reduction and Low Emissions Strategy at the expense of all new development in the site. This will propose measures to minimise the overall carbon footprint of the development, making provision for sources of decentralised onsite renewable or low-carbon energy and ensure that impact of the site on air quality is acceptable, such as:

- Renewable and low carbon energy to provide a proportion of the site's energy use;
- Measures to ensure that residents, employees and businesses are encouraged to travel in the most sustainable fashion, including travel plans, information, car clubs, lift-sharing and infrastructure for low emission vehicles;
- Measures to encourage the sustainable treatment of waste;
- Measures to manage the impacts of construction;
- Offsite tree planting where sufficient cannot be accommodated onsite;
- Energy improvements to existing buildings; and
- Other measures to capture or mitigate carbon emissions and air quality impacts from development.

Policy CU12 – East Cullompton Phasing

A phasing strategy will be required for the development of East Cullompton to ensure that the development and infrastructure come forward in step, minimising the impact of development while ensuring that the development remains viable. The strategy should take account of the following requirements, variation of which will have to be carefully justified. Development shall be subject to the following:

- Provision of affordable housing will be broadly in step with the market housing;
- Provision of all serviced self-build plots after strategic highways infrastructure has been completed;
- Provision of commercial development in step with housing, at a rate of at least 1 hectare per 500 occupied dwellings;
- Provision of strategic green infrastructure broadly in step with development, with public open space provided at a rate of at least 1 hectare per 150 dwellings or phased to deliver a larger area of multi-functional public open space at a suitable stage in the development;
- Implementation of bus service improvements in step with housing development, provided in appropriate instalments;
- Capacity improvements at junction 28 M5 to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site; and
- Transfer of serviced land together with right of access for primary school(s) at no cost to the Local Education Authority prior to the first occupation of residential development, with necessary funding to construct the facilities being paid to the Local Education Authority in appropriate instalments.

Revised Mid Devon Local Plan

The Council have started work to prepare the new Local Plan. This will have regard to the latest national planning policies, practice guidance and thinking about how best to plan in the context of a national housing crisis, economic and pandemic recovery and the challenges of a climate emergency. It will also ensure Mid Devon will continue to benefit from a plan-led approach for development to meet current and future needs over a longer time period to 2043.

Consultation on the Plan Mid Devon 2023-2043 Regulation 18 Issues Paper took place from 31st January - 28th March 2022. This was the first stage in preparing the new Local Plan in which sought views about what the new Local Plan will include and how Mid Devon should be planned for in the future.

The emerging Local Plan includes the ambition for the Culm Garden Village. The Culm Garden Village proposal is one of only 14 areas initially awarded Garden Village status by the Government in January 2017. Mid Devon's expression of interest for the Garden Village identified the potential to deliver up to 5,000 sustainable new homes in a country park landscape, with jobs, community facilities and transport, all integrated with Cullompton itself. 1,750 of these homes are already planned at East Cullompton through the current adopted Local Plan for the period to 2033 and there is provision for at least another 850 new homes beyond. The development of a garden village in this location would build on the strategy of the current Local Plan, where Cullompton will be the strategic focus of new development in Mid Devon due to its accessibility, economic potential and environmental capacity.

Cullompton Neighbourhood Plan

The Cullompton Neighbourhood Plan was adopted in June 2021 and now forms part of the statutory development plan for the Cullompton area, alongside the Mid Devon Local Plan and the Devon Waste and Minerals Plan, and carries full weight for guiding planning applications submitted to the Council for determination and the decisions made on these.

The Neighbourhood Plan reflects on the proposed growth of Cullompton and in respect of the East Cullompton states:

Cullompton Town Council is happy to go along with the 'Garden Village' approach to development in east Cullompton if it helps achieve the strategic policies of the Local Plan, delivers a high-quality living environment and facilitates sustainable growth of Cullompton that will offer benefits to all the parishioners of the area. However, it is the Town Council's position that this can only be achieved if the east Cullompton growth area is conceived from the outset as an integral part of the town of Cullompton and not a separate settlement; and master-planned accordingly.

This principle of seeking to think about the existing town of Cullompton and the proposed development at East Cullompton and the wider Culm Garden Village as one place has been a key influence in developing the proposed Masterplan Framework.

SPD Stage 1

In December 2018, the Council published the East Cullompton Masterplan SPD Stage 1: Issues, Opportunities and Concepts for consultation. This is not an adopted SPD but it presented the emerging local planning policy context and the initial vision and principles for the site, before going on to summarise the masterplanning evidence base to date and the subsequent issues that have been identified. The document then proceeds to outline initial development options and opportunities for delivery of the vision and principles. A Vision & Concept document for the wider Culm Garden Village was also prepared and published for consultation alongside this Stage 1 Masterplan SPD. These documents help set the context for this SPD.

Mid Devon Design Guide

In October 2020 the Council adopted the Mid Devon Design Guide Supplementary Planning Document. The Design Guide applies to the whole of Mid Devon and is intended to raise design awareness and standards throughout the planning process.

We have had regard to the overarching design principles in this guide in preparing this SPD and setting out the principles, design guidance and requirements for new development at East Cullompton.

Devon Waste Plan

The Devon Waste Plan for the period 2011-2031 was adopted in December 2014 and forms part of the Development Plan for the area. The key policy from this plan is Policy W4: Waste Prevention. This policy looks for sustainable construction, procurement and waste management in Devon to achieve a reduction in the waste generated through all forms of development. Development at East Cullompton will need to show how sustainable construction, procurement and waste management has been considered.

3.2 Carbon Reduction Principles

Context

There is a legal requirement enshrined in the Climate Change Act (2008) to achieve net zero carbon emissions in the UK by 2050 as part of a global effort to reduce temperature rises to “well below 2°c” compared to pre-industrial levels.

This climate emergency has been acknowledged by Mid Devon District Council in 2019 and is reflected in the Interim Devon Carbon Plan (2020) which provides a roadmap for Devon to achieve net-zero by 2050, with an interim target of a 50% emissions reduction by 2030 (from 2010 levels). Further detail on the roadmap itself will be reflected in the Devon Carbon Plan which remains in preparation and is due to be finalised later in 2022.

Reflecting this context and acknowledging the impact that the built environment has on emissions, the Adopted Mid Devon Local Plan Review (2013 – 2033) embeds a requirement to minimise emissions in the delivery of future allocated development across key policies. This includes Policy S1 (Sustainable Development Priorities) and Policy S9 (Environment) alongside wider policies such as Policy DM2 (Renewable and Low Carbon Energy) and Policy DM3 (Transport and Air Quality).

From a site-specific context, Policy CU7 (part k) of the Local Plan Review makes it a requirement for the allocation at East Cullompton and the wider Culm Garden Village site to implement ‘carbon reduction’ improvements. This is further reflected in Policy CU11 which obligates the preparation of a Carbon Reduction and Low Emissions Strategy with a focus on measures to minimise the overall carbon footprint of the site.

East Cullompton Masterplan SPD

Carbon Emission Assessment Framework and Emission Sources

MDDC are currently developing a Low Carbon Affordable Housing Development Framework Assessment Tool however, there is not yet an agreed assessment framework obligated in national planning policy (e.g. NPPF) by which the relative whole-life carbon (WLC) emissions generated by new development sites can be measured in a consistent way. From a buildings perspective, the most widely accepted methodology currently used within the industry and already applied within a local policy context (e.g. Adopted London Plan) is the WLC Assessment framework. This applies standards contained within BS EN 15978: 2011 through consideration of the following building-related emission sources (typically over a 60-year period):

The WLC framework is not exhaustive and does not consider the emissions from all in-use sources (from human behaviour) such as from surface transport, waste processing or food and service consumption. No framework is currently widely applied within the industry to measure the emissions from these sources. Based on preliminary City Science research for the Royal Town Planning Institute (RTPI), these unmitigated human behavioural based emission sources are estimated to comprise around two thirds of the total life-cycle emissions (60-years assumed) of a development site.

WLC Carbon Assessment Component	Emission Sources		Typical % WLC Emissions Contribution
A1-A3 Product Stage	• A1: Raw Material Supply • A2: Transport of Materials	• A3: Manufacturing	30%
A4-A5 Construction Stage	• A4: Construction Transport	• A5: Construction Process	10%
B1-B7 Use Stage	• B1: Building Use (emissions from building components only) • B2: Maintenance of Building • B3: Repair of Building • B4: Replacement of Building Parts	• B5: Building Refurbishment • B6: Operational Energy Use (Regulated & Unregulated) • B7: Operational Water Use	55%
C1-C4 End of Life Stage	• C1: Demolition Process • C2: Transport from Demolition	• C3: Building Waste Material Processing • C4: Building Waste Materials Disposal	5%

Table: Typical Emission Sources Considered by Whole Life Carbon Assessment

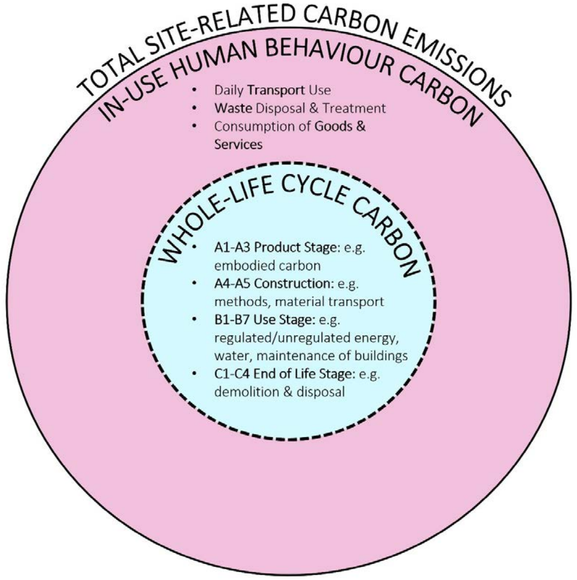
Quantification of Estimated Carbon Emissions

A Carbon Reductions and Low Emission Strategy is to be provided by developers in consultation with the Council. It should apply a comprehensive approach to estimate a 'Do Nothing' baseline for carbon emissions across the lifecycle of the site (60 years assumed). This 'Do Nothing' baseline should then be used as the basis to develop the carbon reduction targets & strategy for the site. Subject to any future national policy revisions or provisions in the Local Plan, this should comprise:

- Whole-Life Cycle Carbon Assessment Framework: consideration of potential approximate emissions across the WLC components identified in BS EN 19578:2011, incorporating both regulated and unregulated energy consumption as part of B6.
- In-Use Human-Behaviour Carbon: consideration of potential approximate emissions from in-use human behaviour considering transport, waste and consumption of goods and services.

Carbon Reduction Key Principles and Target Setting

Setting a target to reduce carbon emissions from the site should be embedded as a clear outcome across all disciplines of the planning process. Embedding this vision at the outset is critical to ensure that delivery of East Cullompton is successful in minimising its impact across all potential emission sources.

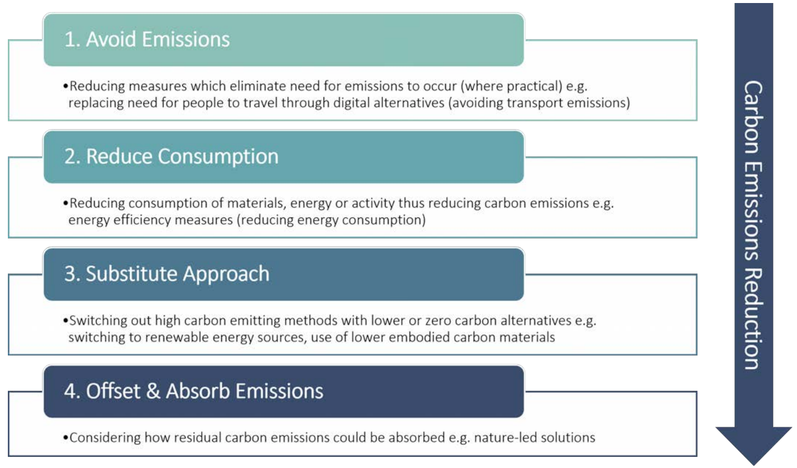


Total Lifetime Site-Related Carbon Emissions

Overarching Carbon Reduction Hierarchy

The Carbon Reductions & Low Emission Strategy in conjunction with the Masterplanning process should be underpinned by a hierarchy of core principles focused on the outcome of reducing emissions. This should be comprised of the following:

- Avoid Emissions: through measures which eliminate the need for emissions to occur entirely (where practical) such as through substituting the need for people to travel with digital alternatives (avoiding transport emissions)
- Reduce Consumption: through measures such as energy efficiency (reducing energy consumption), rationalisation of material selection in construction (reducing material use) or through embedding circular economy principles (reducing waste generation)
- Substitution: through switching out high carbon methods with lower or zero carbon alternatives such as renewable energy sources, electric vehicles, or lower carbon building material selection
- Offset & Absorb: through consideration of how residual emissions anticipated could be absorbed e.g. nature-led solutions



Carbon Reduction and Low Emissions Strategy Hierarchy

Broad Carbon Reduction Approach by Source

The following table identifies potential criteria for success for decarbonisation measures across the various carbon emission sources. This considers all sources which includes all those identified in Policy CU11 of the Mid Devon Local Plan Review.

These potential decarbonisation measures are indicative and are not exhaustive and remain subject to further testing through more detailed planning stages by developers. The Carbon Reductions and Low Emission Strategy submitted by developers should set out measures against each source.

East Cullompton Masterplan SPD

	Source	Broad Low Carbon Emission Outcome		
		Avoid Emissions	**Reduce Consumption**	**Substitute Approach**
Whole-Life Cycle Carbon Emissions (Buildings)	**Buildings (Embodied Carbon, Construction, In-Use & Demolition [A1-A5, B1-B5, C1-C4])**	✓ Ensuring the development content directly matches future needs of site users ✓ Reduce building footprints and site coverage	✓ Lightweight construction method ✓ Building materials locally produced in Devon (where appropriate) to reduce transport emissions ✓ Use of recycled / reclaimed materials	✓ Switching out high embodied carbon products (e.g. steel, aluminium, concrete) with low embodied carbon products (e.g. timber, lime render, slate) ✓ Moderate to high repurposing of building materials rather than use of composite materials ✓ Selection of standard components to reduce emissions from future maintenance of site ✓ Modern Methods of Construction
	Energy (WLC B6)		✓ Dwellings designed in accordance exemplary energy efficiency standard such as the Future Homes Standard (due to be implemented from 2025) ✓ Low energy consumption intensity for both building and user consumption such as through per-room energy control or communal access to white goods	✓ On-site renewable electricity generation including rooftop and surface photovoltaic solar panels *(electricity proportion subject to feasibility assessment)* ✓ On-site heating in buildings from renewable sources such as air-source or ground-source heat pumps *(subject to feasibility assessment)*
	Water (WLC B7)		✓ Widescale water consumption meters ✓ Water-efficient design ✓ Maximise use of rainwater and greywater throughout the site	✓ On-site water heating from renewable sources such as ground-source heat pumps ✓
In-Use Human Behaviour	**In-Use Transport**	✓ Maximise digital connectivity through ensuring full fibre broadband access ✓ Parking policies	✓ Integration of land use content with transport, including opportunities for flexible work space and hubs ✓ To demonstrate how the place it fits within ‘a 20-minute place’ with residents able to access essential local services and employment within 20 minutes via walking, cycling and shared transport	✓ Active travel routes to be fully integrated with public and shared transport networks and aligned with major trip generators ✓ Public and shared transport provision to and within the garden village to demonstrate zero tailpipe emissions ✓ Provision of electric car club for longer-distance trips ✓ Appropriately located mobility hubs including delivery hubs and shared community services
	In-Use Waste		✓ Potential for on-site hubs to support local and circular / sharing economies e.g. swap shops ✓ Potential for site-wide circular economy-based schemes for retail units e.g. reuse schemes	✓ On-site compost facilities integrated as part of community allotments for food waste ✓ Maximise recycling rates through measures such as exceeding minimum requirements for recycling bin storage space
	In-Use Consumption of Goods & Services (e.g. Food)		✓ Community growing space and allotments to in each phase of the garden village to support reduced meat consumption	

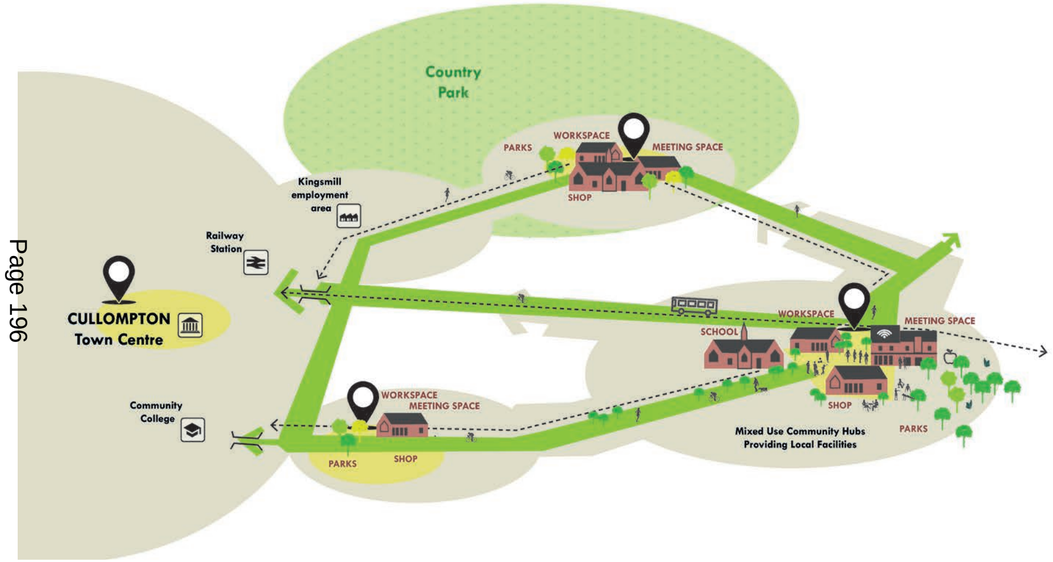


Illustration of the 20 minute place at Cullompton demonstrating the town wide and neighbourhood scale opportunities

East Cullompton Masterplan SPD

3.3 The 20 minute place

A fundamental aspect of successful placemaking and addressing critical issues such as decarbonisation is reducing the dependence on private car journeys. The proximity of Cullompton Town Centre, expanding employment areas and East Cullompton, if combined with a comprehensive mobility strategy, maximises the ability to achieve net zero carbon ambitions, address the climate emergency declaration and promote active and healthy mobility practices.

The idea of a 15 or 20 minute place is well recognised and promoted in many cities worldwide and relates to a concept which aims to create neighbourhoods where you can find most of what you need day to day within 15-20 minutes of home. While improved connections in to the rest of the region will clearly remain important, and helped by the reopening of Cullompton railway station, the allocation at East Cullompton and the wider Garden Village opportunity will be of a scale that can bring forward a range of land-uses that not only benefit the site, but also the wider area allowing people to access more services and opportunities for day to day needs. Active and shared travel interconnectivity between East Cullompton and Cullompton is essential to ensure that sustainable travel options are woven in to plans with the aim of reducing reliance on use of the car.

While the concept of the 20 minute place emerged in an urban context and Cullompton has a more rural character, the ideas are still relevant and essential to addressing the issues above. The Masterplan Framework translates the idea and applies it directly to the local context. When we refer to the 20 minute place at Cullompton this refers to both:

- A town wide scale, where Cullompton as a whole offers a broader range of local services, jobs, enhanced Town Centre, railway station and recreational opportunities and where cycling and public transport may need to be used as well as walking.
- A neighbourhood scale where walkable new communities provide local facilities such as workspaces, schools, community space, open spaces and shops as a central part of the new neighbourhoods.



Extract from the TCPA Guide on 20 Minute Neighbourhoods



Illustration of the range of benefits possible through harnessing natural systems

3.4 Natural Capital

Our environment is our life support system sustaining and providing our food, fuel, building materials, fresh air, clean water, carbon storage, and economic worth. Climate change, significant declines in biodiversity, and population growth are putting pressure on our environment.

We can capture the value of nature by harnessing natural systems and processes rather than working against them. This approach is described as nature-based solutions and the benefits of natural processes are commonly referred to as ecosystem goods and services. These comprise tangible and intangible benefits and include the production of food and timber, carbon sequestration, improved air quality, reduced storm-water runoff and the regulation of the climate.

Ecosystem goods and services provide many benefits and their value can be measured using a natural capital approach. Ecosystem goods and services are varied and closely interrelated. A single well considered intervention can result in multiple benefits. Mid Devon District Council commissioned a Natural Capital assessment of the site as part of the preparation of the Masterplan, this work helps to identify where the environment is working well, where is the best place to site new development and how we can intervene to deliver multiple benefits or minimise risk of things such as erosion or flooding. The findings and recommendations of the Assessment are incorporated in the following sections of the SPD.

3.5 Delivery and Phasing Priorities

East Cullompton is a large-scale and complex development with a long duration that will span over more than a decade, particularly so, given its potential in the future to grow into the Culm Garden Village. There is more than one site promoter and there are multiple land ownerships to consider. As development commences there will be others too who will have a strong stake in its successful outcome, including a flourishing local community of residents and businesses.

Policy CU7 is very clear about the need for a comprehensive masterplan to guide development and sets out the land use and infrastructure requirements for East Cullompton and Policy CU12 sets out the phasing requirements. The delivery mechanisms required to ensure that this sequence happens successfully and that it is viable and sustainable at every stage in its development will be the subject of further work involving all interested parties to comprise the Phasing and Delivery Strategy. Initial phasing principles are included within this SPD and planning applications will be required to demonstrate how these principles are being met.

The drivers of change we highlighted in the introduction, whether that is rapidly changing patterns of living and working or, for example, increasing support for local business, all point to the urgent need to deliver the essential ingredients of place and the right kind of infrastructure either at the same time or ideally in advance of building homes. We also need to deliver a good choice of homes with a variety of tenures and types right from the outset. The East Cullompton site offers some unique opportunities of a development of this type and scale. These include links to large employment areas at the edge of the site, the potential to improve links with the existing communities and facilities in Cullompton and the potential to utilise the diversification of existing farm clusters on site as a model and catalyst for establishing a variety of activities on the site from the outset.

Establishing “village life” early on and providing alternatives to entrenched patterns of daily out-commuting and the use of the private car for all daily activities is at the heart of the “20 minute place” concept and this must be a high priority and a key driver in the phasing and delivery strategy.

The multiple landownerships have influenced the masterplan and the way this has been described to provide an overarching structure to East Cullompton. The guiding principles and key features that we want to see in the early phases of development have also shaped the overall approach and plans for East Cullompton described in the Masterplan Framework Section. The resulting phasing principles are also contained in the Masterplan Section.



Extracts from stakeholder workshop

3.6 Summary of Engagement

During the preparation of the Stage 1 SPD extensive engagement and collaborative working took place with a number of technical stakeholders such as landscape architects, ecologists, highways officers, urban designers, flood risk and drainage specialists, education and housing officers, leisure and health professionals; as well as with community organisations and groups forming the Culm Garden Village Community Stakeholder Forum. This Forum is attended by representatives from organisations such as Cullompton Town Council, Kentisbeare Parish Council, Cullompton Neighbourhood Plan Steering Group, sports clubs, local health providers, local schools, arts groups and faith groups.

The key findings from engagement during Stage 1 have been used to inform the preparation of this SPD. These key findings include:

- Ensure the new community is integrated with Cullompton, physically and socially.
- Green buffer with Kentisbeare.
- Sense of community and well-being with sports and leisure to meet the needs of the existing and new communities – being happy where you live, active, inclusive and safe.
- Adequate and natural flood risk management and sustainable urban drainage systems.
- Good quality employment in a high quality environment to attract the right people to the right jobs – reducing out-commuting.
- Business hubs with fast broadband, links with the Exeter Science Park, highly skilled workforce and quality apprenticeships
- Focal points for gathering people together, arts, culture and faith.
- A community hub with provision for healthcare, catering for all ages.
- Central neighbourhood centre with post office, pub, church, shops, cash point, nursery, community centre – focal point of the village.
- Education provision close to Honiton Road, sports and employment.
- Easy to find your way around.
- Timely provision of infrastructure.
- Suitable mix of housing to meet demographic need, high quality, well designed and built housing, including care homes and variety of tenures.
- Innovative design and new technology with low running costs and self-sufficiency designed in.
- Flexible live-work space.
- Community ownership and stewardship of open space and facilities, open space and facilities optimised to build community cohesion; facilities well run; fair for everyone.
- Respect and respond to natural features, incorporate renewable energy, grow your own food; environmentally sensitive.
- Prioritise walking and cycling, green routes, connect north and south of Honiton Road and across M5 motorway.
- Country parks and green corridors; space for wildlife; bringing the countryside into the village; and a green perimeter trail.

Building on the engagement undertaken as part of the Stage 1 SPD for East Cullompton, engagement and collaborative working has continued to inform the preparation of the Masterplan SPD. This has primarily taken place through two workshops with the Culm Garden Village Community Stakeholder Forum, held in November 2021 and April 2022.

The first workshop explored the major contextual changes since the preparation of the Stage 1 SPD in 2018 including declaration of a climate emergency, biodiversity decline and the Environment Act, the emergence of the National Model Design Code, the increasing awareness of the role of spatial planning in addressing health

and wellbeing and the implication of the COVID pandemic.

During the workshop attendees reviewed the aspirations and priorities for East Cullompton and the wider Garden Village using the principles of the 20-minute place as a model for helping to address some of these challenges. Attendees considered what the important components of a 20-minute place at Cullompton were and how the SPD could help ensure they were provided. Key discussion points included:

- Supporting choice and flexibility in working patterns.
- Flexible community spaces that can be used for a variety of events and functions.
- Open spaces that cater for a broad range of society.
- Placing nature and open space close to homes.
- Incorporating leisure and cultural space as well as shops and schools.
- Exploring opportunities for local energy production.
- Importance of a broad range of active and sustainable mobility solutions.
- Importance of place quality that responds to existing local character.
- Incorporating temporary and flexible events space that can change as the community grows.
- Using Fordmore Farm as a useful mixed-use hub and starting point.
- Using the existing landscape as a key placemaking influence.
- Viewing East Cullompton and existing Cullompton as one place.
- One settlement with multiple neighbourhoods and centres.
- Effective connections across the M5.
- The importance of phasing to set sustainable patterns of living and establishing the quality of place.

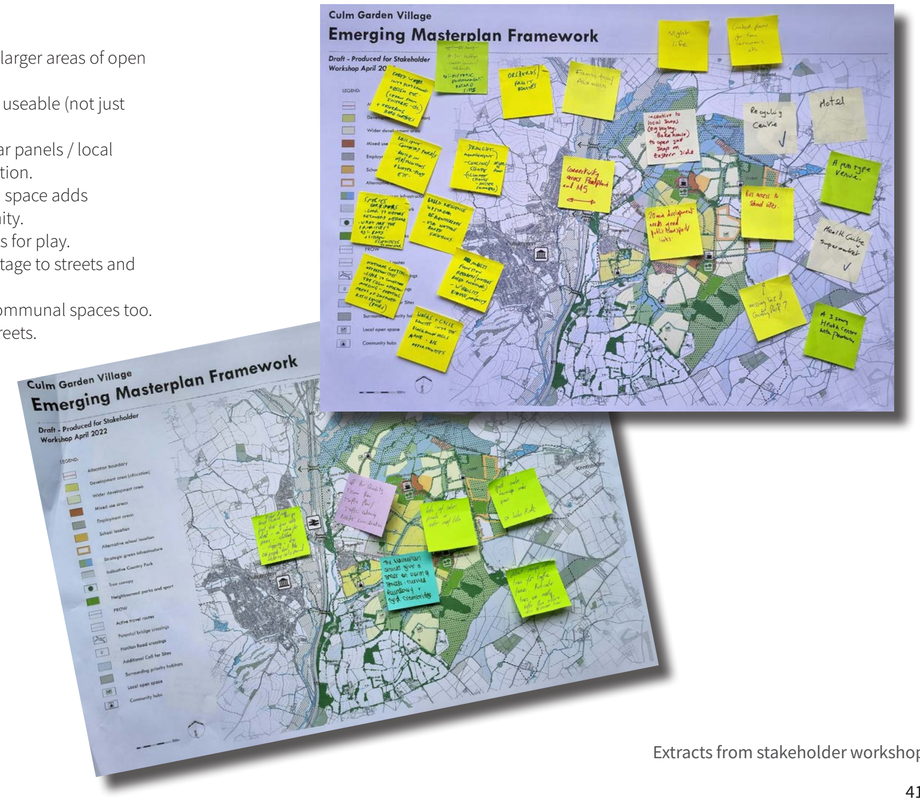
At the second workshop in April attendees were presented with emerging thoughts and a draft framework masterplan for East Cullompton and the Garden Village. Attendees were asked to review the emerging plans against the principles of a 20-minute place. Key discussion points included:

- Ensuring early delivery of successful mixed-use areas.
- The need for effective crossing of the M5.
- Importance of traffic calming and air quality.
- Incorporating water as a placemaking feature.
- Ensuring resilience through use of natural solutions and plant species selection.
- Ensuring strong connections to the Country Parks and surrounding landscape.
- How the plan can encourage sustainable travel through provision for buses, bicycles, scooters, and walking as well as limiting provision for cars and parking.
- Incorporating heritage features into the site.
- Incorporation of areas for local food production and orchards linked to other community uses.
- Incorporating a variety of retail space that can complement what is on offer in the high Street.

During the second part of the April workshop, attendees reviewed examples of other recently built schemes, looking at a range of streets, spaces and community hubs to explore what worked about them and what didn't. The objective of this second part was to help determine the placemaking priorities for East Cullompton and the Garden Village. Key discussion points included:

- Incorporating well defined front gardens to all homes.
- Avoid poorly defined spaces with no clear ownership.
- Consider a split of parking / limiting on plot parking.
- Avoid dominance of parking in community areas.
- Avoid harsh 'hard edge' where development meets open space.
- Include provision for car clubs.

- Consider maintenance of larger areas of open space. E.g. grazing.
- Ensuring open spaces are useable (not just constrained land).
- Including provision of solar panels / local renewable energy production.
- Ensure planting and open space adds biodiversity not just amenity.
- Incorporate car free streets for play.
- Ensure clear building frontage to streets and spaces.
- Incorporate small scale communal spaces too.
- Ensure trees planted in streets.



Extracts from stakeholder workshop

3.7 Parallel work

The masterplanning work for East Cullompton has been undertaken in parallel with several other work streams. These have been used to inform the proposals and to test options.

Cullompton Town Centre Masterplan

The Cullompton Town Centre Masterplan, once adopted by Mid Devon, will form the basis for the regeneration of the town; enhancing the town's economic prospects and providing a clear strategy to ensure the town meets its full potential as an attractive and thriving town post COVID-19 and into the future.

Future Mobility

A Future Mobility Strategy (April 2021) has been prepared for the site, covering a strategic review of the site, policies and best practice, and future trends; in addition to locally-led considerations such as the emerging place vision, human-centred mobility, viability and delivery.

Employment and Skills

An updated Employment and Skills Strategy was developed in parallel with the masterplan. The objective of the strategy is to support self-sufficiency and reduce out-commuting by attracting high quality jobs and setting the right conditions for inward investment. The findings of this report have been factored into the development of the Masterplan SPD.

Town Centre Relief Road

Planning permission (reference 20/00876/MFUL) was granted in January 2021 for a new Cullompton town centre relief road to relieve traffic queues at Junction 28 and in the town centre, and improve the historic environment and air quality in the town.

Feasibility testing of M5 junction improvements

Mid Devon District Council is working with Devon County Council and National Highways to progress this aspect of infrastructure.
The masterplan SPD retains flexibility on the preferred junction improvement configuration.

The Proposed Country Park

A number of workshops covering green and blue infrastructure were held with local stakeholders to capture information and continue the locally-led conversation about the potential for multi-functional green space to the north of the East Cullompton allocation. Proposals for this Country Park are being explored by MDDC but are beyond the scope of this SPD.

Ongoing work on the Connecting the Culm Project

The Connecting the Culm team have been involved in the development of the masterplan through Stakeholder workshops and through the Flooding and Drainage work relating to East Cullompton and the Garden Village.

Reopening of Cullompton Railway Station

Mid Devon District Council is committed to re-open Cullompton Train Station by 2025 as part of a wider project to improve train services in the subregion.

Flooding and Drainage

Mid Devon District Council commissioned the East Cullompton and Culm Garden Village Strategic Flood Risk Assessment and Drainage Strategy to coincide with work on the Masterplan SPD.

3.8 Lessons from Elsewhere

Place Alliance Research

In 2021 the Place Alliance launched A Housing Design Audit For England. The research systematically evaluated 142 large-scale housing-led development projects across England. Overwhelmingly the message is that the design of new housing environments in England are 'mediocre' or 'poor'.

Some of the most common failings included:

- Overly engineered highways infrastructure and poor integration of storage and car parking.
- Lack of response to local context and poor 'sense of place'.
- Poor 'walkability' due to dominance of cars and lack of local facilities.
- Failure to deliver a green and biodiverse landscape and sub standard response to the environmental challenges we face.

Enough data was collected to make regional comparisons. The research concluded that the potential exists for good design everywhere, despite this the south west scored significantly lower than the national average. These specific failings have helped to inform the priorities and recommendations of the SPD.

Garden Village review

A review of garden villages and new settlements in the south west and south coast has been undertaken as part of preparing this SPD. These projects are at various stages of delivery. The intention was not to use them as a benchmark of quality but to to identify lessons learned in masterplanning at the scale of East Cullompton.

Summary of lessons learned

- Putting Health into Place includes a useful summary of the significance and role of the built environment in improving the health of residents.
- The importance of walkable places and the challenge of establishing mixed uses to support incoming residents.
- The importance of place quality in establishing successful community and commercial hubs.
- Co-location of commercial, community space, schools and open space.
- A range of energy solutions have been developed from district heating, to anaerobic digestion to efficiency in building fabric alongside heat pumps and solar.
- Incorporation of significant areas of open space close to homes for a broad range of functions.
- The need for a clear co-ordinating plan to guide development.



East Cullompton, Mid Devon



Cranbrook, East Devon



Sherford, Plymouth/ South Hams



Poundbury, Dorset



Langarth, Cornwall



Welborne, Hampshire



East Cullompton Masterplan SPD

SECTION FOUR
UNDERSTANDING THE PLACE

Overview and Landscape

Site Context

Ecology

Natural Capital

Hydrology

Heritage

Infrastructure and Utilities

Mobility

Combined Constraints

Opportunity Plan



Aerial Photo with East Cullompton Allocation Boundary

East Cullompton Masterplan SPD

4.1 Overview and landscape context

Understanding the context and capturing the special qualities, or 'spirit', of the place is a crucial first step in developing a genuinely landscape-led Masterplan for East Cullompton.

This section of the SPD describes both the conditions within the allocated site boundary and the surrounding area to ensure the Masterplan Framework for East Cullompton is driven by a thorough understanding of the wider context.

The market town of Cullompton lies within the broad landscape context of the Devon Redlands, an extensive swathe of generally low-lying, gently rolling landscape stretching from the fringes of Exmoor in the north to the Exe Estuary and coast in the south, and from the edge of Dartmoor in the west to the Blackdown Hills in the east. The character of the area is distinguished and unified by its underlying red sandstone geology, reflected in distinctively red-tinged cob and sandstone traditional buildings, and its deep, fertile red soils which make it the agricultural heart of Devon. Rivers have created the topography that we see today and they remain as key landscape features within this area, arising within the surrounding hills and meandering through broad, open floodplains across the central part of the Redlands towards the coast.

It is the broad valley of the River Culm, running roughly NW-SE through the Redlands to join the Exe Valley, that provides the local landscape context for Cullompton and adjacent land to the east. Topography, geology and, in particular, the river and its associated watercourses and drainage characteristics have shaped patterns of settlement and land use in this area and continue to have a profound influence on local character and sense of place.

The Culm Valley is strongly defined to the west by the distinctively hummocky rolling hills that frame the town of Cullompton lying at their foot. The town's historic core originated along a N-S strip of relatively level ground just above the valley floor, contained between the physical constraints of rising landform to the west and the braided channels of the R. Culm and floodplain to the east. The western river channel formed the town's Mill Leat and is part of an integrated system of water courses (river, tributaries, channels and culverts) that have been fundamentally important to Cullompton's historic development - influencing its location, supplying water to its inhabitants and powering its mills and industries. Indeed, part of its name is thought to be derived from the Celtic cwlwn ('looped' or 'winding' river). Water continues to be a highly significant feature of Cullompton and a key part of its identity - in addition to the river/valley-side setting, there are streams, leats, culverted water supplies or the river itself, encroaching on or running through most parts of the town.

Eastwards from the town, the valley opens out into a wide low-lying and essentially flat landscape, punctuated only by localised low ridgelines and subtle undulations (e.g. around Upton and north of Stoneyford) before meeting the more distinctively rolling foothills of the Blackdowns on its far eastern side. Water is a fundamental and unifying element of this valley floor landscape, comprising a dense network of watercourses and features that include the channels of the River Culm and its tributary the River Ken; an ancient leat originating from the



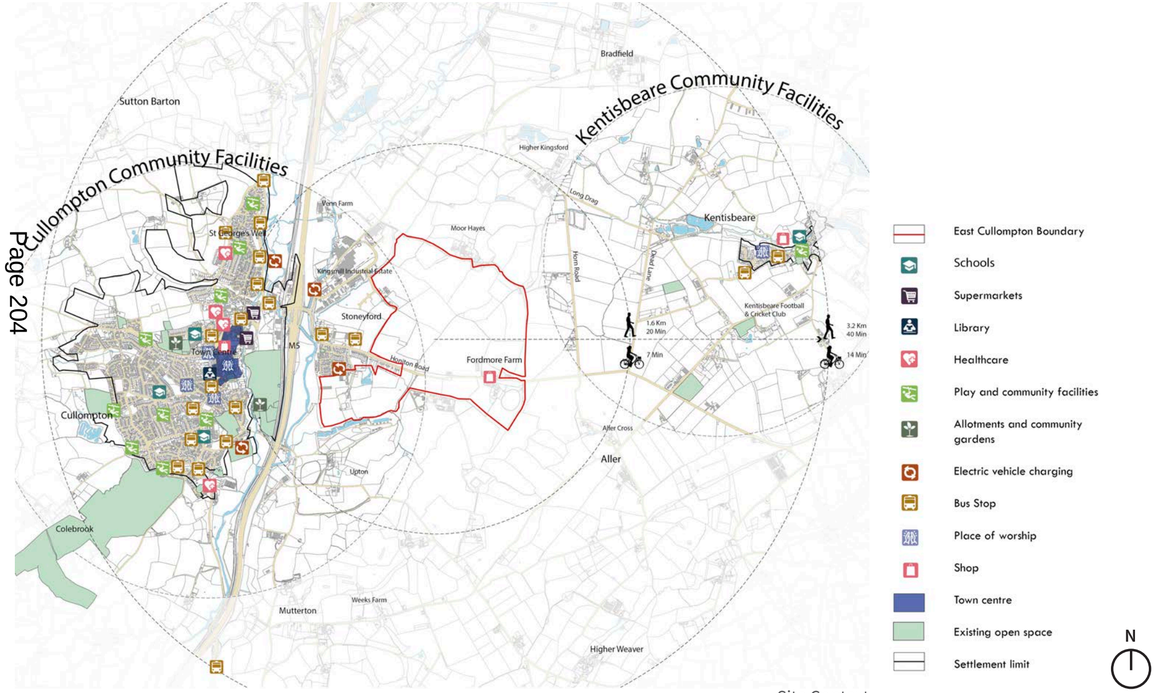
Settlements and Landform

12th century (providing a supply of water to farmsteads between Goodiford and Newland); historic fords and weirs; numerous streams and drains; and scattered farm ponds, fishing lakes and reservoirs, some created by former sand and gravel extraction. Aside from the river, these features are not especially visually prominent but the 'watery' nature of the landscape has nonetheless been responsible for the sparse pattern of farmsteads, clustered hamlets and small linear villages (e.g. Kentisbeare) typically located on slightly better drained ground but still strongly associated with natural and man-made watercourses and features.

Although historically a barrier to the eastern expansion of Cullompton, the drainage network of the River Culm is also a fundamental connecting element that links the town with its eastern landscape setting and has influenced the siting of historic mills, bridges, culverts and other structures and access routes within the landscape. This physical and perceptual connection between the town and land to the east is vital to the spirit of both 'places' but has been progressively obscured by the development of the motorway and rail corridor along this side of the valley floor and needs to be re-established.

The rural road network within the valley floor is sparse and follows local topography: straight, more open roads (droves) characterise the flatter valley floor and ridgelines, while winding, enclosed lanes and sunken 'holloways' are typical of the more strongly undulating land further to the east (e.g. around Kentisbeare). Particularly distinctive are the dead straight early 19th century 'new' roads of Dead Lane and Horn Road and the highly rectilinear pattern of fields that lies between them.

Although not heavily wooded, and despite some hedgerow removal, the farmed landscape retains a well-treed character that contributes positively to its sense of place. Key features include the strong structure of mature hedgerows and trees (particularly mature oaks) that line field boundaries, roads and watercourses right across the area but particularly to the south of Honiton Road, and surviving areas of woodland on elevated slopes (e.g. at Aller Wood and Upton). Orchards were once a frequent feature of this landscape but only a few remnants survive in areas further to the east.



Site Context

4.2 Site context

The estimated population of Cullompton in 2020 (ONS) was 11,633, and over the period of the last 20 years the population has increased by 19.5%. Population growth has been far higher than that observed across Mid Devon as a whole. The Local Plan describes how Cullompton will continue to develop as a fast growing market town with a strategic role in the hierarchy of settlements in Mid Devon. The town will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity.

The Employment and Skills Strategy commissioned in parallel to this SPD includes a socio-economic description of Mid Devon and Cullompton. The Strategy summarises that it would be expected that the incoming population would see some similar characteristics to the District and Cullompton populations. It would be expected that this would be a working population, with high levels of economic activity and dual-income households. The age profile is likely be younger than the District as a whole, with younger adults and children, including high proportions of pre-school and school age children. However, the ageing population trend is likely to be exhibited throughout the District in coming years and this would be seen within the development. This would have implications for the mix of housing and services that should be provided within East Cullompton, as well as the availability of labour that would be expected.

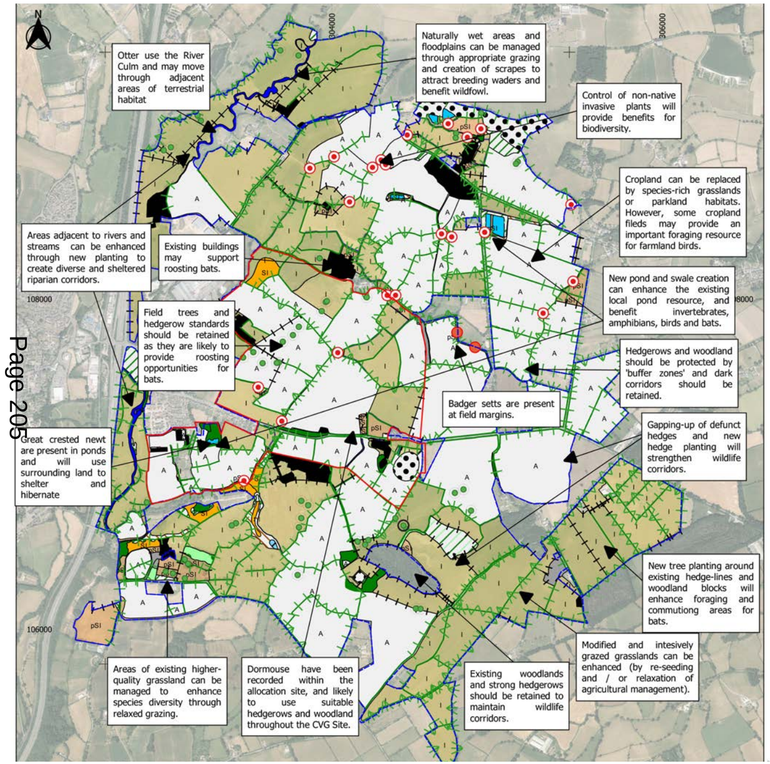
The Strategy also identifies that this community has high levels of working age people and growth in employment, particularly in arts, business administration and transport. While Mid Devon itself is the largest destination of employment for working residents of the District, significant out-commuting locations are Exeter, East Devon and Taunton Deane.

The Local Plan describes how the major growth of the town will provide the opportunity to revitalise the town centre through additional investment and transport improvements. The Local Plan also describes how future employment provision is expected grow and be centred around the Kingsmill industrial estate and within the adjoining urban extension at East Cullompton.

The growth strategy set out in the Local Plan is based on ensuring East cullompton is planned as an integral part of Cullompton. This is a key objective that is supported through other major influences explored through this SPD. The concept of the 20 minute place explored in this SPD is applied to Cullompton as whole. This means that East Cullompton should be planned in a way that supports the wider functions of the town, ensuring that as Cullompton grows it becomes more resilient with a strong local economy to support a growing working age population and to help reduce out-commuting.

This is important context for the SPD Masterplan and means that attractive, sustainable and active travel connections to the Town Centre, employment areas , proposed station, schools and key open spaces and facilities are essential. It also informs decisions on land use planning at East Cullompton, ensuring that new commercial areas can complement the Town Centre offer and that employment areas are planned in a way that is accessible to all parts of Cullompton.

Surrounding villages such as Kentisbeare and Willand can benefit from the successful expansion of Cullompton too through improved connectivity to jobs and services. However, there has been a clear desire expressed through local consultation that these villages remain clearly separate from Cullompton in terms of identity and village setting.



Ecology Constraints and Opportunities Plan

East Cullompton Masterplan SPD

4.3 Ecology

Further ecology work was commissioned by Mid Devon District Council in parallel to the masterplanning work. This work included a desk study to collate existing ecological information for the site, a walkover survey to record the habitats within the site, a summary of opportunities and constraints and an indicative biodiversity net gain assessment using the Defra Metric 3.0. The ecology surveys were also conducted on the surrounding area to understand habitat connectivity, explore potential opportunities for biodiversity net gain and to inform the natural capital opportunity mapping undertaken as part of the preparation of the SPD.

Habitats

The land use within the Site is predominantly agricultural, comprising arable land (crops, stubble, fallow, ploughed fields and grass/grass-clover leys), along with heavily improved, rye-grass Lolium perenne dominated grassland. There are a few fields of poor semi-improved grassland, but more semi-natural habitat is limited in extent and mostly concentrated at the south-west of the Site, where there are patches of habitat and habitat mosaics of semi-improved neutral grassland, swamp, tall ruderal vegetation and bramble scrub.

There are occasional patches of woodland across the Site comprising broadleaved semi-natural and plantation, mixed semi-natural and plantation woodlands, and a single small patch of conifer woodland. The woodlands include the Section 41 (NERC) habitats of principal importance (HPI) of lowland mixed deciduous woodland and wet woodland. There are occasional scattered mature trees across the Site, nearly all pedunculate oak Quercus robur species.

Hedgerows are a strong feature of the Site, with the majority located on an earth bank, and many also having an adjacent ditch. A large number are classified as 'Hedgerow with trees', containing tree standards, at varying frequencies, along the length. The hedgerows are mostly managed by flailing to a box-shape, although some have been unmanaged for several years and are now outgrown hedgerows or lines of trees and scrub. Many of the hedgerows and lines of trees contain species in the ground flora that are listed in the Hedgerow Regulations 1997, including bluebell Hyacinthoides non-scripta. The majority of the hedgerows are moderately species rich, assessed as containing an average of 3-4 woody species at frequency of occasional or higher; some hedgerows contain an average of 5 or more species at sufficient frequency and are classified as species rich hedgerows.

Standing and flowing water within the Site comprises several ponds, the majority of which are constructed ornamental or recreation features, and flowing water including the River Culm and several streams and ditches across the Site.

Small areas of habitat within the Site include tall ruderal vegetation, marshy grassland, swamp, and patches of scrub.

Several locations, particularly in the northern half of the Site, contain invasive non-native plant species as listed on Schedule 9 of the Wildlife and Countryside Act, 1981 (amended). The majority of the locations contain populations of Himalayan balsam Impatiens glandulifera, however there is one location with a small population of Japanese knotweed Reynoutria japonica, and one location with a rhododendron bush Rhododendron ponticum.

There are opportunities to enhance habitats within the Allocation Area and wider Site through change of use and relaxation of current land management.

Species

The Site supports several protected and notable species, and consideration of these and the habitats that support them will be required. The key considerations are set out below.

Bats

The Allocation Area contains several buildings, in addition to scattered mature trees and hedgerow standards. It should be assumed that bats roost within existing buildings and trees within the Allocation Area and that appropriate mitigation and compensation for their loss will need to be built into proposals. New tree planting to provide enhanced foraging opportunities, and integration of bat roost boxes in new builds should be considered to enhance the Site for bats.

Bats also use hedgerows and woodland for commuting, and these 'corridors' should be kept dark. Final proposals should include considerate lighting plans to retain dark corridors for bats. Hedgerow removal should be minimised and will need to be compensated for through new planting to retain connectivity and satisfy the requirements of biodiversity net gain.

Badger

Badger setts have been recorded within the Allocation Area. Therefore, 'wildlife corridors' alongside hedgerows and woodland should be retained to allow continued dispersal of badger and other mammals, such as hedgehog and brown hare. Providing buffers from existing field boundaries will also reduce the risk of damaging or destroying an active sett.

Dormouse

Dormouse has been recorded within the Allocation Area, and the network of hedges and woodland throughout the Site provide suitable habitat for this species. Loss of hedgerows and woodland should be avoided as far as possible, with suitable buffers provided from built development to reduce possible disturbance effects. Supplementary planting within existing hedgerows, relaxing hedgerow management, new hedgerow planting, and softening woodland edges with new tree and scrub planting will benefit this species.

Great Crested Newt

The Allocation Area is within a great crested newt consultation zone. These consultation zones were created in order to help Local Planning Authorities, developers, and consultants identify where planning applications may need to consider the potential impacts of a development on great crested newt populations. Great crested newt have been recorded in a pond within the Allocation Area. Proposals should demonstrate that the availability of suitable terrestrial habitat for great crested newt will not be significantly reduced, and will not adversely affect the local population. This will necessarily require retention of the ponds and surrounding vegetation, as well as wider woody habitats and dispersal corridors. Creation of additional ponds and hibernacula with access to a retained hedge network should be part of the design.

Designated Sites

There are no statutory designated sites within 2 km of the Allocation Area. There are thirteen non-statutory designated sites within 500 m of the CGV Site. Of these sites, one is within the Allocation Area (East Culm House UWS), and five are within the CGV Site (Willand – Aller Wood CWS, Aller Wood (West) UWS, Weeks Farm Orchard CWS, Knights Wood CWS / PAWS, Cullompton Marsh UWS, and Sherwoods UWS). Policy DM28 of the Mid Devon Local Plan states that: "development proposals adversely affecting a County Wildlife Site [or other non-statutory site] will be considered on a case-by-case basis, according to the amount of information available about the site and its significance, relative to the type, scale and benefits of the development being proposed." and "Planning permission will be granted only when:

- The benefit of and need for the development clearly outweigh the direct and indirect impact to the protected site and the ecosystem services it provides;
- The development could not be located in an alternative, less harmful location; and
- Appropriate mitigation measures have been put in place. Where mitigation measures are not possible compensatory measures in some cases may be considered appropriate."

Designation*	Site Name	Location (OSGR)	Area (ha)	Description
CWS	Knight's Wood	ST023055	4.7	Ancient semi-natural woodland partly replanted with conifers
CWS	Aller Wood	ST045064	9.9	Plantation on ancient woodland site, wet in areas
CWS	Weekes Farm Orchard	ST032053	1	Traditional ridge and furrow orchard stocked with traditional varieties including cider apple, pear, plum and cherry. Approximately 30 mature trees.
OSWI	Peverstone Embankment	ST022052	5.3	Unimproved neutral grassland with scrub and areas of conifers
OSWI	Maddock's Farm	ST052066	1.9	Mixed plantation with a pond
UWS	Aller Wood (West)	ST041064	1.3	Broadleaved woodland
UWS	East Culm House	ST032071	0.9	Pond with amphibian interest
UWS	Willand - Cullompton Marsh	ST027096	261.7	Possible floodplain grazing marsh
UWS	Sherwoods (E)	ST036053	2.3	Orchard
UWS	Cullompton - Hele Marsh	ST016045	161.1	Possible floodplain grazing marsh
PAWS	KNIGHTS WOOD	ST023054	3.8	Ancient & Semi-Natural Woodland
		ST044063	6.1	Ancient Replanted Woodland
		ST047065	3.8	Ancient Replanted Woodland

*CWS: County Wildlife Site; OSWI: Other Sites of Wildlife Interest; UWS: Unconfirmed Wildlife Sites; PAWS: Possible Ancient Woodland Sites.

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4.4 Natural Capital

Introduction

Our environment is our life support system sustaining and providing our food, fuel, building materials, fresh air, clean water, and carbon storage. Climate change, significant declines in biodiversity, and population growth are all putting pressure on our environment. This section sets out the Natural Capital Assessment undertaken to inform the Masterplan. It explores where the environment is working well, where is the best place to site new development and how we can intervene to deliver multiple benefits and minimise risk of things such as erosion or flooding through nature based solutions.

The mapping is based on key natural aspects of the land i.e. the habitats, the soil and geology, the land form and hydrology. The mapping covers a wider area than just the East Cullompton allocation boundary to explore landscape and biodiversity net gain opportunities in the surrounding area potentially associated with the Country Park or Garden Village area. The findings and recommendations of the Assessment are incorporated in the East Cullompton Masterplan Framework.

Carbon Storage

Considering ecosystem goods and services, and the natural capital they provide, allows us to understand how the land is currently storing carbon and supporting carbon sequestration. These considerations play a significant role in helping us to reach carbon targets towards net zero. The data modelled here allows us to create a carbon budget showing how much each area of land in the Masterplan area is storing carbon, in tons per hectare. From this, we can understand what needs to be re-created, or restored, in order to reach that net zero target and help offsite carbon elsewhere.

The Carbon Storage Plan illustrates the current estimated Carbon storage, in tonnes per hectare. The areas of woodland are the best at storing carbon, and that the hedgerows are also prominent.

Currently, the total carbon stored on the site is estimated to be:

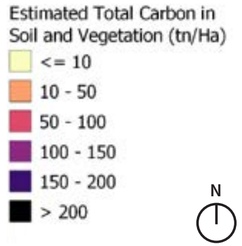
Allocation area	2,430 tonnes
Wider Garden Village	13,870 tonnes
Total Carbon stored	16,300 tonnes

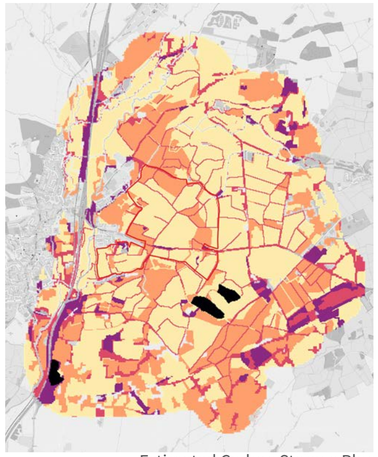
The existing habitats that have a high carbon storage potential (e.g., woodlands and hedgerows) should be kept in place and opportunities for restoring and converting relatively low carbon storage habitats into better opportunities should be explored.

For example, hedges that have been in place for centuries have very high carbon stores below ground. Minimising disruption around hedgerows and storing any removed soil as carefully as possible, will be important in maintaining carbon neutrality with existing habitats.

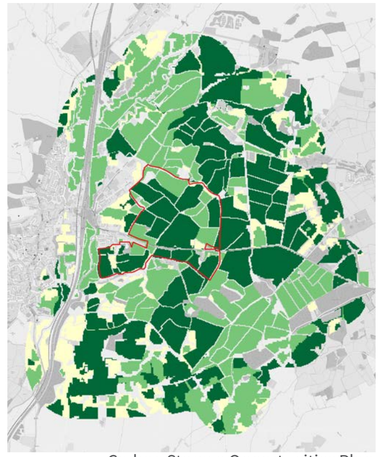
Currently, large areas of the site are arable, which, during harvests, removes a lot of the vegetation carbon, and releases the soil carbon. Establishing new areas of broadleaf woodland, wetland, and grassland habitats, preferably with native species, will help increase the carbon sequestration of the area, and keep it locked up in the soil as well.

The Carbon Storage Opportunities plan illustrates the potential opportunity for increasing Carbon storage, from low (yellow-green) to high (dark green).





Estimated Carbon Storage Plan



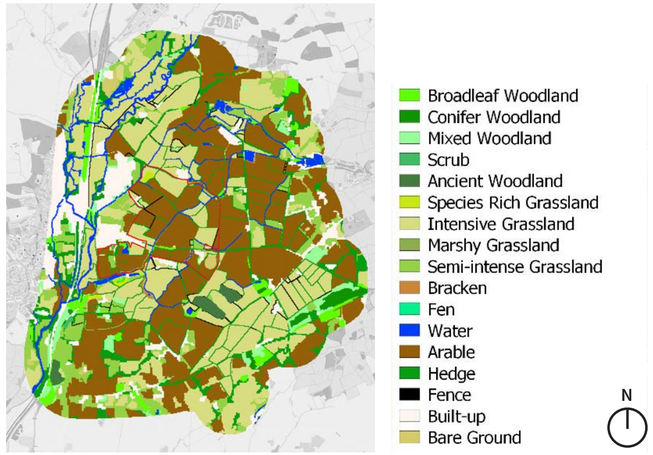
Carbon Storage Opportunities Plan

Natural Habitats and their Importance

Natural habitats are key for biodiversity as they tend to have a fully functioning ecosystem. These are made up of multiple parts, and provide the area with a strong resilience against climate change, as well as supporting a wide range of species; even those generally less common.

The bigger the block of habitat the more robust it to change, as it has a greater amount of genetic material to share. For example, a small woodland might contain only one nest of dormice, but a larger woodland block might contain a few. The spatial relationship between these blocks of habitats is also important.

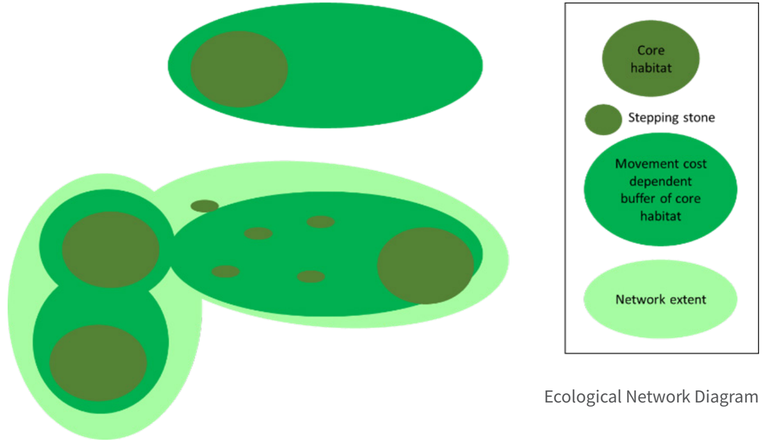
The nearer the blocks of habitats are together, the more chance they have of sharing the genetic material. Following on from earlier, even if a small woodland only has one nest of dormice, but is close to another small woodland with only one nest, there is a chance that the two can share their genetic material; particularly if the woodlands are connected by a hedgerow. Where habitats are close enough to share these resources is called an ecological network.



Habitat Class Plan

The Ecological Network Diagram diagram illustrates this concept. The dark green is the main habitat area, such as a woodland. These can be large (often called a core habitat), or small (termed a 'stepping-stone'). The lighter green areas illustrate the ecological network that facilitates the movement between the core and stepping stone habitats.

The Habitat Class Plan shows the habitats within the site, and the way they relate to those on the outside of the site. Some particularly important features for biodiversity are the ancient blocks of woodland, the more species rich grasslands and marshy grasslands, and the hedges and the trees.



Ecological Network Diagram

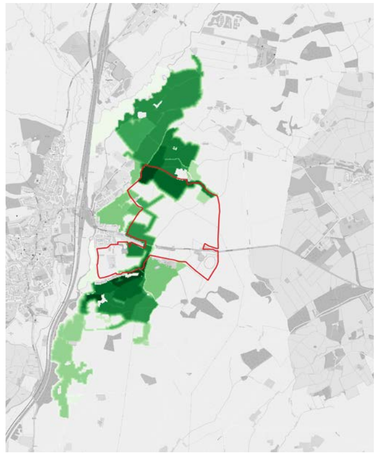
Habitat Networks

The following diagrams show how the existing habitats can support biodiversity when retained, and also where establishing new habitats on site will significantly enhance the biodiversity. Using this information allows the creation of a mixed landscape with the habitats which would work best in each space, and support cultural needs.

Grassland Features

The Grassland Habitats Plan shows the current ecological network of the grassland habitats, these areas have the best grassland connectivity. It is recommended that as much of the existing grassland network be left intact as possible and connectivity improved.

The Grassland Opportunity plan shows the most opportune locations for expanding the ecological network of the grassland habitats. Enhancing these areas with additional planting of native grassland species within the existing high connectivity areas, will assist biodiversity and maximise carbon capture.



Grassland Habitats



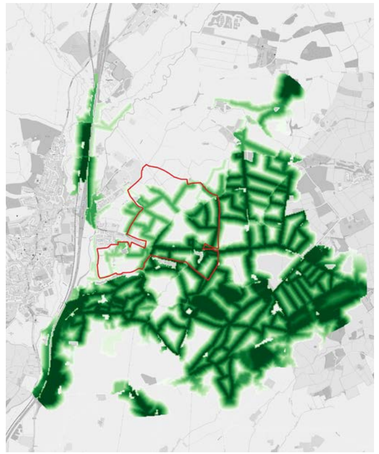
Grassland Opportunities

East Cullompton Masterplan SPD

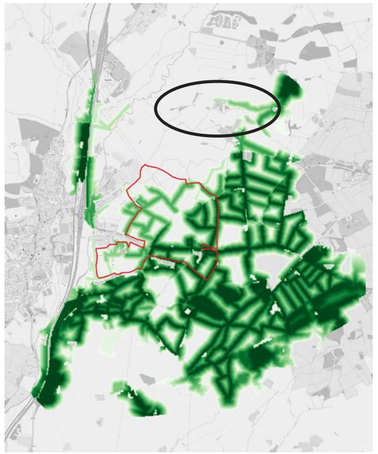
Woodland Features

The Woodland Habitat Plan shows the current ecological network of the woodland habitats, the areas to the south east have the best woodland connectivity. There is an extensive hedgerow network that connects large stands of woodland across the area. It is recommended that as much of the existing woodland network be left intact as possible.

The Woodland Opportunities plan shows the area that, if established with native woodland species, would provide the greatest impact for the woodland network in the area; making it bigger, better, and more joined up. Woodland features here would link the woodlands around Kingsmill to those around Bradfield. There is a synergy here with grassland and wetland networks, so woodland pasture, or marshy grassland would be beneficial.



Woodland Habitats



Woodland Opportunities

East Cullompton Masterplan SPD

Wetland Features

The Wetland Habitat plan shows the current ecological network of the wetland habitats, the areas that have the best wetland connectivity are highlighted with circles. There is an extensive river network that connects a number of large water bodies and ponds throughout the site.

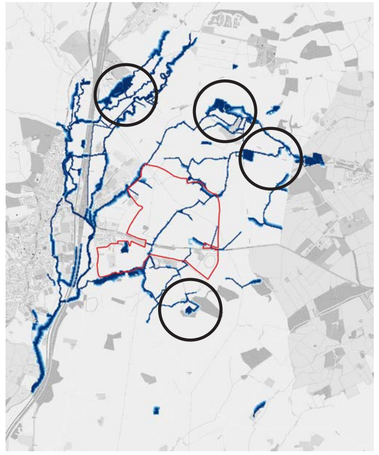
The Wetland Opportunity plan shows the most opportune locations for expanding the ecological network of the wetland habitats.

Generally speaking, the vast majority of the area is an opportunity for new wetland features. Establishment / enhancement of wetland features in the northern region would help make the existing network bigger, better, and more joined up, whilst in the south would help in establishing new corridors.

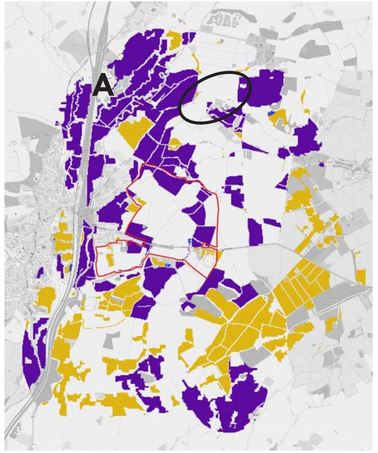
The area marked A is especially good for establishing wetland adjacent to existing wetland habitats, as part of a potential Country Park. There is a synergy here with a potential for woodland creation, and also grassland creation as well. This means that wet woodland or wet grassland features would benefit these networks as well.

The wider area to the north east of Venn Farm is currently located in a region that is great for establishing wetland features, which are also outside of the current network. Wetland features here would mean the network would be larger and more intact.

The Wetland Opportunities plan highlights an area north of Moorhayes that, if established with native wetland species, would provide the greatest impact for the wetland network in the area; making it bigger, better, and more joined up. If this area includes wetland features they would link the wetlands around Kingsmill to those around Higher Kingsford. There is a synergy here also with a potential for woodland creation, and also grassland creation as well. This means that wet woodland or wet grassland features would benefit these networks as well.



Wetland Habitats

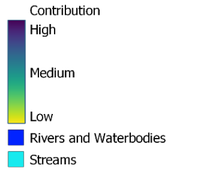


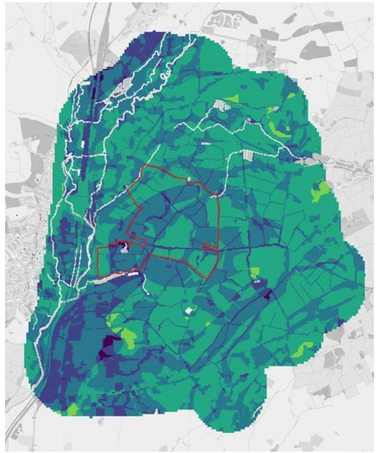
Wetland Opportunities

Natural Flood Management

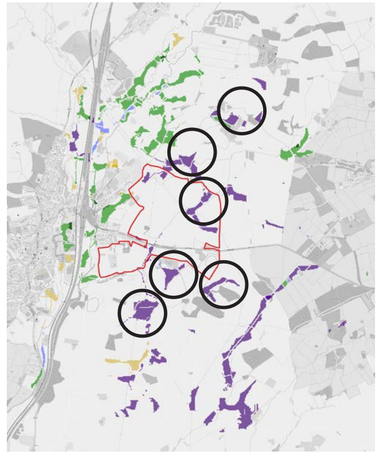
The Natural Flood Management Plan shows the combinations of soil and vegetation that provide a high degree of water infiltration and storage in the soil. The more water that infiltrates the soil, the slower the flood peaks are in reaching the river, helping to mitigate flooding events. Areas with a higher contribution could be factored into future plans for the site.

The establishment of a wetland would allow for storage of water and lengthening time for water to reach the watercourses, helping reduce the height of the flooding. The best way to help slow water down and prevent flooding is to plant native species of deciduous trees. The Natural Flood Management Opportunities plan shows the areas where tree planting will benefit natural flood management and biodiversity of the area.





Natural Flood Management Plan



Natural Flood Management Opportunities

East Cullompton Masterplan SPD

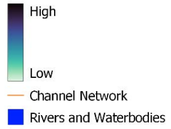
Water Quality

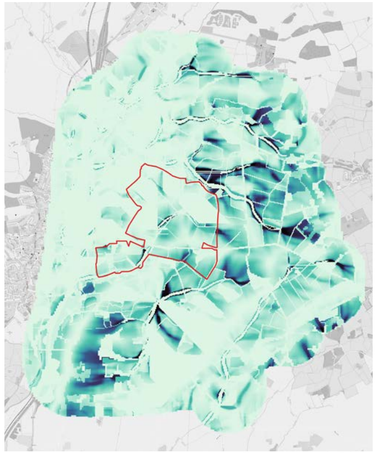
Water quality in the rural environment depends on the land use and pollutants, such as fertilisers and herbicides, blown or running off fields after rain. Another influence is soil particles from nearby fields washing into the streams — these particles tend to carry phosphorus directly into streams.

The Erosion Risk Plan shows the current erosion potential of the area. This is a useful resource to consider when planning soil management, in order to identify areas which should be permanently vegetated to prevent further erosion and help prevent pollution.

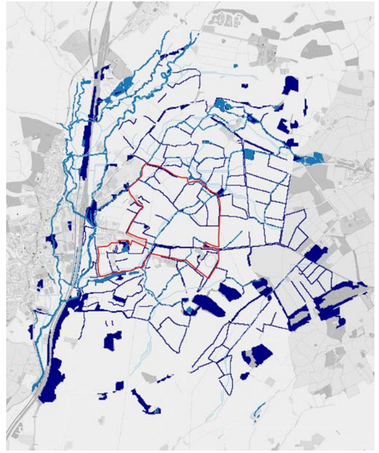
The Water Quality Contributions Plan shows the current features that help prevent water pollution by breaking the flow pathways to the river (in pink). These are predominantly made up of woodland and hedgerow features. Keeping as many of these features intact as possible would help mitigate pollution after development.

The Water Quality Opportunities Plan shows the most opportune locations marked 'A' for improving the water quality across the area.





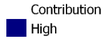
Erosion Risk Plan

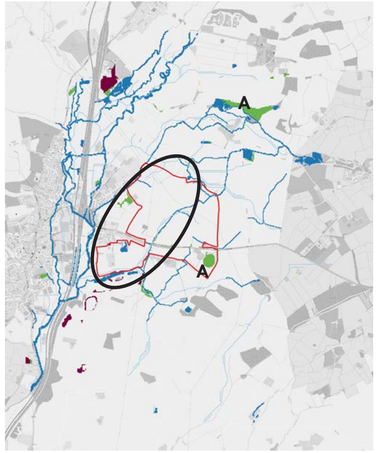


Water Quality Contribution Plan

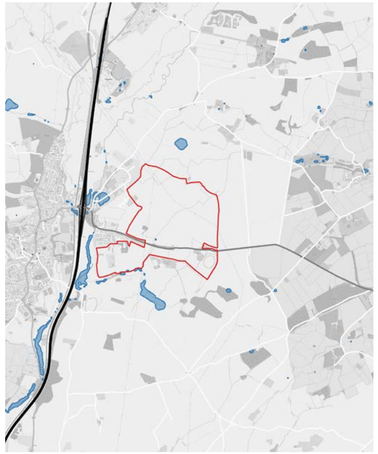
Enhancing these areas with additional planting of native species of hedgerow and woodland would help break the connections between the land and the water courses.

The area to the south marked with a circle is also a potential opportunity due to the optimal soil conditions, and would be a good place to establish open spaces with native habitats and sustainable drainage systems.





Water Quality Opportunities



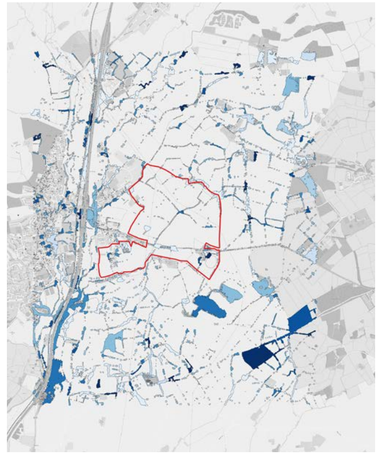
Air Quality Risks Plan

Air Quality

Most of the built area of Cullompton is declared as an air quality management area. The Council will continue to set out actions to improve air quality. Natural capital mapping can help by looking for risks and opportunities associated with topography and vegetation to managing air quality. In developing and siting roads, it is useful to consider where air could pool, as these may develop pollution levels higher than normal. The Air Quality Risks Plan shows these areas in blue; these should be avoided for larger transport routes during development.

Air quality is the largest environmental health risk in the UK. It shortens lives and contributes to chronic illness. Increased traffic is likely to increase vehicular emissions, which may impact on Air Quality. Although air quality assessments have been carried out, they will need to be monitored at regular intervals through the construction phases and afterwards.

Higher Risk Area



Urban Cooling Plan

Cooling

Large trees cool the air beneath them and the surrounding areas, with the larger the canopy providing a better cooling effect. Where works are planned to remove these trees, the top soil from underneath should be used as a separate resource for planting and establishing grassland or woodland features. This is because they are likely to have a well-developed seed bank of native species, which will be able to form a ground flora quickly and help establish their respective ecosystem services in as short a time as possible.

They can also be considered a carbon resource. Therefore, treating the trees and hedges, and the surrounding metre of soil, as a separate resource with its own management plan is a great way of minimising loss, and maximising their restoration potential.

The Urban Cooling Plan shows the trees with large canopies which, if incorporated into the Masterplan, could provide some urban cooling, as well as retaining biodiversity and carbon storage.



Flood Map for Planning Flood Zone 2 with SFRA Q1000 model results

4.5 Flooding

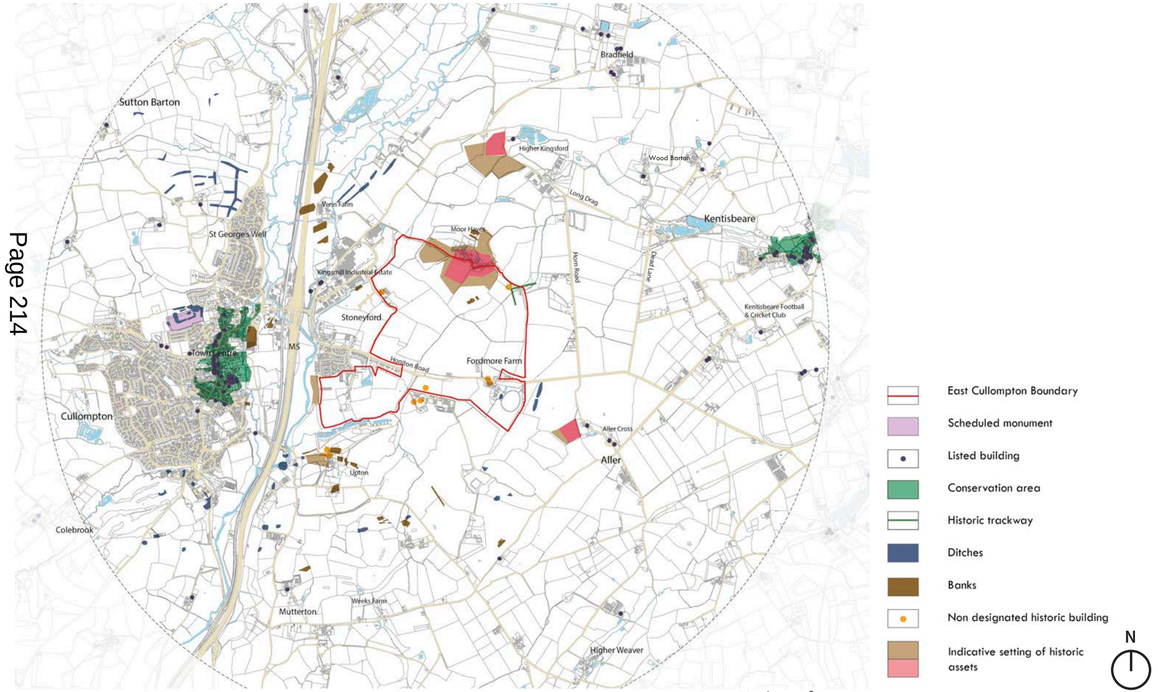
There are several drainage channels that flow through the site. The River Ken is the main watercourse and classified as an Ordinary Watercourse. The River Ken flows from east to west to the north of the allocation area, before flowing southwest where it has its confluence with the River Culm (a Main River) at Honiton Road, A373. There are a number of bifurcations of this watercourse. The first is in the area around the Goodiford Mill area, with the secondary channel flowing down towards Long Drag, where it splits again. One drain flowing south, with the other running alongside Long Drag before flowing southwest. After Horn Road, part of this drainage channel flows west and re-joins the main River Ken, with the remaining drainage channel continuing southwest and joining the River Culm by Old Hill.

The flood risk from the River Ken and the associated drainage ditches is presented by the Environment Agency via the Flood Map for Planning. This shows that the River Ken has a wide floodplain, with areas where the watercourse has become perched, i.e. the watercourse is not in line with the natural valley bottom. There is then much narrower floodplain associated with the drainage channels.

Further, more detailed flood modelling has been undertaken to better understand flood risk in the area. The more detailed flood modelling has been undertaken for 1 in 5, 30, 50, 100 and 1,000 year period events, along with climate change testing for the 1 in 100 year event. This helps to show the flood risk from more frequent events, up to extreme events. The preliminary results from the modelling work generally agree with the Flood Map for Planning, however with the level of flooding reduced, particularly in the wider floodplain areas of the main River Ken channel. This suggests that the current Flood Map for Planning may be overestimating the flood risk slightly through this area, particularly on the edges of the floodplain.

For the drainage channels through the allocation area and wider Garden Village opportunity area the flood zones and the model results are in close agreement. There are some locations where the modelling is showing some additional / wider areas of flooding, however this can be managed as part of the development via formalising and improving the drainage ditches through the area.

The more detailed flood modelling was also utilised to test a number of interventions to try and help reduce the downstream flood risk. Generally, the options had minimal impact on the wider flood risk. This work is ongoing and will be discussed further as part of the Strategic Flood Risk Assessment, to ensure that opportunities for flood risk improvements are considered further.



Heritage features

4.6 Heritage

There are no listed buildings within the East Cullompton allocation boundary but there are two Grade II farmhouses with five associated curtilage listed buildings situated immediately to the north, namely:

- Upper Moorhayes Farmhouse including front garden wall;
- Lower Moorhayes.

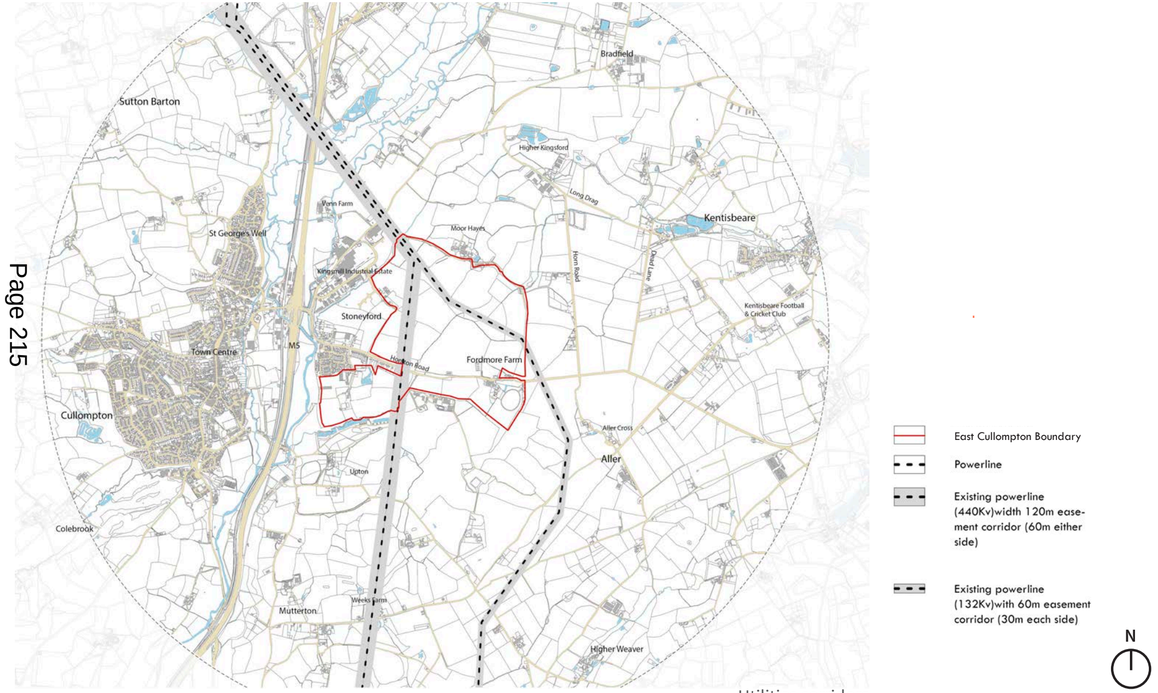
An indication of where development should be planned to protect the setting of these farmhouses is shown on the heritage plan. Where development does take place in the vicinity, particular attention and care will need to be taken to its layout, detailing and materials.

There are other historic buildings and features, some of which are non-designated heritage assets at Newlands Farm, Week Farm and East Culme House within the site together with a linhay and historic trackway in the north-east and a short stretch near Week Farm. Buildings associated with Bathill and Aller Barton lie due south of the site. Further afield there are a number of listed buildings at Maddocks Farm, Woodbarton Farm and Bradfield.

The site is located within a wider landscape containing evidence of prehistoric and Roman period activity. To the east there is evidence of Roman iron working as well as place names such as 'Orway' and Stoneyford' that could indicate the presence of a Roman road between the settlement at Cullompton and the iron ore extraction industry operating up on the Blackdown Hills. As such, there is the potential for this landscape to contain evidence of prehistoric and Roman activity in the form of buried archaeological and artefactual deposits.

The current field system and farm landscape dates to the later medieval and post medieval periods. There are likely to be below ground remains of early to post medieval activity associated with farmsteads with and adjoining the site. There is an opportunity within the site area for the enhancement of historic built and landscape features such as ditches, orchards and water meadows as well as the opportunity to incorporate existing water features and leat as important placemaking aspects of the Masterplan. This will be informed through further archaeological investigation.

All plans in this SPD will be subject to further archaeological investigation by developers prior to layouts being fixed and planning applications being submitted.



Utilities corridors

East Cullompton Masterplan SPD

4.7 Utilities

Preliminary infrastructure work has identified the existing utilities within the site. 440kV National Grid (NG) power lines and 132kV Western Power Distribution (WPD) powers lines enter the site in the north-west and run in parallel for a short distance, before bisecting the area on different alignments.

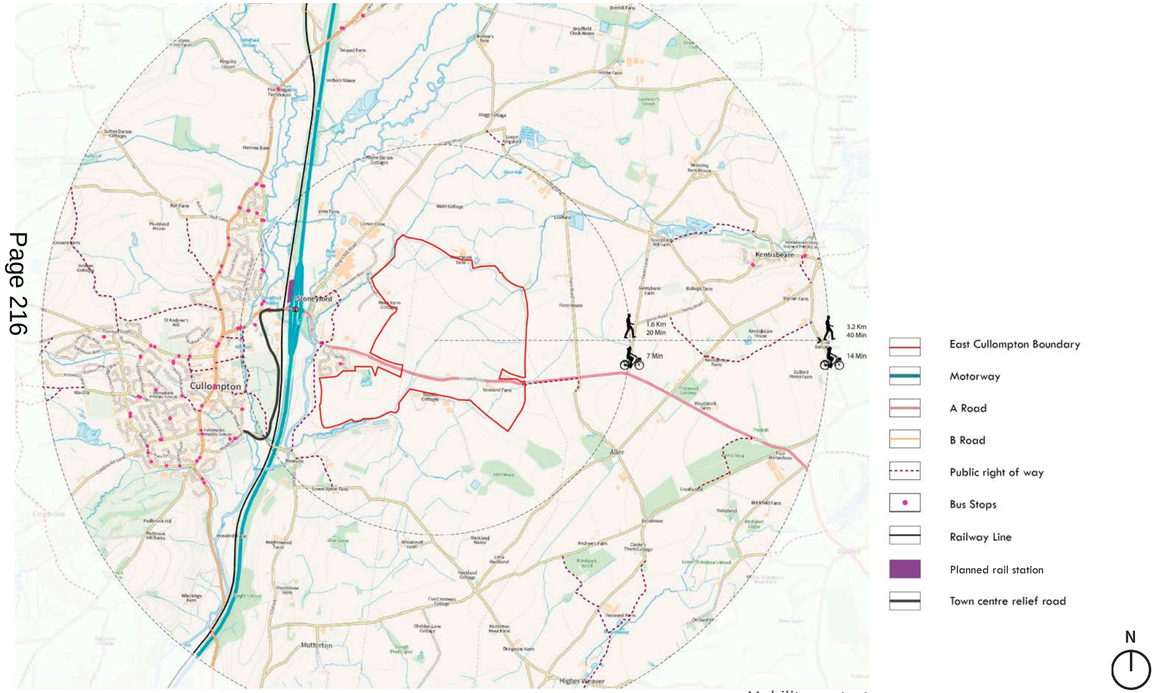
The National Grid (440kV) power lines are a fixed constraint and have been be factored into the masterplanning process. Not only will the easement need respecting, but a residential amenity buffer will need to be established.

There is no set formal guidance on the size of easements but a figure of 60m from any dwelling to the centre line of the 440kV transmission lines (i.e. a 120m corridor) is an approach that has been used in planning policy for development to the east of Didcot in South Oxfordshire. Non-residential uses may need to be considered closest to the transmission lines.

At a detailed level, The National Grid has produced design guidance, in respect of how to Masterplan around transmission lines and treat the space beneath them.

There are options available to reduce the effect of the Western Power Distribution (132kV) power lines. The land over which the lines pass within the site benefits from 'lift and shift' clause over the route easement. This enables the landowner (at their cost) to alter the path of the power lines if an alternative route is available. Land north of the allocation is also in the ownership of the landowner over which the WPD cables currently pass.

In respect of foul drainage, South West Water has indicated that directing foul flows north to Willand Sewage Treatment Works (approximately 3km away) via a new pumping station and rising main would be its preferred option.



Mobility context

4.8 Access and Mobility

One of the core principles embedded in the Masterplan SPD is the idea of the 20 minute place. The purpose of this principle is to encourage local living and self containment within the town for as many day to day needs as possible, reducing the need to travel further afield and creating more vibrant places and stronger local economies. It is therefore expected that East Cullompton and the existing town will be planned as one place, ensuring that all residents benefit from existing and proposed community facilities, shops and employment areas.

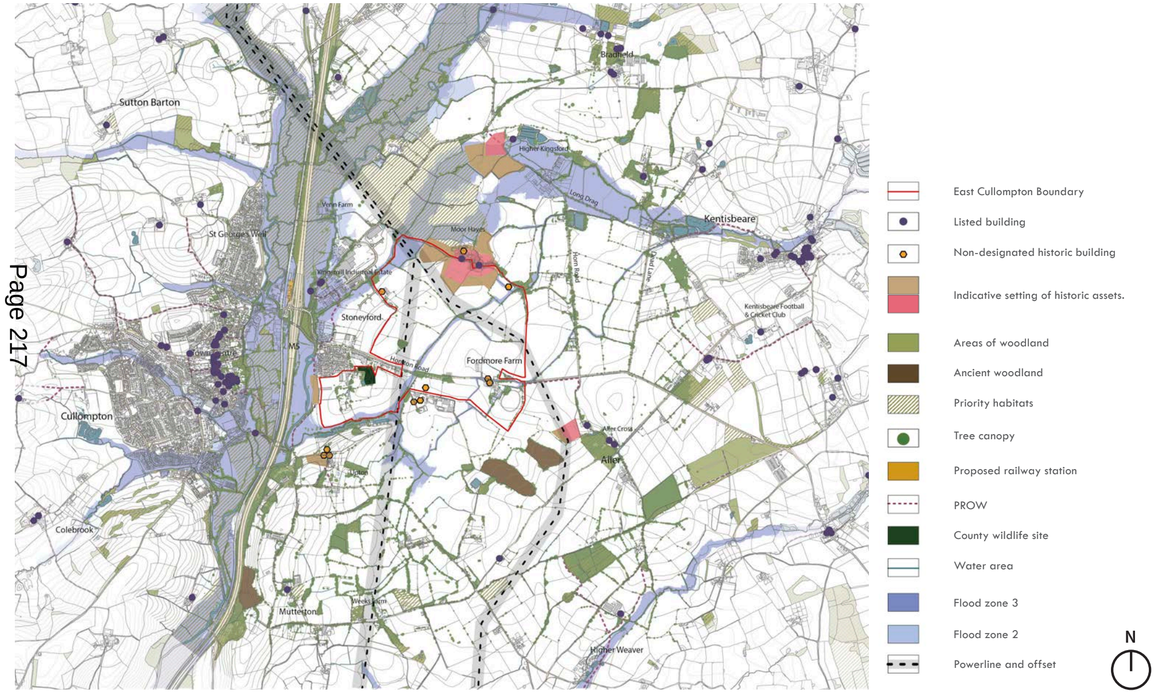
The objective of providing these services within 20 minutes of home is to reduce the reliance on the private car and encourage more active means of travel such as walking and cycling. There are currently no public rights of way across the site, there is a footpath to the west of the site along the floor of the shallow Culm Valley, between the M5 and the site boundary which connects to the two existing crossings of the M5. However, the M5 corridor places a significant barrier to active travel currently and it is important that the Masterplan for development to the east of the M5 incorporates attractive, direct active travel routes and improved crossings leading to key destinations including the Town Centre, schools, open spaces and employment areas on both sides of the M5.

It is recognised that although the site is located nearby to a wide range of facilities, and that the allocation includes provision of new employment areas, shops and community facilities, there will be some that still require day-to-day access outside of a reasonable walking distance. Stonyford is currently served by the 350 Cullompton Town Service and 694 Honiton, Cullompton, Feniton Circular buses, but the services are infrequent. The Exeter, Cullompton, Tiverton Service can be accessed from within Cullompton with an hourly service and journey times of approximately 50 mins to Exeter and 34 mins to Tiverton. Key destinations within the Masterplan will therefore need to be served by improved public transport, and emerging shared use modes of transport such as e-mobility, demand responsive transport and other future mobilities.

The proposed reopening of Cullompton Railway Station will provide a sustainable transport option for all residents of Cullompton, reducing carbon emissions, congestion and improving air quality in Cullompton as well as cutting commuting times. The Station will comprise an important element of any future mobility strategy, providing a vital means by which to reduce reliance on private car use for longer distance journeys currently utilising the neighbouring trunk road network. On this basis, any future railway station must be connected directly to development to the east via exemplary active and shared mobility connections.

East Cullompton is located to the north and south of Honiton Road to the east of the M5 corridor at junction 28. The vehicular access into East Cullompton will need to be achieved primarily from Honiton Road. Honiton Road itself will require significant improvements which may require downgrading of the existing highway to reduce vehicles speeds and reduce the impact future access proposals may have on existing hedgerows and trees. Multiple points of access will be required to allow access to both the north and south of Honiton Road. Options to reallocate space on Honiton Road or incorporate additional space for other users should be considered alongside parallel east - west routes that connect into Cullompton ensuring that priority can be given to active and shared modes.

In addition to the existing highways network, this SPD has been undertaken in parallel with work on both the Town Centre Relief Road and feasibility work on improvements to Junction 28 of the M5. A number of options for junction improvements are under consideration at the time of writing and so the SPD Masterplan retains some flexibility on how access to potential junction locations and crossing points will be configured.



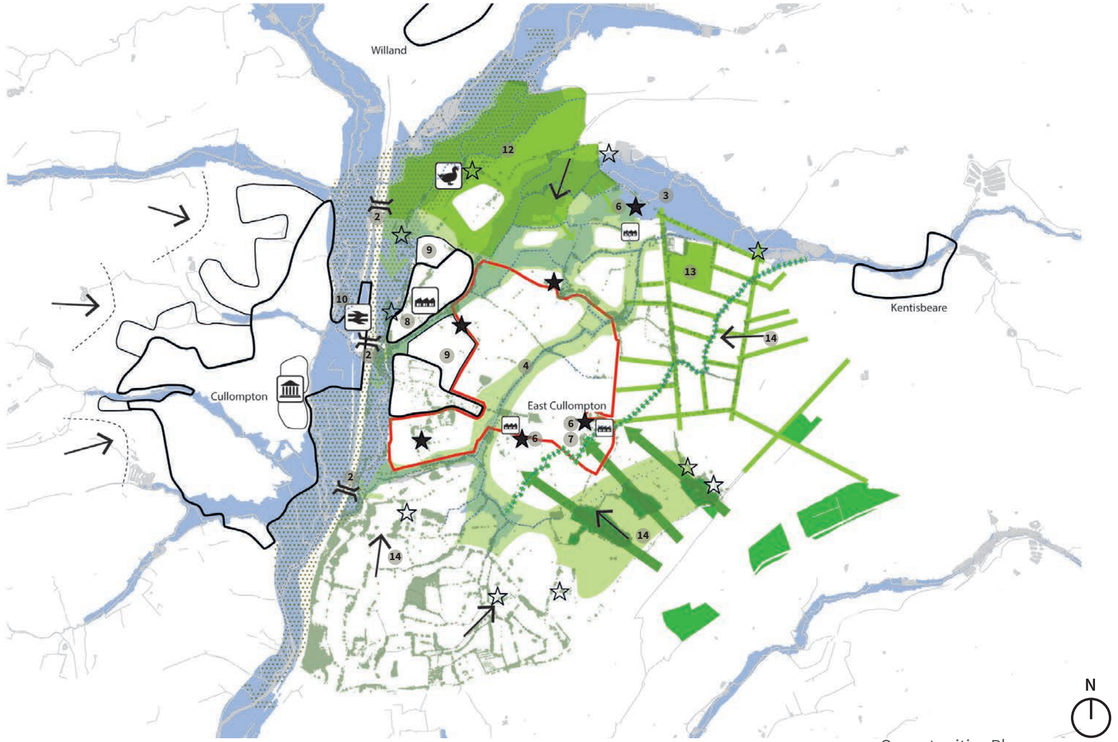
Combined Constraints Plan

4.9 Combined Constraints Plan

The combined constraints plan draws together physical constraints described above into a single plan to show their combined effect. These have been taken into account in the masterplan proposals and include.

- Existing hedgerows and trees to be retained as far as possible.
- Listed buildings around Moorhayes and the area which is currently considered important to their setting.
- Non designated historic buildings which should be incorporated into the masterplan.
- 400kV and 132kV power lines and the associated easements from any proposed dwellings.
- Noise and intrusion from Honiton Road.
- Potential noise and visual intrusion from the M5.
- Water courses and flood zones. The masterplan framework is based on avoiding development with associated flood zones.
- The potential to incorporate and enhance the County Wildlife Site near East Culme House.

East Cullompton Masterplan SPD



Opportunities Plan

4.10 Opportunities Plan

The existing character and qualities of the site offer opportunities for successful placemaking if integrated in an appropriate way. Working with the existing qualities of place has been a central feature of the development of the Masterplan. The Masterplan Framework section explores this potential further, but in summary the main site opportunities include:

1. Consider East Cullompton and Cullompton as one settlement, using this to ensure incoming uses and spaces support the resilience and sustainable growth of Cullompton.
2. Ensure local active and shared travel connections across the river corridor are prioritised including the reconfiguration of existing crossing points which are well located in relation to surrounding land uses.
3. Emphasise the movement of water through the site along the existing water courses. Incorporate new water bodies and wetland planting in lower lying areas of the site to draw the influence of water in to the site.
4. Utilise the watercourses as important connections for active travel back to the historic crossing points of the river corridor to Cullompton.
5. Encourage interaction with water, drawing inspiration from the prevalence of fords in the surrounding landscape, the historic significance of mills in Cullompton and leat within the site.
6. Work with the rural qualities of the site by retaining existing farm clusters and expanding them sensitively as mixed use areas for community and commercial buildings.
7. Support the existing diversification of uses happening on site, such as Fordmore Farm as a focal point for early phases ensure a mix of uses from the beginning.
8. Connect into the existing employment areas to the west of the site.
9. Support the further expansion and intensification of employment areas to provide local jobs and shift away from the existing reliance on out commuting.
10. Provide active and sustainable travel connections to the proposed Cullompton Railway Station site.
11. Utilise existing mature vegetation as a structuring network of green infrastructure through the site.
12. Provide strong links to the proposed Country Park as a strategic area of open space and consider utilising the Country Park as focus for biodiversity net gain in the area.
13. Consider links to the relocated sports clubs to the east of Horn Road.
14. Consider views from the surrounding landscape including elevated land around Upton and Aller, from the open landscape and potential Country Park to the north and from open countryside and Blackdown Hills to the east.



East Cullompton Masterplan SPD

SECTION FIVE
MASTERPLAN FRAMEWORK

SPD Masterplan

Activity

Landscape

Mobility

Placemaking

Infrastructure, Delivery and Phasing



East Cullompton SPD Masterplan

East Cullompton Masterplan SPD

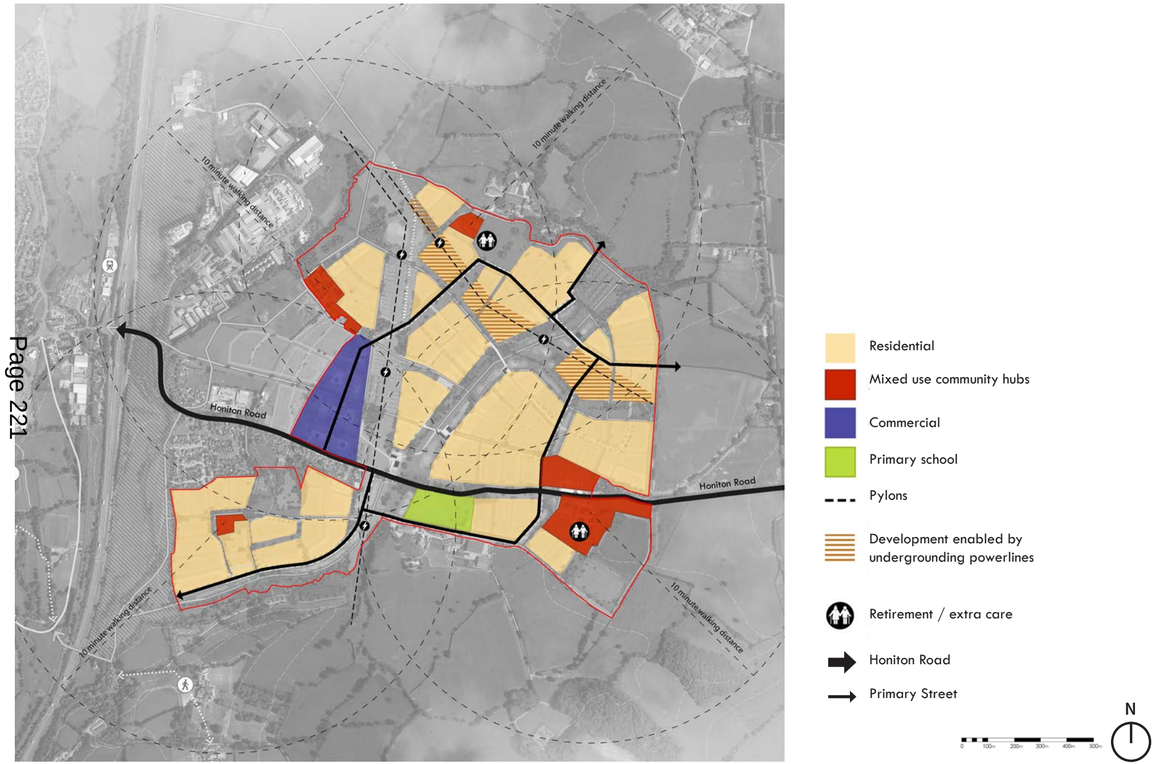
5.1 SPD Masterplan

This section of the SPD sets out a masterplan for the East Cullompton allocation area. It demonstrates how the requirements of the Local Plan can be accommodated on the site driven by the aspirations described earlier in this SPD.

The masterplan is described under the headings of Activity, Landscape, Mobility, and Placemaking. These layers should be seen as providing an organising structure to East Cullompton, setting out the broad locations of development, open space and movement and their relationship to each other. The masterplan also describes specific placemaking aspirations that are considered strategically important that have arisen in response to site constraints, opportunities and through local consultation.

The masterplan is strategic in nature and does not intend to define the precise location and extent of elements of the plan, this will be defined through planning applications and work to agree the detailed phasing and delivery strategy. However, to ensure a comprehensive approach is taken to the planning of East Cullompton, this section translates the Masterplan SPD into a set of requirements in a green text box which planning applications are expected to meet.

Planning applications within the East Cullompton allocation should include a statement demonstrating how these requirements have been interpreted and applied.



East Cullompton Activity Framework

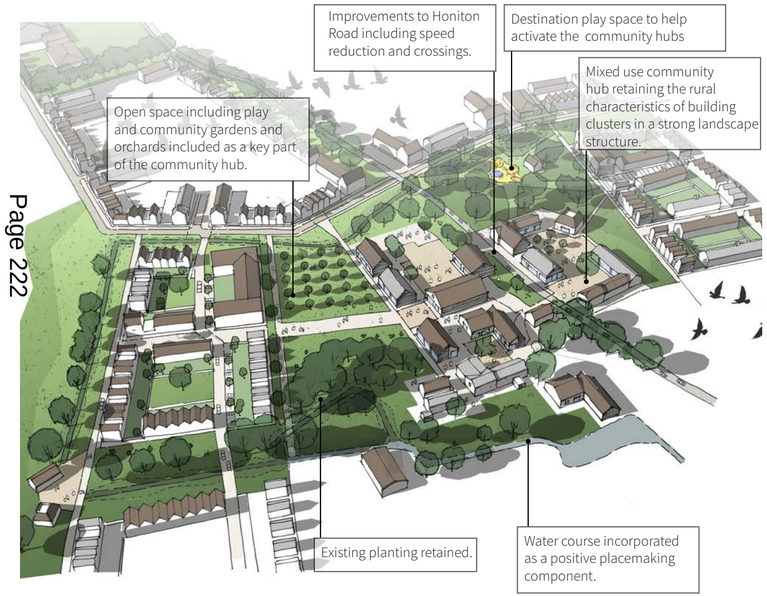
5.2 Activity

The Local Plan sets out the land uses, and quantities associated with the allocation of East Cullompton. The Masterplan SPD proposes a strategy for how this mix of uses can be accommodated and phased in a way which can create a strong identity in response to the existing qualities of the area. Place quality will be a key determinant of the successful integration and longevity of commercial and community space ensuring that they are places that people will be drawn to and choose to use as well as using out of convenience. Community and commercial uses will provide an important function in drawing the community together as well as meeting day to day needs of residents.

The overarching strategy has been driven by a response to activity already happening on site. The creative reuse and expansion of existing building clusters on site provides a model for how future community, commercial and civic buildings can be incorporated into East Cullompton in a distinctive way. These places also provide a useful starting point for future growth ensuring a mix of uses and sense of place is established before housing is delivered. The rural character and local vernacular of these clusters can also be used as a key determinant in new mixed use and community buildings.

	Land area	Notes
Residential	72 hectares	Including market and affordable housing, serviced plots for self builders and gypsy and traveller pitches. Capable of delivering 2,600 homes required by Policy CU7 at an average density of c. 35dph. Assumes limited residential uses will be incorporated in to the mixed use community hubs.
Mixed use community hubs	8 hectares	Area includes existing buildings retained. Capable of delivering an additional 2 hectares for shopping, community centre and multi-purpose community building required by Policy CU10. Assumes some residential uses can be included within the centres and some overlap of uses with commercial area.
Commercial area	6.5 hectares	Including allowance for care home, retirement complex, appropriately scaled retail, offices, hotel and leisure uses and ancillary landscaping. Capable of delivering 32,000 square metres of commercial floorspace required by Policy CU7 with some overlap of uses with the mixed use community hubs.
School site	2.5 hectares	To meet Policy CU10 requirement for a service site of 2.5 hectares for a new primary school.
Green Infrastructure	46 hectares	See separate table within landscape framework for breakdown of open space.
Area beneath 440kv powerlines	16 hectares	
Total	c. 160 hectares	Difference between areas above and the total area comprises area allowance for highways infrastructure (e.g. Primary Streets)

Land budget for Masterplan Framework



Indicative sketch of a mixed use community hub retaining the rural characteristics of the area

Mixed Use Community Hubs



The Local Plan allocates land and facilities for community use including a site of 2 hectares for a shopping and community centre, and the provision of a multi-purpose community building for youth, children and other community uses.

The East Cullompton site is currently very rural in character. Although large parts of the site will change fundamentally in character as development progresses, there is an opportunity to ensure the influence of the rural Mid Devon landscape is still apparent as a positive characteristic in its identity.
The Masterplan SPD proposes that the mixed-use community areas are, in part, focussed around existing farm clusters that are already providing a sense of place and generating activity and a local economy through a diversification of uses. A number of these clusters include listed buildings or non-designated heritage assets which can provide design cues for incorporating additional development in a sensitive way. Supporting the growth and considered expansion of these clusters to provide a broader range of commercial and community functions can be done in a way which preserves their characteristics as building clusters in a strong landscape structure. These can be considered as maintaining a rural character that is fundamentally different to more urban typologies, to differentiate the experience of living or visiting East Cullompton and complement the existing town centre offer. It can also ensure their delivery early which is something which has proven difficult to do successfully in other similar schemes.

- The principal community hub for East Cullompton will be located around an expansion of Fordmore Farm to the north and south of Honiton Road. This hub will expand to include community space as well as further retail and commercial space including potential healthcare, indoor multi-purpose spaces which can cater for a range of activities, including: dance, yoga/pilates, circuits, babies/toddlers activity sessions, short mat bowls, table tennis etc.
- The layout of the area around Fordmore Farm will be done in a way which retains the rural characteristics including an informal arrangement of buildings and courtyards in a strong landscape structure.
- Parking within mixed use areas will be provided in a way which does not compromise pedestrian experience, with main parking areas away from key buildings and spaces.
- These mixed use hubs can include residential use, where it does not detract from intended character or community hub function.
- The materials, detailing and scale of buildings and public realm in mixed use areas will take design cues from existing buildings on site and the aspiration to retain a rural influence.
- Secondary hubs, incorporating smaller scale shops and flexible community space will be encouraged in areas of high accessibility in areas further from the principal hub including at East Culme House near the existing community around Culm Lea and near Moorhayes serving the northern areas of the allocation close to the potential Country Park.
- A community hub near Moorhayes will demonstrate how it can also support the potential Country Park to the north with potential for ancillary uses, spaces and attractive connection points to the Park.
- The area around Week Farm is shown to provide further opportunities for incorporating a mixed use area with a commercial focus. This could serve as an expansion of the existing employment area around Stoneyford providing opportunities for smaller scale commercial uses and workspaces.
- Retirement, healthcare and aged services cluster should be co-located with the mixed use community hubs with good accessibility to public transport.
- Mixed use community hubs should also incorporate appropriate workspace.
- The mixed use community hubs are to be easily accessible from active travel routes and the primary street network.
- Developer proposals will need to demonstrate clear governance structures for community facilities.

East Cullompton Masterplan SPD



Image showing the character of the mixed use community hub at Fordmore Farm



Example of farm buildings converted into a mix of community and commercial buildings around high quality public realm.



Example of community buildings with rural character integrated into open space.

School site



The Local Plan states a requirement for a serviced site of 2.5 hectares for a new 630 place primary school or alternatively 3 hectares of serviced land in 2 parcels of 1.1 hectare and 1.9 hectares appropriately located for the delivery of 2 new primary schools. The Local Plan also requires that serviced land for the school should be provided prior to the first occupation of residential development. The SPD masterplan has sought to locate the school in an area of high accessibility, close to the mixed-use areas. The site shown to the south of Honiton Road has been identified previously as the preferred site of the education authority. Alternative locations may be suitable for the school but would need to meet the following requirements.

- Any school sites to be located close to other employment, community and retail spaces with clear and attractive active travel links between them.
- Clear, attractive active travel routes should be provided from residential areas to the school sites.
- A safe and attractive crossing of Honiton Road should be provided on a clear desire line to any school sites.
- The school buildings should be designed and located to be a prominent and positive feature of the development.
- Proposals should demonstrate how schools will provide an important anchor in the early phases of development.
- The active travel network should include attractive, safe routes to Cullompton Community College in the early phases.
- Appropriate drop off space should be provided away from Honiton Road and the primary streets.



Inset plan of commercial area.

Pedestrian and cycle friendly primary street as a central feature with high quality public realm and strong building frontage.

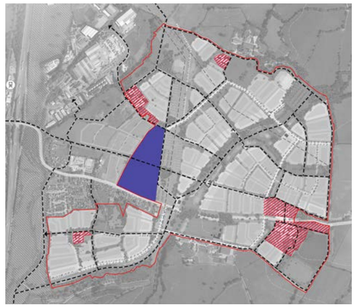
Attractive active travel route linking East Cullompton and Cullompton with strong building frontage.

Existing tree planting retained and extended to provide a strong landscape structure.

Overarching character of commercial area to be defined by individual buildings or buildings grouped around a shared courtyard within a strong surrounding landscape. structure.

Building frontage onto Honiton Road.

Integrating commercial space



The Local Plan allocates 20,000sqm of commercial floorspace within the plan period and a further 12,000sqm post 2033, to include a care home or retirement complex, appropriately scaled retail development and other suitable uses such as offices and a hotel or leisure development. A commercial area of 6.5ha. is shown to the north of Honiton Road. This is of sufficient size to accommodate the majority of the floor area required by the Local Plan. The mixed use community hubs should be used to accommodate the remainder of the commercial space. For example it is anticipated that the care home, retirement complex, smaller scale retail and some leisure uses would be better located adjacent to the community hubs.

An Employment and Skills Strategy commissioned by Mid Devon in parallel to the Masterplan SPD includes recommendations on the employment opportunities and how skills improvement programmes can help to drive business interest in the area. The findings of this report have been factored into the development of the Masterplan SPD and include spatial influences such as:

- Viewing employment as crucial elements of the overall masterplan with a high priority for development in the early phases.
- The clear need for units and serviced, developable employment plots in Mid Devon, with East Cullompton offering a good opportunity to help meet need.
- To expand employment areas adjacent to existing and permitted industrial elements at the edge of the allocation around Kingsmill Industrial Estate.
- To include an element of dispersed employment that could have differing functions and target markets, with proposed employment uses at Fordmore Farm cited as an useful example.

The Masterplan is set out to the following principles:

- Land adjacent to the employment allocation CU17 will provide additional space for commercial uses as an important expansion of the employment area to the east of the M5 and proposed railway station.
- The commercial area will incorporate an east – west active travel route to connect into the rest of East Cullompton. Co-ordination with proposals for employment allocation CU17 will be required to ensure continuity of the route into Cullompton.
- The commercial area will include the mix of uses allocated including retail, offices, hotel and leisure, but should be planned to provide an appropriate transition between larger employment uses to the west and residential use to the east. This will include an emphasis on provision for walking and cycling.
- The layout of the main commercial area should follow the principles described on the employment area inset plan.
- Commercial uses should also be included into mixed use community hubs including smaller scale workspace and co-working space and work hubs that will be drawn to the place quality of these clusters.



Extract of proposed residential areas

Residential

The Local Plan allocates 1750 dwellings within the plan period and at least another 850 dwellings post 2033 taking the overall residential capacity of the East Cullompton allocation to 2600 dwellings. Policy CU7 also requires 28% affordable housing and extra care housing and at least ten pitches for gypsies and travellers and 5% of housing to be provided as serviced plots for sale to self-builders.

The residential neighbourhoods have been formed around the Landscape, Mobility and Land Use Frameworks. Parcels of residential land are identified where they can form coherent neighbourhoods around the organising structure of open spaces, streets and mixed-use areas avoiding areas of development constraint. The Masterplan SPD assumes an average density of 35 -40 dwellings per hectare to achieve the residential capacity set out in the Local Plan. The Placemaking section provides further guidance on character.

Mid Devon District Council wants to enable more people to build their own home with Custom and Self Build housing growing in popularity. The Council recognises the benefits of Custom and Self Build in meeting the housing needs of Mid Devon residents. It provides opportunities to reduce costs by sourcing your own materials and being involved in the construction and fitting yourself and create high quality, well-designed buildings bespoke to your needs. Custom and Self Build Housing is also more likely to draw upon local tradespeople and suppliers, supporting the local economy. Further guidance on the provision of the custom and self build plots will be provided in the forthcoming Meeting Housing Needs SPD. This will provide detail on planning, design and delivery processes and locational requirements such as positioning the plots in smaller clusters and avoiding locating plots on remote corners of the site.

- No residential development to take place within flood zones.
- Typical densities will be in the region of 35 – 40 dwellings per hectare with potential for higher densities in areas of greatest access to sustainable travel and mixed-use areas and potential for lower densities towards the edges of the community.
- Building heights are expected to typically be 2-3 storeys with incorporation of 4 - 5 storey buildings in appropriate landmark locations such as on key junctions or terminating views. Proposals must demonstrate a clear logic to building heights that assists placemaking.

Powerlines

The potential to underground overhead powerlines should be explored, particularly where leaving them in-situ would place a significant obstruction and detraction from the quality of residential areas. Mid Devon District Council's preference is for the powerlines to be moved underground but a final decision will be subject to further masterplanning, feasibility and viability work. The SPD Masterplan shows the eastern 132kv line undergrounded as this would cut through and segregate residential areas hindering the creation of a coherent development form. The area of land made available for development by undergrounding the 132kv lines (as shown) equates to around 7ha. or approximately 250 homes within the allocation area. The potential to realign the route while undergrounding should also be explored. The larger 440kv powerline is left in situ and its alignment used to define the extent of extended commercial areas.

The land beneath the powerlines is not considered suitable for the primary useable areas of public open space, where the presence of the lines would undermine the quality of the spaces beneath. The land beneath may be used for ancillary open space, wildlife corridors, streets and active travel corridors and potentially renewable energy generation. It may also be possible to accommodate commercial space in the area beneath the powerlines although this would be subject to further consultation and demonstrating an appropriate design response to Mid Devon District Council. A 10m wide corridor of open ground would be required above any undergrounded cables.

East Cullompton Masterplan SPD



East Cullompton Landscape Framework

5.3 Landscape

Policy CU9 sets out environmental protection and enhancement measures required for East Cullompton, this section of the SPD elaborates on these requirements showing their application and contribution to placemaking at East Cullompton. Policy CU7 requires allocation site to deliver 40 hectares of strategic green infrastructure, laid out and managed with an appropriate mix of public parkland, open space and landscaping. The site benefits from an existing landscape structure that offers great placemaking potential. Existing watercourses, hedges, tracks, mature trees, and landform can all be used to drive the character and sense of place at East Cullompton.

The MDDC Open Space and Play Area Strategy can be referred to for general guidance on design of open space types. The objective of the Landscape Framework described here is to use the existing clues in the landscape to frame interventions ensuring that:

- New development is rooted in the existing qualities of the site providing a sense of identity and permanence from the outset
- Incoming open spaces simultaneously provide multiple benefits to people, wildlife, and the environment informed by a natural capital approach.

	Land area	Notes
Amenity green space	6 hectares	Accessible areas of green space to be provided within Blueways, Community Greens and areas shown on the Landscape Framework plan as 'Green Infrastructure', where these areas are not adversely effected by flooding, powerlines or sustainable drainage features.
Parks, sports and recreation grounds	9 hectares	To be provided within the Community Greens as more formalised and functional spaces.
Allotments	1.5 hectares	Community growing space such as orchards to be incorporated into Community Greens. Allotments to be provided within the central Blueway, indicative location shown.
Equipped children's play space	0.4 hectares	Primarily provided within the Community Greens with smaller areas for play integrated across the site.
Teenage facilities	0.12 hectares	Older years outdoor and recreation space to be provided within the Community Greens.
Other areas of strategic green infrastructure	29 hectares	Area required for Blueways, retaining existing vegetation and provision of strategic areas of sustainable drainage features.
Area beneath 440kv powerlines	16 hectares	While this area does not form part of the open space requirements, this land could provide space for important green infrastructure functions including wildlife corridors and sustainable drainage features.
Total	46 hectares	Excluding area beneath powerlines.

The Blueways:



Water has played a central role in the history and evolution of Cullompton. The growth of Cullompton to the east of the Culm offers an opportunity to use water as an important placemaking feature and place a renewed focus on water in the town.

A series of existing watercourses traverse the site which each vary in character and ultimately lead to the Culm providing natural connectivity between east and west Cullompton. The placemaking principles below set out how a series of Blueways can embed these watercourses in plans for the future.

- Water courses will be incorporated into three Blueways, shown on the accompanying plan as a positive placemaking feature of East Cullompton.
- Blueways will provide sufficient set back to ensure no development is located within flood zones.
- Blueways will provide the primary areas for consolidation of sustainable urban drainage features including swales and basins making the management and storage of water a visible and positive feature of East Cullompton.
- A 1.5 ha allotment site is required for East Cullompton. An indicative location for this is shown in the central Blueway.
- Blueways will incorporate attractive walking and cycling routes along their length as part of a site wide network of active travel.
- The Blueways will incorporate naturalistic wetlands and water features providing generous naturalistic open space providing continuity with the proposed Country Park to the north.
- The design of these routes will explore the potential for interaction with water and incorporation of water bodies. Design of the southern Blueway will describe how the leat can be retained and celebrated as a positive feature around Fordmore Farm.

- The Blueways will be planned to enable the potential for connectivity into the surrounding area as important landscape corridors and walking and cycling routes.
- The places where the Blueways cross the primary streets and/or the Greenways (described below) will be important points of orientation in the development. Developer proposals must demonstrate how buildings, paths and open space support this landmark function. This may include bringing buildings closer to the water locally, providing community gathering space or varying building height and form. They will also incorporate water or wetland planting as a significant characteristic.



Naturalistic planting around water bodies mixed with areas of mown grass serving a broad range of functions.



Drainage features characterised by naturalistic planting.



Strategic drainage areas with strong building frontage.



Rain gardens integrated in waling and cycling route.

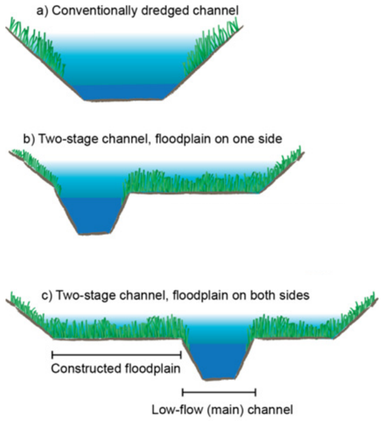


Strategic drainage areas with naturalistic planting and water storage.



A high-level drainage strategy has been developed as part of the Masterplan SPD. The principals of the strategy are to allow for rainwater storage on plot (e.g. in rain gardens) and then the remaining storage provided as a combination of network storage (e.g. swales or linear drainage features in parallel with existing flow paths or channels) feeding into larger strategic storage elements (e.g. infiltration / attenuation basins). This will follow the Sustainable Urban Drainage Systems (SUDS) train to ensure the necessary treatment of any runoff. The advantage of utilising larger storage features is to reduce / make more efficient the overall maintenance requirements for the drainage features and to provide areas of habitat and amenity.

- The SuDS hierarchy should be followed, by using infiltration as far as is practicable. In addition, all off-site surface water discharges from development should mimic “Greenfield” performance up to a maximum 1 in 10 year discharge rate or lower if possible.
- All on-site surface water should be safely managed up to the “1 in 100+climate change” conditions. This will require additional water storage areas to be created thereby contributing to a reduction in flooding downstream.
- Strategic storage areas should be located in the Blueways, with some of the storage providing areas of permanently wet habitat to also help provide increased biodiversity as part of the development.
- Explore the use of cascade basins in strategic storage locations where this would help deal with the steepness of the overall catchment. The basins, and the connectivity between them, offer the potential for amenity and ecological benefits, as well as drainage and flood risk management.
- Explore the use of two stage channels, in combination with storage basins, weirs and meandering channels, as a means of ensuring a permanent water presence can be maintained, while providing additional capacity for flood flows and storage.





Buildings adding to the character of green space with natural materials.



Incorporating water as a positive feature.

Minimum levels for development parcels

The development parcels for the SPD Masterplan have taken into account the location of the flood zones. The parcels avoid areas of flood risks and allow space adjacent to the drainage channels to incorporate strategic storage as part of the overall Surface Water Drainage strategy for the area.

- The minimum acceptable levels of the development parcels will be set based on the 1 in 100 year plus climate change peak water level with a freeboard allowance included. This ensures that all of the development will be safe in during a flood event based on the recently updated guidance.

Crossing points and fords

The aim for the management of the drainage channels through the allocation area is to utilise and improve the existing channels where possible. This will include consideration of crossing points for transport links. Fords already have a distinctive presence in the wider landscape allowing a connection to the watercourse to be maintained, providing an alternative to bridge and culverts, which have a risk of blockage, particularly with beavers known to be within the wider Culm catchment.

- Fords will be considered within the overall water management strategy. These can be designed to have small culverts underneath to pass the normal flow so that the ford itself is only utilised in flood events.
- Due to the risk that in a flood these will not be passable, the wider transport strategy will ensure there are alternative routes available so that safe access/egress is always possible.
- Where fords are proposed as part of the allocation area, signage will be provided to explain the idea and when there are potential restrictions to access.



Indicative study of crossing points on Blueways.



Existing fords in the surrounding area.



Inset plan of crossing points on Blueways.

East Cullompton Masterplan SPD

Greenways



- Greenways will be planned to complement Bueways, providing a connected network of active travel routes across the site. Generally, they will run towards and across Blueways to form a grid.
- The character of each Greenway can vary to its context either running through larger green spaces or provided adjacent to streets within built areas but must provide attractive, dedicated space for pedestrians and cyclists and planting.
- The combination of Greenways and Blueways will provide walking and cycling loops around the site. The loops will serve multiple functions from direct routes to key destinations to slower, recreational routes at the edges of East Cullompton.

The Eastern Loop



Defining the eastern edges of East Cullompton is important in the early phases where development meets the open countryside. The potential future expansion of East Cullompton promoted through the wider Garden Village opportunity requires that this edge also considers the flexibility required to allow possible further phases of development to connect in future. It is envisaged that this will form an attractive edge to East Cullompton defined by walking and cycling routes, planting and a building edge that responds to views from the surrounding area.

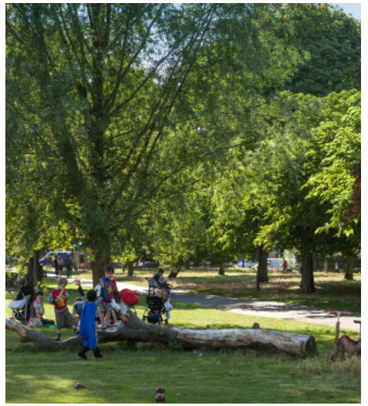
- The Eastern Loop will be a Greenway planned to follow the northern, eastern and southern edges of East Cullompton, in the early phases this will provide an active travel route around the outer limits of the development providing interaction with the open countryside.
- The design of the Eastern Loop will demonstrate how it allows for future phases of development to connect into this route to ensure a positive interaction between East Cullompton and any potential future phases of the Garden Village.
- The Eastern Loop will vary along its length but will provide sufficient space to retain existing trees and hedges at the edge of the site and provide space for new planting, hedge banks, and hedges to filter views of development.
- The Eastern Loop will run from the Public Right of Way at Old Hill around the site boundary to Week Farm.
- The Eastern Loop will run through and connect key green spaces including the Community Greens, Blueways and demonstrate the potential to connect to the Country Park.
- Screen planting to be incorporated within the Eastern Loop to protect the amenity of existing houses properties on Honiton Road and views from the surrounding area.

Enhancing the Existing Landscape Structure



The inherited landscape features of the site will only thrive if they are given sufficient space and will only realise their full potential for nature if they are part of linked open space and habitats. The positive retention of existing trees and hedges is a core part of the placemaking objectives for East Cullompton established in policy CU9 of the Local Plan and Stage 1 SPD. The natural capital mapping also stresses the importance of avoiding disturbance to soil beneath existing trees and hedges, the Landscape Framework therefore extends areas of open space around and between significant areas of existing vegetation as far as possible.

- Existing trees and hedges will be incorporated within areas of open space with sufficient building setbacks to ensure longevity of trees and allow for additional complementary planting that can provide habitat enhancement and connectivity.
- Significant trees and hedges will be incorporated as linear features as far as possible and part of a connected grid of open spaces that lead to the edges of the development providing connectivity with the surrounding landscape.
- New tree and hedge planting will be required to the site boundary, particularly the east where there are no existing hedges and trees. This planting should filter and manage views rather than attempt to completely screen development.
- Additional planting will be included to the western boundary of the site helping to provide screening to the M5.
- Additional planting will be required to demonstrate climate resilience and improve biosecurity.



Open spaces incorporating existing mature trees as a central feature.

Community Greens



The Community Greens (shown in dark green) are intended to serve as key community gathering spaces in East Cullompton, providing the principal focus for play, parks and recreation grounds as set out in the Landscape Framework Land Budget. Sports pitches will need to be provided in accordance with the MDDC Playing Pitch Strategy, this includes a preference for a 3G pitch. The Community Green at Fordmore Farm is shown at sufficient scale (5.5ha) to accommodate the allocated requirement for sports pitches in one location but off-site provision of these would be considered if a more suitable location can be demonstrated. Although the exact size and location of open space will be determined through planning applications, the SPD masterplan shows approximately 9.8ha of space within Community Greens which is sufficient to provide the main play space, teen facilities and policy requirement for Parks, sports and recreation grounds.

- At least three Community Greens will be provided in the areas around East Culme House, Fordmore and Moorhayes.
- The Community Greens will be laid out to provide the core open space functions required by the Local Plan open space standards incorporating parks, play areas, teenage facilities, recreation space, sports pitches and community orchards.
- Plans for the Community Greens should demonstrate how they provide sufficient flexibility to accommodate a range of temporary community events and gatherings.
- The Community Greens are co-located with mixed use areas and must be planned to be visually prominent from within areas of surrounding mixed-use development.
- The Community Green at Moorhayes will be planned to create an appropriate setting to listed buildings at the edge of the allocation boundary.
- The Community Green at East Culme House will provide an appropriate setting to the County Wildlife Site in this location.
- The Community Green at Fordmore will provide an appropriate setting to the non-designated heritage assets as well as enhancing the character of this area as a mixed-use hub capable of retaining the rural qualities of the area and will incorporate areas for community gardens and orchards.
- The Community Greens will be supplemented with smaller areas of informal open space and play across the site.
- Sports pitches are to be provided within the Community Greens in accordance with Mid Devon District Council Playing Pitch Strategy unless offsite provision in a favourable location is agreed with MDDC.
- Areas adversely effected by powerlines or flooding will not contribute to meeting open space standards.

East Cullompton Masterplan SPD



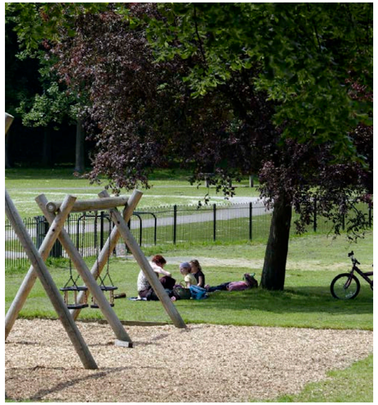












Character images of Community Greens showing a broad range of functions, including food growing, play, sports and community space.



Aerial view of the River Culm in the area being explored for the Country Park

Country Park and off site landscape improvements along the River Culm



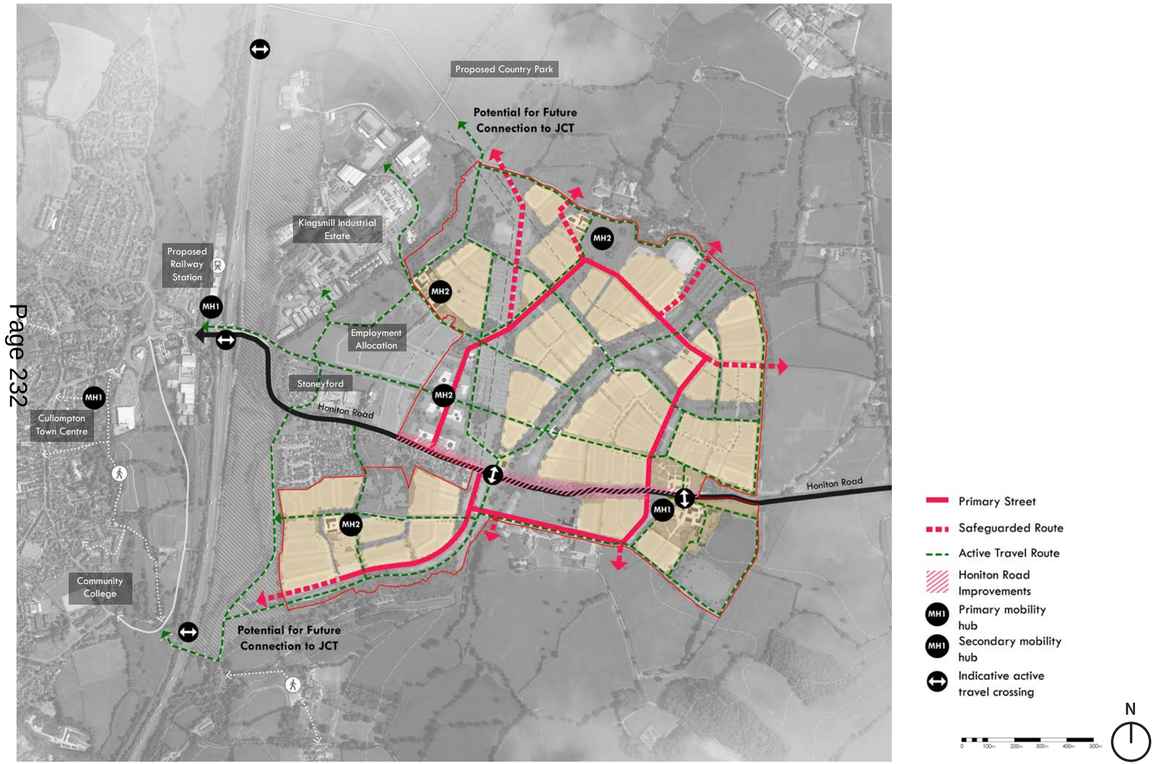
One of the key principles of the SPD is to ensure that East Cullompton is experienced as part of one town with existing parts of Cullompton. This aspiration places significance on the River Culm corridor in creating the setting and point of connectivity between eastern and western parts of Cullompton in the future. Mid Devon District Council are exploring plans for a Country Park to the north of East Cullompton around the River Culm to serve new and existing residents. The Country Park has the potential to provide an outstanding asset to the wider area. The Masterplan Framework also identifies the areas of riverside adjacent to the M5 as having a potential role in providing strong links between all parts of Cullompton. While not a formal requirement of the SPD, the Country Park and areas of riverside can provide important walking and cycling links, off site public open space provision and also assist with delivering off site biodiversity net gain if required. Mid Devon District Council will work with developers to explore the delivery of these enhancements.

In addition, proposals at East Cullompton can support and enhance these proposals by ensuring the Blueways provide attractive walking and cycling connections to the proposed Country Park to the north and by ensuring that the landscape design of the Blueways provide a continuation of the qualities of the Country Park into the East Cullompton allocation area.

Biodiversity Net Gain

Biodiversity net gain is required by the National Planning Policy Framework, The Environment Act 2021 and Policy DM26 of the Mid Devon Local Plan 2020. To demonstrate measurable biodiversity gain, the Defra Biodiversity Metric 3.1 calculation tool (Defra, 2022) has been used to provide an initial indicative calculation of the biodiversity value of the Allocation Area, both for the existing baseline conditions and for the post-development masterplan scenario. Although strategic in nature at this stage, this calculation indicated that the masterplan framework would not deliver the biodiversity net gain required within the allocation area alone, although this should be explored and prioritised in accordance with the mitigation hierarchy. The biodiversity net gain calculations did however identify suitable land within the wider area to provide habitat creation and enhancement outside the allocation boundary. The wider area includes cropland and modified grassland which have the potential to offer significant biodiversity net gain. As an example, the enhancement of approximately 15 ha of existing modified grassland to create neutral grassland of moderate condition, and replacement of approximately 15 ha of cropland to provide neutral grassland of moderate condition will provide an overall gain of 55.88 units, and a 10.77 % net gain. These enhancements could be provided as part of the Country Park.

Developer proposals must demonstrate how biodiversity net gain will be delivered, either on site within the allocation boundary in the first instance, or through off-site contribution to the delivery of landscape enhancements. Mid Devon District Council's preference would be for off-site improvements to be delivered in areas adjacent or accessible to the East Cullompton allocation.



East Cullompton Mobility Framework

5.4 Mobility

Approach to mobility

Policy CU8 of the Local Plan sets out the required transport provision associated with East Cullompton. This includes contribution to, or delivery of improvements to junction 28 of the M5, the Town Centre relief road, reopening of the railway station and provision of walking, cycling and bus routes at appropriate locations throughout the development as part of future planning applications.

The Masterplan Framework has adopted the 20 minute place principles and Sustainable Accessibility and Mobility (SAM) framework, where the priorities are as follows;

- Substitute Trips: Replace the need to travel beyond your community
- Shift Modes: For longer trips, use active, public and shared forms of transport
- Switch Fuels: For any trips that must be made by car, ensure the vehicle is zero emission

The Vision and Overarching principles for East Cullompton re-enforce this at the local scale with the aspiration to reduce the reliance on out-commuting from Cullompton to create more vibrant communities and to help address the current climate emergency. With this approach and the overall vision in mind, traffic assessment should be focused on people's core access requirements, over capacity enhancements or optimisation of route convenience for cars. The prioritisation of highway infrastructure, may inhibit the full potential of other measures. To achieve the site's full potential, an approach to the assessment of traffic impact should be used which realises the greatest level of modal shift. It is expected that the Sustainable Accessible and Mobility hierarchy guides planning applications for each phase of development in support of the overarching vision for East Cullompton. The Infrastructure, Delivery and Phasing section sets out the requirement for a co-ordinated approach to transport assessment.

Junction 28

At the time of preparing the SPD, the preferred option for strategic highways improvements had not been determined. The Masterplan therefore leaves flexibility for the preferred solution to be developed, indicating locations for safeguarded routes should alternative junction locations to the north or south be required. What is clear through the preparation of the Masterplan SPD is that newly designed highways and junction infrastructure and modifications to existing infrastructure that improve mobility must not adversely impact the qualities of Cullompton and its environs as a place. Indeed, it should contribute to place-making.

It is clear that local connections across the M5 corridor are critical to delivering the aspirations for East Cullompton. Initial consultation has identified that Suicide Prevention should be a priority for a bridge crossing in a location of this nature. Indicative locations for active travel crossings of the M5 are shown on the SPD Masterplan, further co-ordination with ongoing design of offsite infrastructure will be needed, including junction improvements to ensure this requirement is delivered effectively against the following principles.

- Delivering effective active and shared travel crossings of the M5 in the locations shown should help to define the preferred location and arrangement of junction improvements ensuring active and sustainable travel is a key consideration in the overall movement strategy. These broad locations have been set to provide the most direct routes possible to the Town Centre, Community College and Railway Station.
- The central and southern active and shared travel crossings must be prioritised as an early part of proposals at East Cullompton. The northern crossing should be considered where it could be delivered in parallel to a new junction.
- The detailed design of active and shared crossings must demonstrate how these will be attractive and safe for users and encourage their use.
- Well-designed infrastructure must "fit" in terms of scale height and visual impact and make its own contribution to place.

Active Travel



The Blueways and Greenways described in the Landscape Framework set out how a connected network of active travel routes can be provided across East Cullompton. As well as providing an important healthy living and recreational function they will form an important part of a mobility strategy that reduce the reliance on trips made by car.

- An active travel network must be developed that demonstrates how it provides direct and attractive connectivity to key destinations within the site and into the surrounding area.
- A dedicated active travel route will be provided between the community hubs and Cullompton Town Centre, Community College, key employment areas and Rail Station. This will comply with current best practice. Active travel routes should ensure that the earliest stages of development benefit from viable alternatives to the private car, from the outset.
- A phased approach to the provision of key active travel links will be provided, seeking to maximise the connectivity of subsequent development parcels. This will provide links to key land uses and transport interchanges outside of the site, along with internal connectivity to a network of key Mobility Hubs throughout the site. Such links will comply with current best practice guidance, such as that contained within LTN 1/20 or its successor.
- To increase the attractiveness of such links, secured by design principles will be key. Routes may therefore benefit from facilitating multiple modes, including light traffic use such as bus/shared mobility.
- Active and shared travel routes should be supported by clear signage to facilitate wayfinding within the development and connecting to surrounding routes and destinations.
- Active and shared travel routes may run alongside other streets but proposals must demonstrate how they provide attractive and functional space for a variety of users and how priority can be given over vehicles.
- Active travel routes should be more direct and attractive than using the private car and



Example of dedicated space provided to cyclists and pedestrians separated from the carriageway with tree planting and sustainable urban drainage.

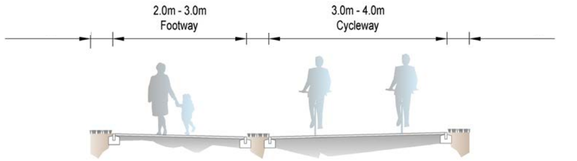


Example of a junction between a street and a footpath where a raised table and textured paving gives priority to pedestrians

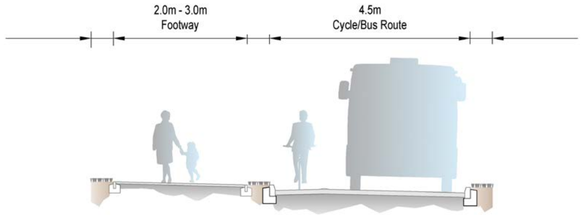
should be free of interruption as far as possible.
- To deliver the points above Active Travel connections into and through employment areas to the west will need to be explored particularly through allocation CU17 and along the River Ken Blueway past Week Farm.
- Proposals should demonstrate how active travel routes can be extended into neighbouring parcels and beyond into communities including Kentisbeare and Willand.
- Walking and cycling routes should connect to the Public Rights of Way at the River Culm and opportunities to improve and extend these routes explored.
- Active travel routes and street design to provide sufficient space for all users including mobility vehicles.

Shared Mobility

- The implementation of key shared mobility routes providing spaces for buses and demand responsive transport will be agreed to connect the site with the town centre and railway station. Consideration should be given to a circular route encompassing both existing M5 crossing points, allowing residents the opportunity to benefit from direct links to the south of the town, bypassing Junction 28, with Cullompton Community College providing a key destination during the earlier stages of development.
- Demand responsive transport may represent a viable alternative to timetabled public transport provision, and provide a commercially viable solution during the initial development phases. A range of options will need to be considered which may increase in scope and coverage throughout the lifetime of construction.
- Careful consideration needs to be given to key destinations outside of the town, particularly those that currently rely on the private car for journeys, such as major employment destinations.
- The implementation of key active and shared mobility connections will be required in advance of strategic highway infrastructure improvements, making best use of existing links across the M5 during early stages of development. This should aim to ensure that traffic is managed down at every opportunity.



Typical section of active travel route.



Typical section of active travel route alongside shared mobility route.

Street Hierarchy



A clear street hierarchy must be demonstrated that creates an easily understood structure to all development areas in each phase.

- The primary and secondary street network should be planned to minimise crossings of green infrastructure corridors and dedicated active travel routes.
- The design of the primary street network must demonstrate how it is co-ordinated with junction improvements to the M5, which may require demonstration of safeguarded routes to potential future junction locations.
- The design of the primary and secondary street network must demonstrate how it could be extended into surrounding parcels, ensuring continuity and clear street hierarchy in potential future phases of development.
- SUDs and planting should be incorporated into all primary streets, which could include permeable paving and other features such as swales or rain gardens.
- Tree planting should be incorporated as a prominent feature into all primary and secondary streets.
- All streets through development areas will be designed to a maximum of 20mph speed and this will be clearly apparent in the detailed design of the street. On long straight sections of street, slower speeds will be encouraged through changes in carriageway material, build outs to alter the carriageway alignment and narrowing of carriageways at key places.
- Streets for a Healthy Life should be used as a detailed checklist for developing appropriate design response to each street type.
- The primary street network should provide access to the mixed-use community areas and schools but highways design should not dominate these areas. Opportunities to separate key gathering spaces from parking and highways should be explored to ensure public spaces can remain at a comfortable, human scale.
- The Masterplan Framework shows a primary mobility loop serving the main areas of development with a view to incorporating a bus route through East Cullompton.
- Subject to the preferred junction 28 solution the primary street to the south of East Culme House could be realigned to run through the centre of the development.



Example of a primary street with strong building enclosure, space for pedestrians and tree planting.



Example of a primary street consistent built form and boundaries, street trees and sustainable urban drainage.



Example of a secondary street with consistent building line and boundary treatment, front gardens, street trees and on street parking.



Example of a tertiary street with limited vehicle role and the scale of the street has been reduced.

Honiton Road

Whilst Honiton Road is an A road and plays a key movement role in the wider highway network, it will also need to form a stronger place function within East Cullompton achieving safe and pleasant environment that responds to local context along its length.

The current alignment has the potential to disconnect key parts of East Cullompton which in turn may discourage walking and cycling. Low speed environments should be promoted with the reallocation of road space through the allocation area, enabling road users to give way on a more conciliatory basis facilitated by a range of both uncontrolled and controlled crossing points to cater for all users and abilities.

A strong sense of place will need to be created around Fordmore Farm, whilst facilitating movement in a manner that does not create unnecessary conflict between road users. Detailed highways design to reduce vehicle speed along Honiton Road will assist in ensuring that a higher priority can be given to the needs of pedestrians, cyclists and public transport users. The context of each section of the road within the East Cullompton area should be used to develop a proposed movement framework with distinct character types in residential, commercial and mixed use areas that seek to reduce the overall vehicle dominance of Honiton Road.

It should be demonstrated that the priority afforded to each mobility mode reflects its function within the development, and the volume of pedestrian and cycle traffic anticipated. Vulnerable road users should be given appropriate priority, noting that different demographics may benefit from alternative levels of priority over traffic. Within mixed use areas, at active travel crossings and in the vicinity of schools, where pedestrian footfall and cycle traffic is higher, priority should be facilitated through both active and passive means, relying on both signal crossings and informal crossings.

Junction layouts from Honiton Road should avoid highways dominance and will need to prioritise active modes, ensuring safe movement of pedestrians and cyclists across key areas of conflict. Alongside this, consideration should be given to other forms of mobility including e-mobility and traditional and future forms of shared mobility. It should be demonstrated that the level of priority is commensurate with its movement function and the vulnerability of road users, including priority at side roads and signal crossings at key routes along its length.

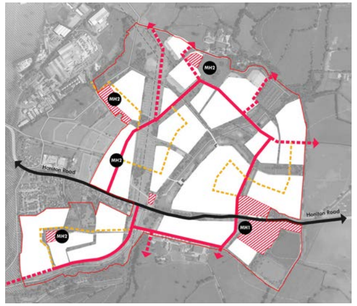
Consideration needs to be given to how the use of the corridor will change over time, both during the phasing of the development but also it's longer term life cycle. Mobility strategies should be developed to predict and incorporate

future expectations over the long term. Some flexibility should be incorporated to ensure that key interchange points can adapt to future mobility expectations. This might mean greater space for pick-up/drop-offs for example, the recognition of changing demands on the mixed use buildings fronting the route or the need for greater space for people to pass, stop, rest and socialise.

A co-ordinated design scheme is required for Honiton Road which would allow the road to perform a 'place' function regardless of volumes of traffic. Reduction in speed reduces the space required for vehicles as well as offering potential environmental benefits and reduced noise. A scheme design should demonstrate:

- Zoning of the route where it moves through either residential or mixed use areas with appropriate development frontages.
- Reallocation of space to multiple users.
- Active travel crossings at key desire lines.
- Place over movement function.
- Direct access points off Honiton Road while aiming to reduce the scale of access junctions.
- A range of parallel mobility solutions reducing the priority given to cars.

Mobility Hubs



Mobility hubs are points in the new development where a range of mobility solutions are offered. Detailed proposals will need to be developed through design codes and planning applications and agreed with key stakeholders to ensure that Mobility Hubs are implemented at key locations in the town and throughout East Cullompton. The range of transport solutions available at these destinations should form part of a strategy that will seek to prioritise shared and active modes over the car, and provide a range of inclusive mobility solutions that can be utilised by the widest possible demographic. This may include on demand solutions such as bike or scooter hire, car club spaces, along with complementary services and facilitates that will encourage the take up of alternative modes such as buses.

- Mobility hubs should be well integrated into development areas, providing high quality public spaces offering people an alternative to the private car.
- The success of mobility hubs will be dependant on usage, primary hubs should be prioritised in areas of highest demand, i.e. around the railway station, primary mixed use areas i.e. Formore Farm, the Town Centre and employment areas.
- Secondary and tertiary hubs can be provided as part of a wider interconnected network where they can provide services appropriate to their area. They will include a more limited provision of services, and points at which docking stations or drop off/collection points could be provided. These will need to be included within attractive and convenient locations throughout East Cullompton.
- The effectiveness of mobility hubs is reliant on a network that allows convenient and predictable movement to the wider area. They should aim to provide greater ease and offer a more attractive proposition than travelling by car. A clear branding across the whole hub network will increase visibility and user awareness, which would complement a marketing strategy to raise awareness, inspire change, and provide advice on how to use the facilities.
- Further detail on the provision of mobility hubs will be developed through planning applications.

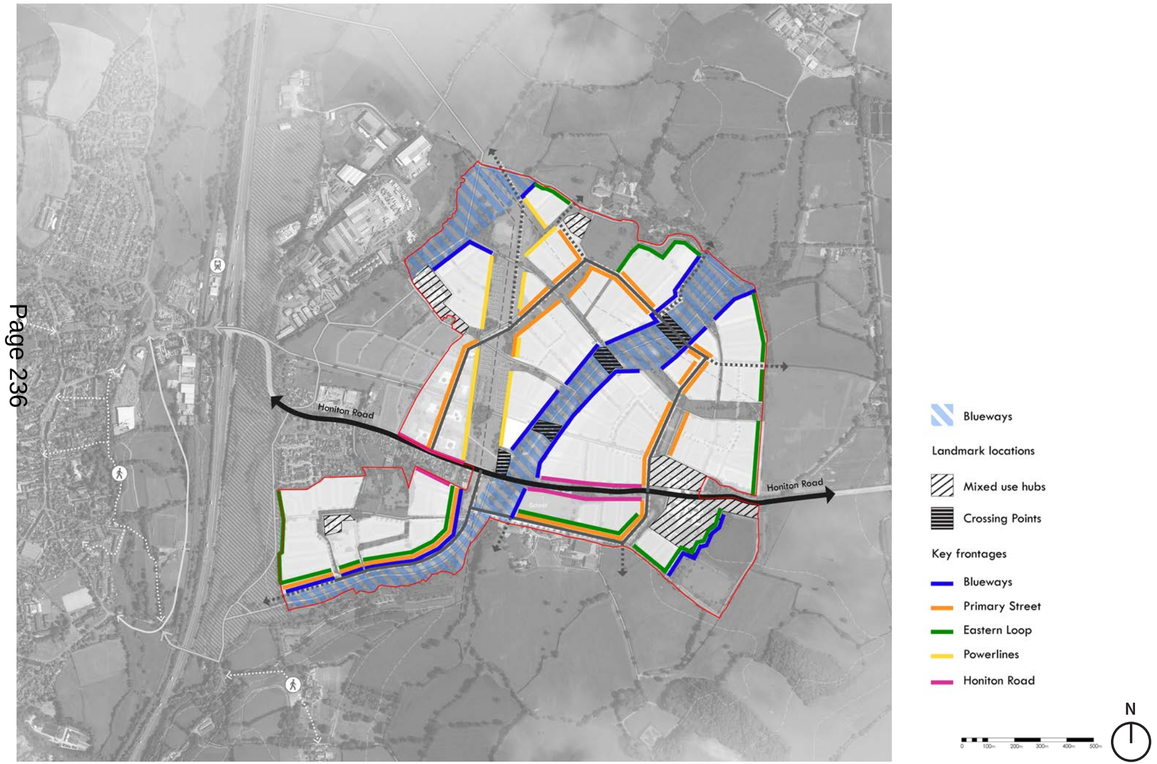








Examples of mobility hubs, demand response travel and space dedicated to active travel.



East Cullompton Placemaking Framework

5.5 Placemaking

The Placemaking Framework is primarily made up of a combination of the Landscape, Mobility and Activity layers described above. This sets out the organisation of the key spatial features of the SPD masterplan and how they relate to each other. The following additional principles have been defined in response to site characteristics, the vision and through consultation as important placemaking principles for East Cullompton.

Integrating water

- Masterplan proposals must demonstrate how water has been used as a positive placemaking feature. This may include areas of wetland, new water bodies and integration of moving water as a visible part of the scheme. It is expected that water will be incorporated into prominent areas of the plan i.e. in mixed use areas and at key crossing points of movement corridors.
- Development parcels should be clearly structured around water and water courses and explore opportunities for bringing key buildings closer to water.

Overarching character

- It is expected that the overall character of East Cullompton will be defined by the interaction of buildings and the elements described on the Placemaking Framework. There should not be arbitrary changes in character, instead neighbourhoods should be structured clearly around this Framework.
- Building enclosure and architectural detailing should be planned with sufficient consistency to a neighbourhood, street or greenspace to create recognisable character. Consistency can be achieved by providing a repeating pattern of development components such as building line, height, form, roof line, boundary treatments, architectural style, or restrained palette of high quality materials. Variations in these components should be done in a deliberate way to place emphasis on landmark locations.

Key Frontages

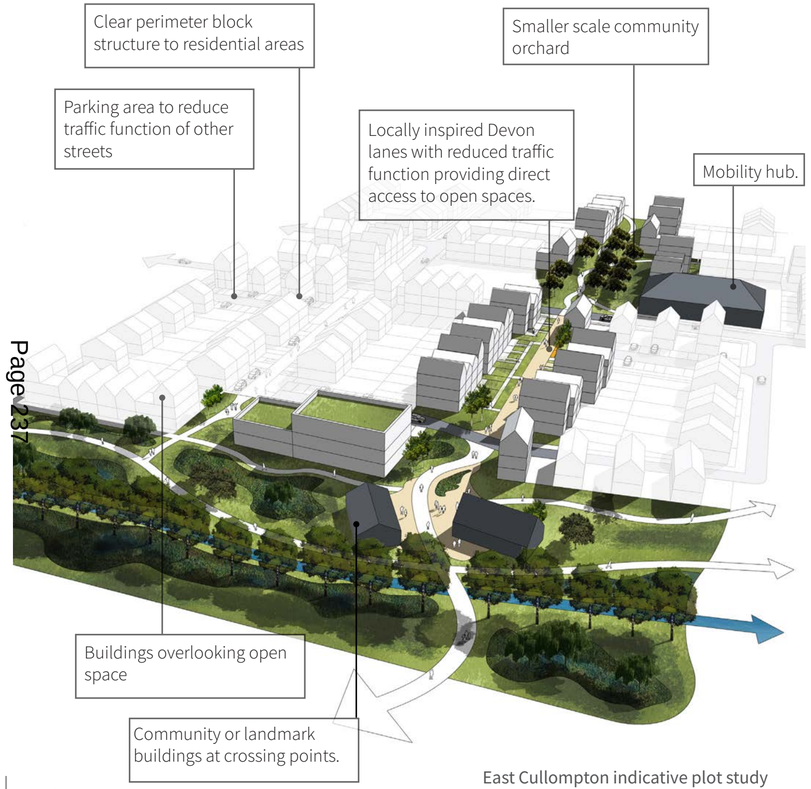
- Buildings should provide frontage and overlooking onto adjacent publicly accessible streets and spaces. Rear fences, walls and parking courts must not become dominant features. In addition, the following have been identified on the Placemaking Framework as key frontages in setting the overall character and legibility of East Cullompton.



Consistent approach to character through materials, building form and building set back. Planted boundary to public space. Coloured render is used to add interest.



Example of a strong building frontage onto a green space.



East Cullompton indicative plot study

- Blueway: The Blueways are a key organising feature of the masterplan, the open spaces of the Blueway are an important part of the character. Proposals must demonstrate how buildings can contribute to the character of these corridors in a consistent way. It is expected that a strong frontage is created to the Blueways.
- Primary Streets: Buildings should have active frontages with windows and front doors onto the street. Large areas of blank façades will not be allowed. The buildings along the street should have a uniform rhythm with consistent height, roof lines and massing with marker buildings in key locations as the exception to this. Buildings should have a consistent building line and set back from back of footway. The set-back should be minimum of 2 metres. Buildings should provide consistent and high degree of street enclosure. All gardens should have a defined boundary treatment such as a low wall with planting and this should be consistent along the primary street.
- Eastern Loop frontage: The Eastern Loop forms the development edge to East Cullompton and will meet the open countryside. Proposals must demonstrate how the building frontage can create a lower density edge where building massing is matched by tree and hedge planting.
- Honiton Road: The Mobility Framework describes how Honiton Road will need to change as part of East Cullompton to ensure that it forms a place function as well as its current movement function. A key part of that will be ensuring that a strong development frontage is created. Proposals must demonstrate how this will be achieved. It is expected that the building frontage will vary as the road moves through different areas including the mixed use community hubs, residential areas and the commercial area.
- Powerlines: Where powerlines are left in situ, they will present a significant obstruction due to their associated easements. Proposals must demonstrate how buildings will provide some overlooking of the powerline corridors from adjacent properties. It is expected that this will not be from the primary frontage of buildings but from gable ends with windows and building entrances. Continuous rear fences to publicly accessible green spaces will not be accepted.

Landmark locations

- Mixed use community hubs: Non-residential buildings should reinforce the aspiration to utilise the rural character of the site and its context in the layout, detailing and choice of materials. Typically, this will involve single, or two storey buildings laid out in an informal arrangement within a very strong landscape utilising the form and type of materials found in the surrounding area.
- Crossing points: The Landscape Framework describes the use of crossing points as key points of orientation in East Cullompton. Landmark buildings should re-enforce this role with taller buildings, bringing buildings out into the landscape or including mixed use buildings.

Layout

- The Landscape Framework sets out the strategic areas of open space in response to site constraints and to meet the local standards. In addition, proposals should demonstrate how smaller scale community spaces can be incorporated within residential areas to provide functional and attractive spaces close to home. These may incorporate informal or incidental play opportunities or spaces for orchards and outdoor seating areas.
- A clear, rational, and understandable



Strong building enclosure to streets and junctions.



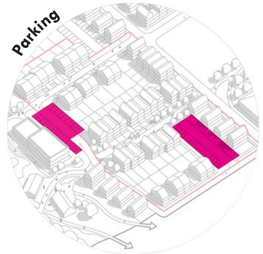
Consistent street frontage and boundary.



Use of gable ends to provide overlooking.

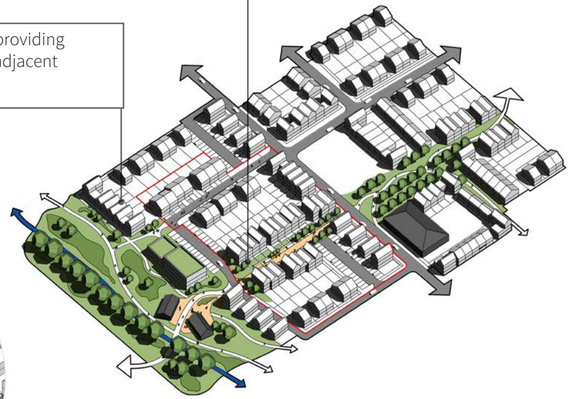
East Cullompton Masterplan SPD

Variety of approaches to parking including areas of communal or more strategic parking for additional cars enabling tertiary streets to have a reduced traffic function.



Streets planned to provide good levels of permeability and lead to strategic areas of open space and mixed use areas to encourage walking and cycling.

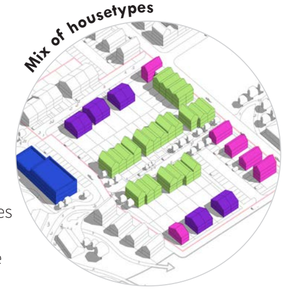
Perimeter block structure providing consistent overlooking of adjacent streets and spaces.





Locally inspired lanes that are accessible, encourage social interaction, that provide good pedestrian and bicycle links to surrounding open spaces and that reduce the dominance of cars.

The housing density at East Cullompton allows for innovative and adaptable homes with a mix of detached, semi detached, terraced and apartments. Sufficient space for front and back gardens.



East Cullompton indicative plot and density study

residential street layout is required which clearly delineates public and private space, avoiding small, inefficient and poorly overlooked spaces. The most effective way of achieving this will be with rational perimeter blocks with buildings clearly facing public spaces. Perimeter blocks are expected to be consistent throughout East Cullompton and should be of a sufficient scale to provide an easily understood structure to residential areas.

- Proposals must demonstrate how the residential block structure responds to the structuring elements of the framework above. For instance, by organising streets with direct links to primary streets, strategic green infrastructure, or mixed-use areas as far as possible to ensure a clear and legible street pattern.
- Homes should be planned to have front gardens of sufficient size to suit the needs of families and vulnerable groups in orientating on leaving and arriving home. Front gardens should be defined in a low wall or hedge in a consistent way along a street.
- Plots should allow appropriate space for the storage of bicycles.
- Building for a Healthy Life should be used as a useful accompanying checklist for application of good urban design principles.

Parking

Dominance of highways and design for parking was cited as one of the critical failures of residential led developments in the Housing Design Audit for England undertaken by the Place Alliance. The Masterplan SPD does not intend to promote one outcome for parking, but proposals are expected to demonstrate how parking can be incorporated without having a detrimental effect on place making or the aspirations for encouraging other means of travel. Street designs should demonstrate how they create an unmistakable Mid Devon character.

- A range of parking solutions will be appropriate but preferred solutions should demonstrate how they will work alongside and encourage active travel as an attractive alternative.
- Innovative solutions to parking will be encouraged that explore incorporation of more strategic provision of parking through shared parking areas, car clubs and mobility hubs described in the Mobility Framework.
- Strategic parking should be provided in a way that avoids expansive rear parking courts that compromise the clear perimeter block structure and definition of public and private space.
- Proposals should demonstrate how the dominance of cars in streets will be avoided.



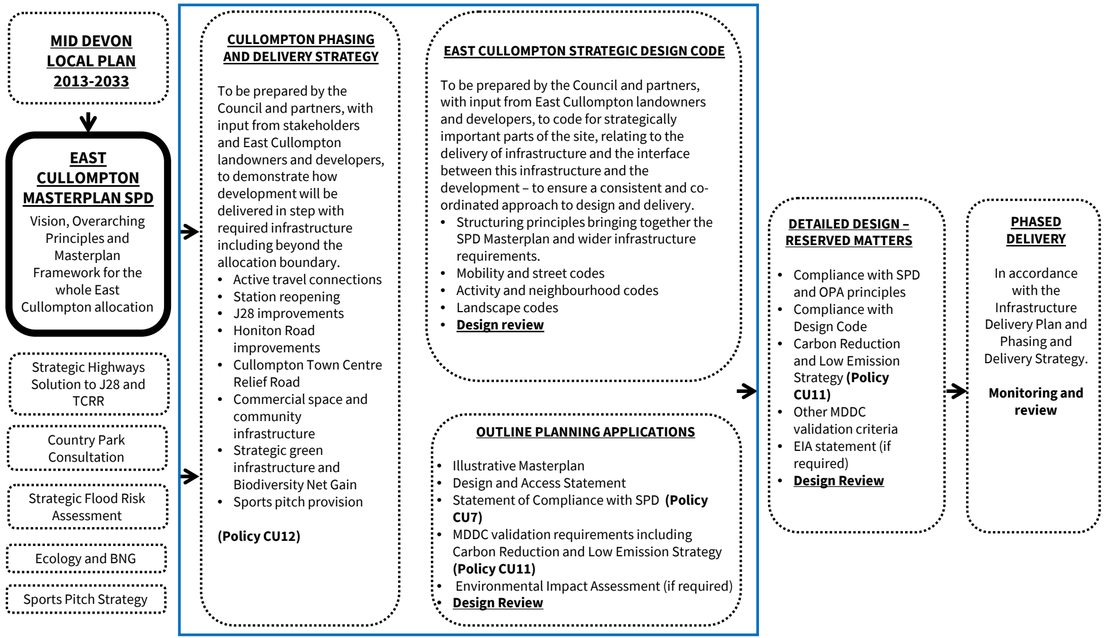
Courtyard parking with planting and overlooking



On plot parking to the side.



On street and on plot parking.



NB: Work within the blue box can be progressed in parallel but the Phasing and Delivery Strategy and Strategic Design Code are to be complete before determination of planning applications.

Planning and Design Process Flow Diagram: The role of the SPD in relation to the Local Plan and the planning application process

East Cullompton Masterplan SPD

5.6 Infrastructure, Delivery and Phasing

Delivery Strategy

It is essential that the development is taken forward in a co-ordinated and cohesive manner to ensure the overall vision and aims of the area can be achieved. Important to the consideration of each planning application or phase will be that it does not prevent or inhibit other areas of the site to be delivered.

Local Plan Policy CU7 requires an agreed phasing strategy to ensure that development and infrastructure come forward in step, minimising the impact of the development, while ensuring it remains viable. Further detail in relation to specific phasing requirements is then set out in Policy CU12 including expectations for the phasing of commercial and housing, green infrastructure, highway improvements, bus service enhancements and transfer of land for the primary school. Phasing will be a critical factor in ensuring place quality and delivering the vision for East Cullompton. An effective phasing strategy will establish the opportunity for patterns of local living and sustainable travel from the outset.

There is more than one landowner and site promoter involved in delivering East Cullompton, and it is important that it should be delivered as a single unified development. How this is achieved in practice will be the subject of further discussions and collaboration between landowners, site promoters, stakeholders and Mid Devon District Council. Following the adoption of this SPD, the Council will work with stakeholders and landowners to prepare a phasing and delivery strategy to inform the sequence of development on the site, capacity of each phase coming forward and the associated infrastructure requirements. It is therefore anticipated that a Phasing and Delivery Strategy document will be produced prior to determination of any planning applications at East Cullompton. The Council recognises that the high infrastructure costs of this site will not solely be funded by the development. The Council will work with its partners and the development industry to secure external funding to ensure the delivery of the necessary infrastructure as necessary.

The Phasing and Delivery Strategy should:

- Achieve the spatial principles set out in this SPD, to create self-sustaining places which are supported by facilities and infrastructure;
- Set out phasing and milestones for delivery;
- Demonstrate delivery of on and off site infrastructure needed for the development in accordance with the agreed phasing and milestones;
- Be collaborative and developed by a joined-up delivery team comprising stakeholders who work together to build the various components of the masterplan;
- Set a clear plan for long term stewardship;
- Achieve the build-out rates needed to deliver the site allocation in the Local Plan, and captures uplifts in land value to resource the features needed to create a sustainable place;
- Be aligned with the phasing set out in the Council's Infrastructure and Delivery Plan and Local Plan Policies and this SPD; and
- Be adaptable, monitored and updated, and include provisions to overcome barriers to delivery.

Strategic Design Code

It is proposed that a strategic design code for East Cullompton is prepared prior to planning applications for the site coming forward. The Design Code will be produced in parallel to the Phasing and Delivery Strategy and future planning applications. The purpose of this is to ensure a coordinated approach to more detailed design considerations with a specific focus on the strategically important aspects of East Cullompton and their relationship to planned infrastructure delivery. It is expected that the Design Code will assist the delivery of the requirements of this SPD and will include the following:

Structuring Principles

- The site wide framework, building on the SPD Masterplan, wider infrastructure requirements including preferred interventions at junction 28 and the Phasing and Delivery Strategy.
- Overarching character statement and design response to the requirements of the SPD.

Street and Mobility Codes

- Details of the infrastructure plan providing links to Cullompton, Junction 28 works and Honiton Road design scheme.
- Design approach to streets, spaces and active travel routes, including typical street sections for primary streets, secondary streets, tertiary streets and active travel routes.
- Strategic approach to provision of mobility hubs, vehicle and cycle parking.

Neighbourhood Codes

- Mixed use hub and commercial area codes setting out layout principles, height, frontage, massing, character and public realm treatment.
- Codes for typical residential block structure, character, boundary treatments, frontage and amenity space.

Landscape Codes

- Codes for key areas of open space including the Blueways, Greenways, Eastern Loop and Community Greens covering size, function, character, materials, planting and layout principles.
- Sustainable urban drainage.
- Planting codes for retaining existing vegetation and new structural planting.
- Codes for public realm treatment.

Ensuring a comprehensive approach

Further measures that could ensure a comprehensive and integrated approach to development will be explored with MDDC and could include:

- The role of a lead / master developer in co-ordinating delivery of site-wide infrastructure, s106 obligations and planning applications, the draw-down and disposal of individual parcels of land and overall marketing and promotion;
- The preparation of an outline planning application for the whole allocation site or a process for the effective co-ordination and phasing of multiple applications that accord with the masterplan framework set out in this SPD;
- A consistent approach to the assessment of transport that starts with the vision for the site and then assesses the impacts on that basis, offsetting any impact with a range of agreed initiatives;
- The potential for community involvement through mechanisms such as a management company or community land trust (CLT).

This SPD has been prepared to assist a comprehensive approach to development and infrastructure across the whole site. A high level Infrastructure Delivery Plan and initial indicative phasing strategy and phasing principles are set out in the following sections to guide more detailed proposals.

East Cullompton Masterplan SPD

Phasing

Policy CU12 requires a phasing strategy for East Cullompton to ensure that development and infrastructure come forward in step. Phasing will be a critical factor in ensuring place quality and delivering the vision for East Cullompton. An effective phasing strategy will establish the opportunity for patterns of local living and sustainable travel from the beginning. In addition to the requirements of Policy CU12, the phasing and delivery strategy will be expected to demonstrate the following:

An immediate step away from a "business as usual", traffic-dominated environment to one that is genuinely pedestrian-friendly and has all the qualities of local living and village life built-in from the beginning building on the principles of the 20 minute place in each phase.

- All phases are required to contribute towards the delivery of mixed-use, walkable communities from the outset. It is expected that phases will be planned around existing, new and expanded mixed-use clusters around established existing places or hubs such as Fordmore Farm including small- scale flexible workspace or workshops , local shops and space for community activities. The loose farmstead-type arrangements of barns and outbuildings of these places is an important aspiration and key to developing a strong place identity and visitor experience that can help to ensure their long term success. These centres should be largely traffic-free and pedestrian priority.
- Priority must also be given to the early establishment of high quality, pedestrian-priority, public spaces in and around these hubs including community greens. This will help reinforce the sense of place and form the focus of village life from the start of the development.
- Street design through all areas of East Cullompton is planned to manage design speeds and avoid dominance of cars. The scale and width of new roads and streets is to be designed to slow or restrict traffic to create the intimate and people-friendly qualities of a village.
- Central to this will be the early transformation of the A373 Honiton Road. Early phases of development will happen on both sides of Honiton Road including development north and south of Fordmore Farm and the building of the primary school and crossing it must be made safe and convenient for everyone. This includes possible narrowing of the carriageway, and measures to improve the quality of the route for all users including pedestrian and cycle crossings.
- Early phases of development must make active travel, and shared transport links to existing workplaces at Kingsmill and include connections into the allocated employment sites.
- Phasing should emphasise a linear east – west orientation of development to ensure priority is always given to ensuring connectivity back to Cullompton and employment areas.
- The early delivery of strategic active travel and Bus/Demand Responsive Transport connections between East Cullompton and Cullompton and beyond the boundaries of the East Cullompton site allocation is also a top priority. These may need to cross a number of land ownerships and across the physical barriers of the Culm, the M5 and the railway. The proposed new station will be a critical destination. The precise location of routes will be dependent upon the continuing work on improvements to Jct 28 and potential new links over the M5.
- Multiple, simultaneous phases may be appropriate where they can demonstrate compliance with the requirements above with development emanating from multiple centres.
- Early delivery of strategic areas of open space with clear walking and cycling routes from areas of development.



East Cullompton Indicative Phase 1 and 2

Phases 1 and 2

Early phases are built around the mixed use community hubs, school site and associated Community Greens to build a sense of place and provide community facilities from the outset.

Complete active travel routes are delivered to connect back to employment areas and Cullompton. Honiton Road improvements delivered.

Commercial areas delivered in parallel.

Opportunities to deliver offsite landscape improvements to the Country Park and River Culm explored.

All infrastructure delivered in line with infrastructure delivery plan and Phasing and Delivery Strategy.

- Mixed use community hubs
- Residential
- School
- Green Infrastructure
- Active travel routes
- Commercial area delivered in parallel
- Country Park and landscape improvements to Culm river side
- Honiton Road improvements
- Access streets

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East Cullompton Masterplan SPD



East Cullompton Subsequent Phases

Subsequent Phases

Further areas of development extend from Fordmore Farm with an east west orientation initially, strengthening links back to Cullompton.

Further areas of development are focussed and expand from around mixed use areas and community hubs.

Complete active travel routes are delivered to connect back to employment areas and Cullompton and between neighbourhoods.

Commercial areas delivered in parallel.

Opportunities to deliver off-site landscape improvements to the Country Park and River Culm explored.

All infrastructure delivered in line with infrastructure delivery plan and Phasing and Delivery Strategy.

- Mixed use community hubs
- Residential
- School
- Green Infrastructure
- Active travel routes
- Commercial area delivered in parallel
- Country Park and landscape improvements to Culm river side
- Honiton Road improvements
- Access streets

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East Cullompton Infrastructure Delivery Requirements

Highways and Accessibility

Infrastructure Requirement	SPD Position	Local Plan Policy	Timing	Mechanism
Capacity improvements at M5 Junction 28	Masterplan designed to work with options for J28 – sets design principles for active travel connections across J28 and safeguarded routes to provide connection	Policy CU8 Policy CU12	Informed by capacity studies completed to assess the impact of the traffic generated from the site - provision likely to be required after first 500 homes completed and delivery of the Town Centre Relief Road	Funded through a combination of developer contributions and public funding
Cullompton Town Centre Relief Road	Masterplan provides design principles and locations for active travel routes and connection to the Town Centre.	Policy CU12 Policy CU20	To be delivered first prior to new homes being completed	Funded through a combination of developer contributions and public funding
Local highway enhancements to ensure any traffic impacts are mitigated	Determined through transport assessment work but to include early works to improve Honiton Road and introduce traffic calming (particularly around Fordmore Farm) which forms a strong place function in the Masterplan.	Policy CU8 Policy CU20	Delivered in Phase 1 (to be defined in the agreed phasing and delivery strategy) and then in step with development	Developer contributions towards identified works.
Reopening Cullompton Railway Station	Active travel links and safeguarded routes across the M5 and J28 to access the railway station shown on Masterplan.	Policy CU8	MDDC intention for the Station to be operational by 2025	Funded through a combination of developer contributions and public funding
Provision of a network of streets linking to the existing highway network	Sets requirements in terms of location and hierarchy of street design and active travel connections.	Policy CU8	Deliver connection to Honiton Road in Phase 1 (to be defined in the agreed phasing and delivery strategy) and then in step with development	Developers to show how facilitating these connections and contribute to improvement works.
Safe and attractive cycle and pedestrian links to and from the town centre	Active travel links and safeguarded routes across the M5 and J28 to access the town centre shown on Masterplan.	Policy CU8	Deliver in early phases and in step with capacity improvements to Junction 28 (to be defined in the agreed phasing and delivery strategy) and then in step with development.	Funded by developer contributions / linked to public funding projects. Developers to demonstrate how proposals link to the active travel routes and principles set in the SPD
Safe and attractive pedestrian and cycle links to Kingsmill Industrial Estate	Early phases of development must make active travel, and shared transport links to existing workplaces at Kingsmill and include connections into the allocated employment sites. SPD sets design requirements for development adjacent to employment sites	Policy CU8	Complete active travel routes delivered to connect back to employment areas and Cullompton town centre in early phases (to be defined in the agreed phasing and delivery strategy).	Delivered by developer
Local and strategic bus service enhancements	The early delivery of strategic active travel and Bus/Demand Responsive Transport connections between East Cullompton and Cullompton and beyond the boundaries of the East Cullompton site allocation is a top priority.	Policy CU8 Policy CU20	Improvements in step with phased housing development	Funded by developer contributions/bus operator

East Cullompton Masterplan SPD

Housing

Infrastructure Requirement	SPD Position	Local Plan Policy	Timing	Mechanism
Affordable Housing - 28% To include 10 gypsy and traveller pitches as a minimum Affordable extra care housing will be required either as part of an extra care development or delivered separately.	Masterplan provide 72 hectares of land proposed for residential use, including market and affordable housing, serviced plots for self builders and gypsy and traveller pitches. Capable of delivering 2,600 homes at an average density of c. 35dph. Assumes limited residential uses will be incorporated in to the mixed use community hubs.	Policy CU7 Policy CU12	Trigger linked to market housing to ensure delivered together. Contribution within each phase of development and phased delivery linked to occupation.	Funded by developer – provision within each phase and to comply with policy target of 28% affordable housing, subject to viability
5% Self Build Plots	-	Policy CU7 Policy CU12	Provide all serviced self-build after strategic highways access to the site completed and operational.	Planning applications will be expected to include the 5% self-build plots and developers to identify plots for private sector purchase

East Cullompton Masterplan SPD

Commercial

Infrastructure Requirement	SPD Position	Local Plan Policy	Timing	Mechanism
20,000 square metres commercial floorspace within the plan period and a further 12,000 post 2033 To include a care home or retirement complex, appropriately scaled retail development and other suitable uses such as offices and a hotel or leisure development	Sets spatial and design principles for the delivery of new commercial floorspace adjacent to existing allocated employment areas and ensuring connectivity through these spaces to wider allocation site as well as to the Town Centre.	Policy CU7 Policy CU12	Provision of commercial development in step with housing, at a rate of at least 1 hectare per 500 occupied dwellings. Provision of active route connecting through these spaces to be safeguarded.	Phased provision of space and delivered by developer and offered to private sector

Community

Infrastructure Requirement	SPD Position	Local Plan Policy	Timing	Mechanism
Primary school (630 place or 2 schools) including early-years provision and children's centre service. SEN provision to be included.	Sets indicative location for the Primary School, as discussed with Devon County Council, to the south of Honiton Road and area of high accessibility, close to the proposed mixed-use areas. Will require early delivery.	Policy CU10 Policy CU12 Policy CU20	Transfer of serviced land at no cost to the County Council together with legal right of access for primary school(s) prior to the first occupation of residential development and contributions towards the build costs phased with development.	Funded by developer contributions
Contributions towards expansion of local secondary education facilities to meet needs arising.	-	Policy CU10 Policy CU20	In step with housing	Funded by developer contributions
Site of 2 hectares for a shopping and community centre, and the provision of a multi-purpose community building for youth, children and other community uses	Expected that phases will be planned around existing, new and expanded mixed-use clusters around established existing places or hubs such as Fordmore Farm including small- scale flexible workspace or workshops, local shops and space for community activities.	Policy CU10 Policy CU20	Delivery of mixed use local centre in Phase 1 (to be defined in the agreed phasing and delivery strategy) to build a sense of place. Then in step with future phases with development focused around community hubs.	Funded and delivered by developer
Contributions towards the expansion or improvement of local library services	-	Policy CU10 Policy CU20	In step with housing	Funded by developer contributions
Contribution towards sporting and leisure facilities	-	Policy CU10 Policy CU20	In step with housing	Funded by developer contributions
Contributions towards a new waste and recycling centre to serve Cullompton	-	Policy CU10 Policy CU20	In step with housing	Funded by developer contributions
Contribution towards expansion of emergency fire and rescue services	-	Policy CU20	In step with housing	Funded by developer contributions
Contribution towards healthcare and wellbeing facilities for Cullompton	-	Policy CU20	In step with housing	Funded by developer contributions

East Cullompton Masterplan SPD

Green Infrastructure

Infrastructure Requirement	SPD Position	Local Plan Policy	Timing	Mechanism
Provision of at least 40 hectares strategic green infrastructure and to deliver biodiversity net gain To include areas of equipped and laid out public open space, totalling: - 0.4 hectares of equipped children's play - 0.12 hectares for teenage facilities - 6 hectares amenity green space - 9 hectares of parks sports and recreation grounds - 1.5 hectares of allotments	Masterplan provides 46 hectares strategic green infrastructure. Masterplan provides space for: - 0.4 hectares of equipped children's play - 0.12 hectares for teenage facilities - 6 hectares amenity green space - 9 hectares of parks sports and recreation grounds - 1.5 hectares of allotments	Policy CU9 Policy CU12 Policy CU20	Early delivery of strategic areas of open space with clear walking and cycling routes from areas of development and delivered in step with development. Public open space provided at a rate of at least 1 hectare per 150 dwellings or phased to deliver a larger area of multi-functional public open space at a suitable stage in the development	Funded / provided by developer
A strategic landscaping and tree planting scheme to mitigate landscape impact, protect the setting of the Blackdown Hills Area of Outstanding Natural Beauty, and enhance biodiversity and the character of development	Sets Landscape Framework to use the existing cues in the landscape to frame interventions ensuring that new development is rooted in the existing qualities of the site and that incoming open spaces simultaneously provide multiple benefits to people, wildlife, and the environment informed by a natural capital approach.	Policy CU9	Scheme to be agreed prior to construction. Phased delivery as development comes forward	Funded / provided by developer. Principles to be agreed in site wide design code.
Appropriate provision of a sewerage system to serve the development and a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water	A high-level drainage strategy has been developed as part of the SPD. The principals of the strategy are to allow for rainwater storage on plot and then the remaining storage provided as a combination of network storage feeding into larger strategic storage elements as shown on Masterplan. Sets further principles in relation to detailed SuDS design.	Policy CU9	SuDS strategy to be developed as part of future planning applications, in accordance with the Strategic Flood Risk Assessment. Phased delivery as development comes forward.	Funded / provided by developers.

Carbon Reduction

Infrastructure Requirement	SPD Position	Local Plan Policy	Timing	Mechanism
Carbon Reduction and Low Emissions Strategies	To set clear principles around carbon reduction and framework as part of each planning application.	Policy CU11	To be submitted with each application for each phase. Phased delivery as development comes forward	Funded / delivered by developers. Also to be considered in Strategic Design Code to allow for spatial implications associated with decarbonisation (e.g. renewable energy solutions on site).



East Cullompton Masterplan SPD

SECTION SIX

GROWING EAST CULLOMPTON

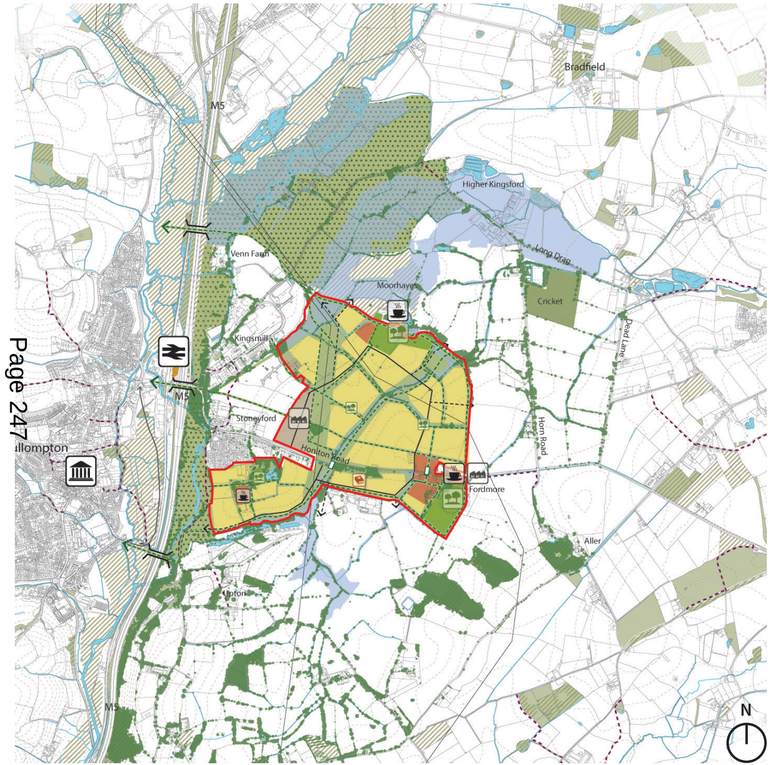
Developing a framework for the wider opportunity area

Activity

Landscape

Mobility

Placemaking



Simplified version of the East Cullompton Allocation Area Masterplan

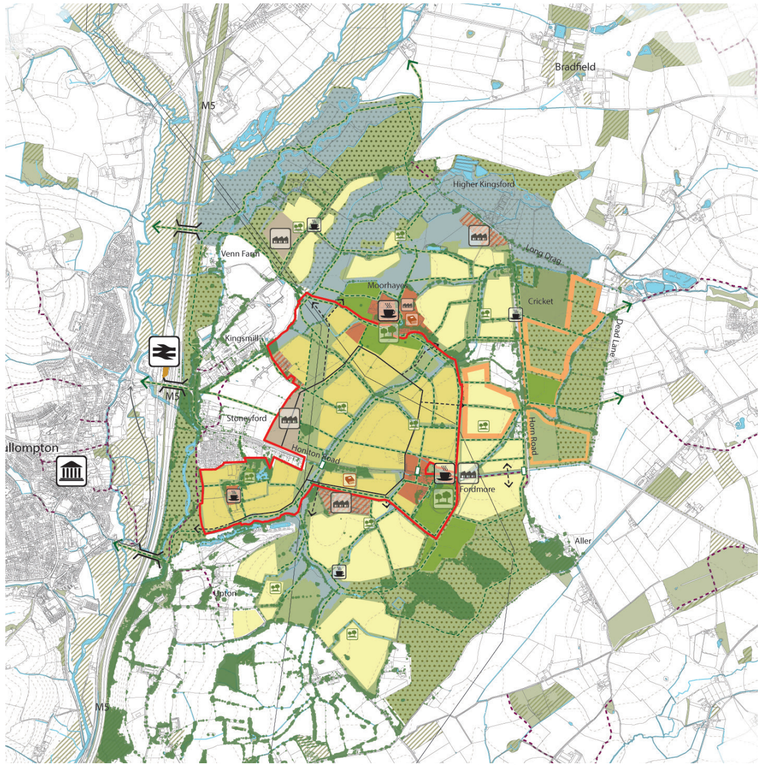
6.1 Developing a framework for the wider opportunity area

The Masterplan SPD for the East Cullompton Allocation has been developed alongside the exploration of a Masterplan which considers opportunities associated with the wider Culm Garden Village project.

The Masterplan and principles described in the previous section set out how the requirements of the Local Plan could be met at East Cullompton. The Masterplan demonstrates how multiple influences can be reconciled and brought together into a comprehensive plan without any further development associated with the wider Garden Village.

This section sets out how the principles defined within the allocation area for East Cullompton could be used to inform a model and framework for further growth to the east of Cullompton should the Garden Village project continue, without setting defined outcomes.

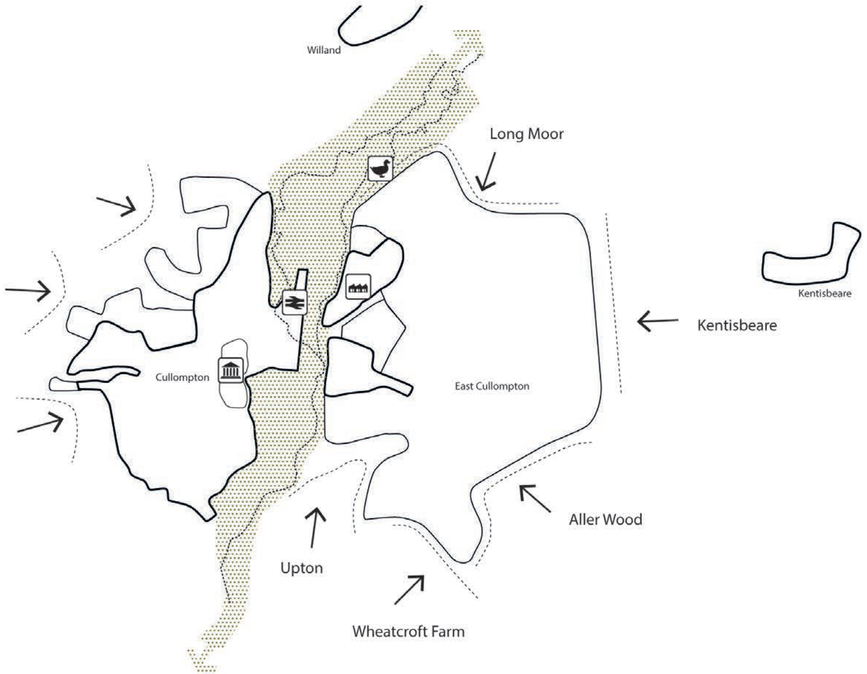
The opportunities set out for the wider Garden Village in this section are intended to provide a commentary and indicative arrangement only, further work will be required to define any proposals definitively through the Local Plan process.



A masterplan framework for the wider Culm Garden Village project

The plans presented in this section show one possible way that East Cullompton could grow in the future following the same placemaking principles established for the allocation area masterplan and is intended to be illustrative only.

- Allocation boundary
- Development area (allocation)
- Wider development area
- Mixed use areas
- Employment areas
- Primary School location
- Potential all through school location
- Strategic green infrastructure
- Indicative Country Park
- Tree canopy
- Neighbourood parks and sport
- PROW
- Active travel routes
- Potential bridge crossings
- Honiton Road crossings
- Main streets
- Surrounding priority habitats
- Local open space
- Community hubs



Influences defining the settlement extent of the Garden Village

Opportunities to explore in the wider Garden Village Masterplan informed by the East Cullompton Masterplan:

Defining the settlement extent

The overall extent of the Garden Village should always link strongly back to existing parts of Cullompton to support the aspiration for new development to feel as though it is a part of one town. The Garden Village should also continue to be organised around a primary infrastructure of open spaces, active travel routes, community hubs, employment and mixed-use community hubs. Residential areas should be planned to form an overall coherent structure of walkable communities clearly linked to the primary infrastructure. Retaining a compact form overall should be a priority to avoid peripheral areas becoming car dominated. Residential areas should continue to be brought forward in step with improved infrastructure, strategic open space and employment space to assist with shift away from a reliance on out-commuting.

The extent of the Garden Village should be driven by the natural capital opportunities defined below, should respect the landscape character of the area and the key influences at the edges of the site including:

Long Moor
An area of historic water meadows in the north that provides the setting for listed buildings and could become part of a large Country Park to serve new and existing parts of Cullompton and nearby villages. Landscape character, areas of flood constraint, priority habitats and opportunities for wetland and woodland planting should frame development extent and character to the north.

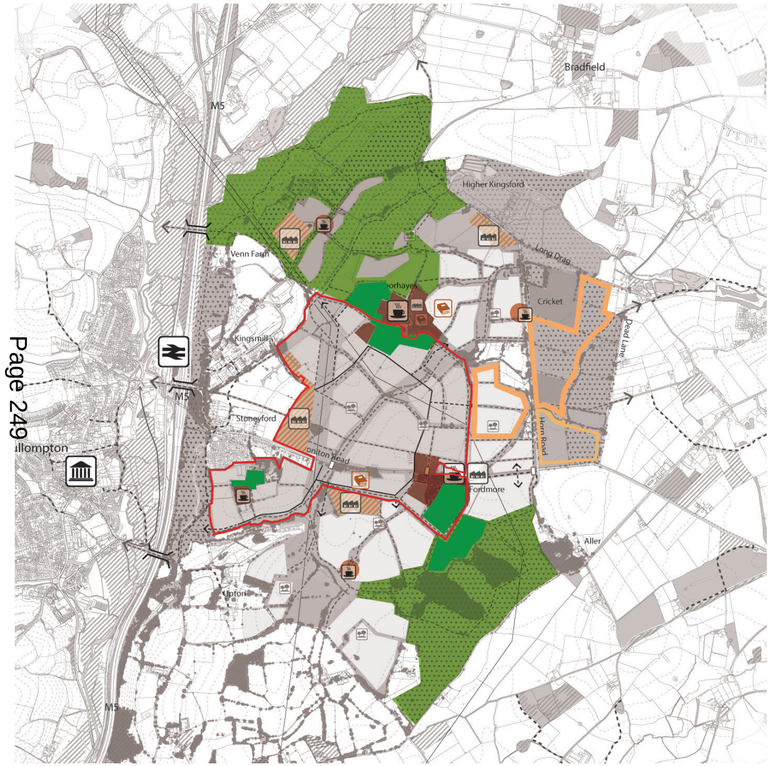
Horn Road
This area is characterised by large rectilinear fields, straight roads with verges and mature hedgerow trees that create a distinct ‘grand avenue’ feel. The objective of maintaining settlement separation from Kentisbeare and an appropriate settlement edge and transition to the open countryside around Horn Road has also been clearly stated through local consultation. The distinct linearity and rectangular layout could inform the identity and character of a new neighbourhood framed around new broadleaf planting, avenues and terraces, allowing retention of important trees and hedgerows to create a strong landscape to the eastern edge of the Garden Village.

Aller Woods
The two ancient woodlands on the hillside to the southeast could be linked through new woodland and grassland areas offering recreation and productive woodland potential that would expand this important habitat. The Garden Village should maintain an appropriate set back from areas of woodland and the local ridge utilising existing lines of vegetation to define the edge of the Garden Village.

Wheatcroft Farm
Development should respect and avoid harming the character of the area around Wheatcroft Farm with an irregular medieval intact field pattern of ancient important hedges, veteran trees, and remnant traditional orchard which offer significant biodiversity and landscape value.

Upton
Use the landform of the local ridge at Upton to enclose the extent of the Garden Village. This is a pronounced and distinct ridge offering views east towards Blackdown Hills and intimate streamside landscape that provides the setting for Upton Lakes holiday lodges.

Residential Capacity
The capacity testing undertaken at this stage utilising these principles suggests a Garden Village of around 5000 homes is possible in this location at an average density of 35-40 dwellings per hectare. The final capacity will be developed through further testing and local consultation.



Land Use opportunities in the Wider Garden Village

Expanding the 20 minute place principle

The Land Use plan shows how the principle of building the community hubs around existing farm buildings could be expanded. The Wider Garden Village could include the further expansion of Fordmore Farm linked to a strategic area of open space or Country Park to the south around existing and extended blocks of woodland. In addition, the area around Moorhayes could be explored as an additional community hub to the north, reducing the walk distances. Moorhayes could mirror Fordmore in identity and form and incorporate similar community, retail and community spaces and also link to the potential Country Park to the north around the River Culm and Ken.

6.2 Activity

Opportunities to explore in the wider Garden Village Masterplan informed by the East Cullompton Masterplan:

Mixed Use Community Hubs

Explore the potential to expand Fordmore Farm centre further to the east along Honiton Road in a way which retains the character of this area.

- Explore the potential for the area around Moorhayes to expand to become more of a community focal point in the north taking equal significance and function to Fordmore in the wider Garden Village.
- The form of Fordmore and Moorhayes could mirror each other to the north and south of Honiton Road providing a mixed-use area of community buildings, workspace and shops in a strong landscape defined by the Community Greens with a direct connection out to the Country Parks to the north and the south.
- Further Community Hubs providing facilities like local shops, community meeting spaces and small scale workspaces should be explored to minimise walking distances anchored to other uses including schools and sports clubs.

Integrating Commercial Space

The original Garden Cities were based on a strong foundation of industry and employment. The TCPA's Garden Village principles include the need for a wide range of jobs within easy commuting distance of homes. Further integration of commercial and workspace will therefore be essential to the successful growth of East Cullompton into a larger Garden Village. Opportunities for new and expanded commercial and employment areas should be explored alongside any plans for a growing community.

- Further expansion and intensification of the industrial uses around Kingsmill and Stoneyford should be explored in the Wider Garden Village particularly in areas of high accessibility to the railway station and junction 28 of the M5. The area immediately around the station may offer some potential for intensification and incorporation of additional space.
- The potential to retain and expand existing employment clusters at Higher Kingsford and Aller Barton should be explored.
- The potential to incorporate further commercial and employment areas at Fordmore and Moorhayes community hubs should be explored.
- The potential to incorporate small scale workspace and work hubs within residential areas, with a particular focus around smaller scale community hubs should be explored.

Schools

The emerging education strategy for the wider Garden Village includes provision of an all-through education campus to include both primary and secondary provision alongside a further separate primary school.

- Plans for the wider Garden Village should determine the most appropriate location for the all-through school demonstrating a priority for walking, cycling and bus links to the school site.
- Potential to co-locate the all-through school with proposed sports clubs to the east of Horn Road should be explored.
- The potential to use the larger, all-through school site to establish an appropriate eastern edge to the Garden Village should be explored, avoiding a 'hard' urban edge to the Garden Village.
- The potential for a second primary school site near Moorhayes should be explored. A school in this location would reduce the walk distances to school sites from residential areas and would also support the creation of a secondary community hub in the area around Moorhayes and the proposed Country Park.



Landscape opportunities in the Wider Garden Village

6.3 Landscape

Opportunities to explore in the wider Garden Village Masterplan informed by the East Cullompton Masterplan:

Blueways

- Blueways could continue to provide a central organising feature of the Garden Village. The three Blueways established within the allocation area could extend through further development areas and beyond into the surrounding landscape. Additional Blueways could be established to the north and the south along additional existing watercourses. Blueways would continue to be a key connecting feature of the area and could provide attractive connections to, and effectively an expansion of, large open spaces and country parks to the edges of the Garden Village.
- Explore the potential to create a new watercourse to the north of Moorhayes providing a better defined water and drainage channels potentially reducing flood risk as well as providing a key placemaking feature in an expanding community hub at Moorhayes.
- Use the leat as a key placemaking and connecting feature through the larger Garden Village site.
- Potential for incorporating large wetlands or waterbodies could be explored in the County Park to the north of Moorhayes and in the low lying basin between Upton and Aller Barton.

Greenways and Loops

- The principle of the Greenways could continue, expanding connections and attractive active travel routes across the larger Garden Village area.
- The Eastern Loop established within the allocation area can become a green infrastructure corridor within the extended settlement area of the Garden Village with development on either side. A new Eastern Loop could be defined around the edge of the new Garden Village. The extended Eastern Loop can set the landscape edge of the Garden Village establishing the relationship to Kentisbeare and views of the Garden Village from the surrounding landscape.
- An extended Eastern Loop can provide a recreational route around the edge of the Garden Village, connecting to the planned Country Parks and providing interaction and potential connectivity into the open countryside.

Community Greens

- The Community Greens established at Fordmore and Moorhayes, at the edge of the allocation boundary could expand into the wider Garden Village area to serve a growing community.
- The Community Greens established at Fordmore and Moorhayes could be planned to link directly into the proposed County Park areas to the north and the south as part of a much larger open space resource.
- Additional, smaller Community Greens can be established as part of additional mixed-use areas within the wider Garden Village opportunity area providing local open space.
- Community Greens can continue to create a rural character and strong landscape structure as a key part of mixed use community hubs.

Sports Hub

- There is an opportunity in the wider Garden Village area to establish a sports hub that consolidates relocated sports clubs with playing pitches required as a result of the growing community. The sports hub would be located to the east of Horn Road around the proposed cricket club. Sports pitches would provide a good fit with the linearity of this landscape which is also relatively flat.
- A primary sports hub could work alongside smaller sports facilities within the Community Greens.
- Opportunities for co-locating the all-through school with the sports hub should also be explored to take advantage of the potential to share facilities.

Opportunities to explore in the wider Garden Village Masterplan informed by the East Cullompton Masterplan:

Country Parks

- In addition to the Proposed Country Park planned to the north around the River Culm, there is potential to establish a second Country Park to the South around the blocks of woodland near Aller. This Park could have a different character to the lower lying riverside park to the north with areas of parkland and additional areas of woodland planting connecting woodland blocks together.
- Explore the potential for other areas of strategic open space such as the Blueways and Greenways to connect in to the Country Parks to ensure habitat connectivity and to bring the benefit of naturalistic open space into development areas and throughout the Garden Village.

Flooding and Drainage

- The overall aim for the wider opportunity area will be to continue the main principles of the drainage strategy for the allocation area.
- Particularly in the north and south of the wider opportunity area, the ground levels are flatter than the allocation area and therefore larger single attenuation basins / ponds will be possible which can aid with development of strategic drainage areas and raises potential for permanent wet features such as water bodies and wetlands.
- Management of development levels, drainage and surface water flow paths will be key elements for managing flood risk in these areas which require agreement with the Environment Agency regarding how these features can interact with the existing floodplains and flow routes.

Natural Capital

Carbon

- Retain existing woodland, trees and hedges for carbon storage.
- Minimise disruption to soil from beneath hedges and trees and if disturbed, store as carefully as possible.
- Habitat improvements for increased carbon storage. Establish new areas of broadleaf woodland, wetland and grasslands with native species. The area marked **(1)** is identified as an area with particularly high potential for increased tree cover.

Habitats Grassland Features

- Retain existing grassland habitats where possible.
- Establish new grasslands including north south connectivity in area marked **(6)**.
- Incorporate grasslands, alongside additional tree planting, around existing woodland to the south in area marked **(2)** to enhance connectivity, biodiversity and carbon storage.

Habitats Woodland Features

- Retain existing features.
- Establish new areas of woodland planting including to the north in area marked **(3)**. Woodland features here would link the woodlands around Kingsmill to those around Bradfield. There is a synergy here with grassland and wetland networks, so woodland pasture, or marshy grassland would be beneficial.

Habitats Wetland Features

- Retain existing features.
- The vast majority of the area is an opportunity for new wetland features. Establishment / enhancement of wetland features in the north would help make the existing network bigger, better, and more joined up, whilst in the south would help in establishing new corridors.
- The area marked **(5)** is especially good for establishing wetland adjacent to existing wetland habitats, as part of the proposed Country Park. There is a synergy here with a potential for woodland creation, and also grassland creation as well. This means that wet woodland or wet grassland features would benefit these networks as well.
- Wetland features in area marked **(4)** would link the wetlands around Kingsmill to those around Higher Kingsford. There is a synergy here also with a potential for woodland creation, and also grassland creation as well. This area co-insides with the potential creation of a new watercourse to reduce flood risk.

Natural Flood Management

- Position SUDS features in areas of high infiltration and storage adjacent to existing watercourses.
- Include native deciduous tree. In particular, planting in areas marked **(A)** will benefit natural flood management and biodiversity of the area.

Water Quality

- Retain existing hedges and trees to break flow pathways to streams.
- Enhancing areas marked **(B)** with additional planting of native species of hedgerow and woodland would help break the connections between the land and the water courses to improve water quality.
- Establish native habitats and SUDS in area marked **(7)** to take advantage of soil conditions.

Urban cooling

Retain existing trees and woodland and establish new tree planting and areas of woodland.



Natural Capital and Ecosystem Services opportunities in the Wider Garden Village

East Cullompton Masterplan SPD



Mobility opportunities in the Wider Garden Village

6.4 Mobility

Opportunities to explore in the wider Garden Village Masterplan informed by the East Cullompton Masterplan:

Active Travel

- Further active travel crossings of the M5 to the north, in addition to the central and southern crossing.
- The principle of a regular grid of active travel routes utilising Blueways and Greenways can be applied to the wider Garden Village opportunity. Additional routes should be planned that demonstrate connectivity to key destinations and how they can offer priority over use of private cars.
- Active travel routes can be planned to connect into existing public rights of way around Kentisbeare. Potential for an improved route to Willand should also be explored.

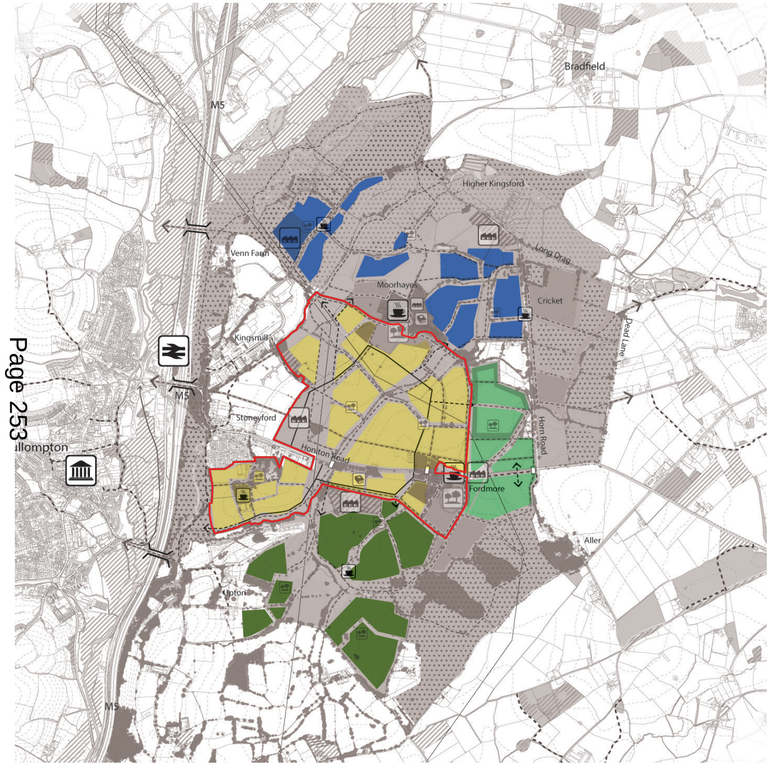
Street Hierarchy

- The Street hierarchy principles established as part of the East Cullompton allocation area can be applied to the Wider Garden Village.
- Proposals for the wider Garden Village should demonstrate how the primary street network can be effectively expanded to serve the larger development area without compromising the need for a clearly understood primary street network.
- Any improvements to Honiton Road should expand into the wider Garden Village area with additional crossings established to coincide with active travel routes.

Mobility Solutions

The mobility strategy for the site should evolve to embrace the innovation, new technology and new mobility solutions that may emerge as East Cullompton grows. A successful larger settlement can support a broader range of services and therefore greater levels of self containment. The mobility strategy should continue to be driven by the vision and issues such as parking standards and timing of infrastructure kept under review to support the overarching principles at East Cullompton.

Mobility hubs and public transport should continue to be planned following the principles from the allocation with a focus on key areas of activity and ensuring that more peripheral areas of the settlement, with longest walk distances, are well served.



Character Areas in the Wider Garden Village

LEGEND:

- Allocation boundary
- Central Character Area
- Woodland Character Area
- Avenues Character Area
- Water Meadows Character Area

N

6.5 Placemaking

Opportunities to explore in the wider Garden Village Masterplan informed by the East Cullompton Masterplan:

The placemaking and phasing principles established as part of the East Cullompton allocation area should continue to influence the character of the wider Garden Village with a review of lessons learned from early phases.

The potential to use the following influences to determine the layout of streets, spaces, and development parcels as well as materials and planting should be explored. These features can be used to define a four distinctive character areas to the Garden Village.

- The central character area of East Cullompton framed around the central Blueways and Fordmore Farm.
- The Water Meadows character area formed around the influence of lower lying, flatter areas to the north close to the River Culm, the Country Park and the greater presence of water.
- The Avenues character area framed around the longer, straight lanes, avenues and field patterns around Horn Road and Dead Lane emphasised in development areas to the east.
- The Woodland Character Area where the large blocks of woodland and the presence of mature trees in the area to the south of Fordmore Farm could define the character of development parcels and open spaces to the south.



Additional character influences in the wider Garden Village area

Consultee responses

1. Cullompton Town Council (page 1)
2. Kentisbeare Parish Council (page 2)
3. Bradninch Town Council (page 3)
4. Devon County Council (page 3)
5. National Highways (page 10)
6. Environment Agency (page 13)
7. Natural England (page 15)
8. Sport England (page 16)
9. Blackdown Hills AONB (page 19)
10. Network Rail (page 20)
11. National Grid (page 22)

1. Cullompton Town Council

Here is the formal response from Cullompton Town Council regarding the consultation on the East Cullompton SPD Masterplan:

Resolved that the council's formal response to the East Cullompton Urban Extension Supplementary Planning Document consultation is as follows:

- The proposal allocated in the latest revision of the Local Plan, although less than half the aspiration, is broadly supported.
- Detailed observations include:
    - The need, whilst encouraging the use of low carbon transport, not to alienate car users. In addition, bus stops without buses to stop at them are largely useless particularly in light of the recent reduction of services by Stagecoach. Subsidising these services in the short term is acceptable whilst the number of occupied dwellings increases but there needs to be a strategic plan in place to make services in and around this proposal sustainable in the long term.
    - That, whilst there are many thousands of new dwellings in progress or proposed, not just in Mid Devon but across the County and South West region, there is little or no provision made to supply water to these new dwellings in the form of new reservoir capacity.
    - That the lessons of Swallow Way (though Kingfisher Reach) must be learned and not repeated.
    - That, whilst the Garden Village Initiative will create a very significant mixed-use development, it should be seen as part of Cullompton with a Parish Boundary review if necessary.
    - That schools, surgeries and community facilities (including road infrastructure) should be delivered in the early phases.
    - Consideration should be given to providing the provision of convalescent care beds in the vicinity of the proposed care home/GP surgery in order to go some way to alleviating "bed blocking" in the NHS.
    - That modifications to Honiton Road may be necessary to increase capacity along the extent of the East Cullompton Urban Extension/Garden Village Initiative.

- That significant improvements and additions to the M5 J27/J28/J29 corridor infrastructure will be required as the current J28 is at capacity now without several thousands of additional vehicles attempting to access it.
- That it makes the reopening of the railway stations a more urgent requirement.
- The size of industrial units and the type of industry, whilst understanding that there will be some market forces, needs to be carefully considered as there is a shortfall of micro and small units in the district making start-up business difficult. Retail also needs to be considered both in the commercial allocation and within the development as a whole.
- The Cullompton Neighbourhood Plan should be fully complied with in the design of any development proposals.
- The Town Council will actively oppose any proposal for dwellings at East Cullompton before the Eastern Relief Road is delivered and that the issues surrounding the capacity of Junction 28 of the M5 are resolved.
- The absence of waste water treatment facilities is a concern as the existing is at capacity.
- There is concern that there is little or no retail; at the start of the East Cullompton vision process, there was a proposal for a retail park at the south west of the allocated site that appears to be absent from the Masterplan Supplementary Planning Document.
- Small retail units (convenience store type) will be required to provide necessities and to avoid unnecessary car journeys to purchase, for example, milk or bread.

2. Kentisbeare Parish Council

Please see below the response from Kentisbeare Parish Council in respect of the East Cullompton Masterplan SPD consultation.

Kentisbeare Parish Council welcomes the explicit recognition of our village remaining “clearly separate from Cullompton in terms of identity and village setting” (p.51).

We do have a number of concerns that we would like to highlight -

- We believe that the process we were promised was a fully coordinated masterplan for the broader Garden Village. The two-stage nature of the process that is now in train involves detailed approval of the East Cullompton allocation that is part of the existing Local Plan and an outline of thoughts about the longer term possibilities for the wider Garden Village. One consequence of this is that facilities that are only required once a certain number of houses have been built may well be located at the furthest extreme of the Garden Village, whereas a larger scale masterplan would be likely to site them more centrally. Obvious examples are the proposed secondary school and the sports clubs. We would suggest that more detailed planning is undertaken before the East Cullompton Masterplan is signed off.
- Public consultation to date and dialogue between Kentisbeare Parish Council and MDDC have consistently opposed any development to the east of Horn Road. The Cricket Club has been granted planning permission and so that must now be excepted. The references to "relocated sports clubs to the east of Horn Road" (4.10) and the "potential to co-locate the all-through school with proposed sports clubs to the east of Horn Road should be explored" (6.2) seem to ignore this consultation. We would hope that MDDC remains true to its stated desire to develop the Garden Village in conjunction with local communities and their wishes.

- The document refers to the area around Horn Road as potentially being "a new neighbourhood framed around new broadleaf planting, avenues and terraces... to create a strong landscape to the eastern edge of the Garden Village." (6.1). We would hope that only planting would be to the east of Horn Road with any new neighbourhood to the west to be consistent with the above. Topographically the east of Horn Road is high and visible ground on either side of the A373.
- In addition, we are concerned about a number of the impacts of the growth in traffic resulting from East Cullompton and the broader Garden Village. The volume of traffic on the A373 has increased noticeably in the last few years. This seems to have been driven by the considerable development elsewhere in Cullompton and the resultant issues at the motorway junction. We believe that the limit of 500 houses to be built in East Cullompton prior to a strategic motorway intervention now looks too high given the approval of recent development applications elsewhere around Cullompton and that it should be revised downwards.
- We are also concerned about the A373 to the east of the Garden Village. It is extremely narrow at various points before Honiton and significant blockages are occurring on a much more regular basis. Getting out on to the road from the lanes that lead off it has also become significantly more difficult. Post Cross is a prime example. One of the concerns we have is that that any significant increase in issues on the A373 is likely to manifest itself as an increase in rat-running through the area to the east of the M5, this will result in more traffic on inappropriate routes through our Parish. We therefore urge a more coordinated approach to address the present and future issues on the A373 to Honiton before development starts.

3. Bradninch Town Council

Resolved to submit the following comments with regards: any further development in Cullompton would require a relief road to be built, along with improvements to the existing motorway junction. Also, consideration should be given to the impact on the river Culm, due to the increased sewerage from new developments, to ensure that further pollution could be avoided.

4. Devon County Council

Thank you for the opportunity to comment on the East Cullompton Masterplan Supplementary Planning Document Consultation. The County Council welcomes this as an insightful consultation and a positive step towards delivering sustainable development at East Cullompton in line with garden village principles. The County Council welcomes the inclusion of the 20-minute place principle and emphasis on net zero.

Appendix A attached provides the County Council's detailed comments. The County Council would be pleased to discuss the comments raised and actions arising in more detail. We look forward to continuing our work with you as the Masterplan progresses.

East Cullompton Masterplan Supplementary Planning Document Consultation

Appendix A:

Item	Issue and reference point	Comments
1 Introduction		
1.1	Background	DCC welcomes the priority that the plan has placed on responding to the climate emergency and nature recovery.
2 Vision		
2.2	Overarching principles	The inclusion of 'Use innovative and modern methods of construction to minimise waste and reduce pollution' under 'Planet' is welcomed. However, this could be expanded to ensure waste is minimised and considered during the design and layout of a development, for example, to reduce inert material exported off site. Further emphasis should be put on the phrase 'reduce carbon emissions'. The NPPF uses the phrase 'contribute to radical reductions in greenhouse gas emissions'.
3 Influences		
3.1	Policy context	The Devon Waste Plan also forms part of the Development Plan for the area. This should be included to ensure the principles of sustainable waste management are considered throughout the planning process. The following is recommended: ***Devon Waste Plan*** *The Devon Waste Plan for the period 2011-2031 was adopted in December 2014 and forms part of the Development Plan for the area. The key policy from this plan is Policy W4: Waste Prevention. This policy looks for sustainable construction, procurement and waste management in Devon to achieve a reduction in the waste generated through all forms of development.* *Major development is required to include a Waste Audit Statement demonstrating how the demolition, construction and operational phases of the development will minimise the generation of waste and provide management of waste in accordance with the waste hierarchy (from preventing waste, re-use, recycling through to the final option of disposal of waste).* Reference could also be made to the Waste Management and Infrastructure SPD adopted in July 2015 which provides guidance to applicants on how to implement Policy W4: Waste Prevention of the Devon Waste Plan. DCC would welcome reference to Devon's Joint Health and Wellbeing Strategy 2020 – 2025 within the masterplan.

3.2	Context & Carbon Emission Assessment Framework	The Devon Carbon Plan is now live. The Carbon Emissions Assessment Framework is ambitious, and it's particularly good to see the inclusion of embodied carbon in the tool.
3.2	Broad Carbon Reduction Approach by Source (Table)	DCC welcomes the carbon reduction principles set out within the Masterplan and the emphasis on achieving net zero. The table is clear on how low-carbon aspects will be incorporated into the Plan. The need for renewable and green energy sources will be key to the long-term sustainability of the new town. District heating could be a major contribution to reducing carbon. Strong digital connectivity should be included in the table as a Substitute Approach to achieve reduced carbon emissions. DCC recommends that mention is made to preventing inert material being exported from site through design. This would avoid emissions.
4 Understanding The Place		
4.4	Natural Flood Management	Natural Flood Management might not entirely prevent flooding, but can reduce flooding.
4.4	Air Quality	Air quality is the largest environmental health risk in the UK. It shortens lives and contributes to chronic illness. Increased traffic is likely to increase vehicular emissions, which may impact on Air Quality. Although air quality assessments have been carried out, they will need to be monitored at regular intervals through the construction phases and afterwards.
4.6	Heritage	Existing Policy CU7 requires further archaeological investigation to inform mitigation, as development progresses. This will need to be used to identify opportunities to positively influence the detail of design/layout as planning applications come forward, as well as to inform mitigation for the loss of any undesignated archaeological assets. The attention given to the importance of water/water management in shaping Cullompton and the new community is welcome.
4.8	Access and Mobility	It should be noted that Honiton Road is an A road so downgrading this and reducing the speed limit are unlikely to be achievable. Crossings of this road are going to be important given this road passes through the middle of the development but the strategic nature of the road cannot be lost. A choice of travel methods integrating with public transport will be required. The station should be equipped with secure safe cycle storage, and provision for charging facilities for electric bikes to encourage active travel. If the aim is to reduce car journeys, this needs to be supported by adequate and reliable bus services.

4.10	Opportunities Plan	DCC endorses the need for travel crossings over the trainline and motorway and would want them to be implemented as early in the phasing as possible. Suicide Prevention should be a priority for a bridge crossing in a location of this nature.
5 Masterplan Framework		
5.2	Mixed Use Community Hubs	Allocation of parking spaces within the new development will need to be carefully managed and prioritised. Consideration will be needed for inclusive parking for those with disabilities and visiting care workers, who should have priority spaces to prevent delays in support being offered to the most vulnerable people. DCC supports the restriction of hot food takeaways, particularly within 400 meters of a school and limiting the number of takeaways in any given location.
5.2	School site	In its role as Local Education Authority, Devon supports the proposals as set out in the consultation. The preference will be for a single primary school site to support a 630 place primary school with early years provision as this will be a more efficient model to manage the growth of the development. The proposed location of the school, adjacent to an existing road network and utilities, will ensure the school can be delivered early in the development as there is insufficient primary capacity to meet the needs of the development. Therefore, delivery of a serviced site and capital funding will be critical prior to commencement of development.
5.2	Integrating employment	Further information is required to understand the evidence in place which underpin the assumptions made for the scale, mix and phasing of commercial industrial and workspace development and what the planned mix of uses will be. Business space demand cannot rely on 2018/19 projections (e.g. office space demand is now a lot lower, often leading to consolidation of office spaces). However, demand for some manufacturing and especially distribution and storage space is higher than for offices. Further information is also required in relation to the economic growth (GVA/GDP increase) assumptions. The Bank of England has recently updated its economic growth forecasts and the OBR will be publishing its findings later in November 2022 that we expect to better reflect a new economic situation. The ability to intelligently phase commercial business and workspace development is key, to reflect both real-world demand and balance this with aspirations for the community. There needs to be the ability to regularly review any mix of employment uses, maintaining the aspirational tenet of the plan, but adapting the mix of uses to reflect changes to demand patterns in what since 2019 has become a very rapidly changing economic situation, globally, regionally and locally. **Retail** Further information is required to set out the assumptions around retail space in the new community, how this reflects demand and how this will interact with the retail offer in both Cullompton and other nearby communities, including any new planned retail offers within Mid Devon.

		There has in very recent years been a trend towards a need for less retail space overall, however, there has also been a shift whereby smaller towns that have a characterful and distinctive mix of an attractive environment, a variety of things to do, a good mix and number of essential services and homes located close to retail and a good mix smaller units and independent retailers alongside a handful of chain stores have tended to perform much better (e.g. Totnes, Sidmouth, and to some extent Crediton and Okehampton). Cullompton's existing retail core tends to perform less well than might be expected of a town of its size, function and historic character. Regeneration of the existing Cullompton town centre should form a key objective of an urban extension, or new community in East Cullompton. **Work locations and commuter patterns** Further information is required in relation to the assumptions made about where people who live in the new community might work and where people who work in the new community might live taking into account a new and emerging reality about people's travel to work patterns in the Cullompton and Mid Devon areas. This will vary by sector of employment. There have been shifts, especially in those working in office-based employment, towards more flexible working, but with some days in a central workplace, especially since 2020. This has also meant that for some higher paid employment the area of search for employment has widened from outside of existing Travel to Work Areas (e.g. what are the assumptions around people in Mid Devon now having a nominal workplace location in Bristol, Plymouth, or London as well as Exeter, or Taunton as previously). The location of the existing Tiverton Parkway station and M5 within the District, plus A303 being nearby will likely have some additional impact on the attractiveness of this as an option in Mid Devon. In addition, what assumptions are made about temporary impacts on working patterns from Hinkley Point C, which draws a lot of people from a very wide area? It is likely that Travel to Work patterns vary significantly by sector and rate of pay.
5.2	Residential	The provision of affordable homes within the development is welcome, there should be a mixture of rents and purchase options. DCC would like to see other housing options to be considered such as provision of co-living accommodation blocks for the use of professional single people these are self-contained one-bedroom units with kitchenettes and other shared facilities. Thought should also be given for adaptable homes. We have an ageing population and to reduce burden on expensive care homes having the potential for annexes on private properties or internal ability to reconfigure space needs to be factored in. Wheelchair accessible homes should be included within the housing designs to be fully inclusive and giving options for a range of clients.
5.2	Powerlines	DCC agrees that the powerlines should be moved underground, but if this is not possible the space below them should be used for parkland rather than residential housing.
5.3	Landscape	DCC welcomes the amount of green infrastructure and open space to be provided by this development, which will provide for natural play, active recreation, healthy living, and help to combat climate change. The biodiversity of the area (including hedges and trees) needs to be protected and retained where possible.

5.3	The Blueways	Blueways will be a key feature, time spent outdoors in the natural environment is positive for mental health and wellbeing. Improving the existing river crossings is a way of working with the natural beauty of the area, giving a defined sense of "place".
5.3	Crossing points and fords	Fords should not be prioritised. If fords are proposed, then they will need to be carefully considered (e.g. consideration of design, location, road type, etc.). These features can cause obstructions to flows. Fords will need to be drained effectively so that pollutants are not washed into the watercourse.
5.3	Community Greens	The sports pitches should be open access for use for the whole community and not just the schools/private clubs. Consideration should be given to lighting the pathways and sports areas to make them a safe place at night. Allotments are important for the supply of healthy local food and working on an allotment has been proven to be beneficial for health and wellbeing. It would be welcomed to see the completion of some of the allotments in-line with the phased completion of the first homes. The community orchards will be a resource for the village, but these need to be managed and maintained.
5.4	Junction 28	DCC is aware that any walking / cycling routes over the M5 are linked to the J28 improvement options so a specific route cannot be defined at present. However, this needs to be included in the phasing approach so it is delivered early within the development. This will be especially important before the local centre and facilities on the eastern side are established as initial dwellings will be heavily reliant on the existing town facilities and connections across the M5 to them.
5.4	Active travel & Street Hierarchy	It is good to see that SuDS are referenced within active travel and the street hierarchy. Permeable paving could be used as well as rain gardens, swale, filter trenches. It is great to see SuDS being encouraged along streets. DCC welcomes the promotion of sustainable travel, particularly active travel including walking, cycling and public transport. Walking and cycling routes need to be delivered early in the phasing of the new community. This will help support the aims of increasing sustainable travel modes and reducing the reliance on the private car. Taking this approach as part of the planning applications is supported but assumptions need to be realistic and achievable to satisfy all parties involved. The cycle routes proposed around the town are welcome but these need to be linked to a wider cycling infrastructure for residents to be able to safely move to destinations further afield. The surface of the pedestrian/cycle paths should be fully accessible and suitable for wheelchairs and pushchairs.

5.4	Honiton Road	DCC fully supports the 20-minute neighbourhoods idea but is not sure how this will be achieved without the early delivery of high quality walking and cycling routes between the CGV and existing Cullompton, before there are the resources built at the new community. The footway connection along Honiton Road is not complete and some areas are on private land outside the control of the CGV landowners. The whole length would need upgrading to a pedestrian/cycle footway and it is questionable whether this should be next to the busy A373 or whether a completely segregated route elsewhere should be provided instead (note comments on Honiton Road below). The other routes show the footway/cycle way to be through Honiton Road Industrial Estate which is also 3rd party land and only has a PROW connection to Honiton Road which may not be able to be upgraded.
5.4	Mobility Hubs	DCC welcomes the proposal for mobility hubs and for co-bikes and car share schemes. Further information is required in relation to what these will look like (e.g. cycle parking, direct links to the sustainable travel routes from mobility hubs is essential).
5.5	Placemaking	Access to greenspace is a good way to support good physical and mental health. The design of homes needs to consider the pavement space and access to homes for people with mobility vehicles.
5.5	Parking	The amount of parking provided will have a heavy influence on the reliance on private car for travel. However, sufficient parking should be provided to prevent parking on-street. Consideration of cycle parking and electric vehicle charging needs to be made and included in the Masterplan. Rear parking courts should be avoided unless well-lit and good access is provided and they are overlooked.
5.6	Planning and Design Process Flow Diagram	Does surface water management form part of infrastructure delivery?
5.6	Strategic Design Code	The proposed Strategic Design Code should help to promote good housing design. Poor housing conditions are associated with poorer health outcomes, increased risk of circulatory and respiratory diseases, and mental ill health. Indoor air quality needs consideration with improvements in construction materials used. Good home design, for example adequate storage which include storage for household waste bins is essential to prevent odours from the waste or the potential of rat or vermin infestations.

5. National Highways

Thank you for consulting us on the above document. It is a positive step in providing guidance on the design, development and delivery of site allocation CU7 (East Cullompton) of the Mid Devon Local Plan Review (adopted July 2020). Policy CU7 proposes the allocation of a site of 160 hectares to the east of Junction 28 of the M5 for the development of the initial new settlement (1,750 houses to 2033, with at least a further 850 dwellings to follow). It is also recognised that the site was awarded Garden Village status in 2017, with the potential to deliver up to 5,000 new homes. The Supplementary Planning Document (SPD) is rightly cognisant of this planned future growth of the East Cullompton allocation/Garden Village, which must follow the same principles and policies to ensure sustainable development.

National Highways are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which at Cullompton includes Junction 28 of the M5. The junction can experience congestion during the morning and evening periods and remains a constraint despite previous improvements in 2015. The combination of North West Cullompton strategic allocation (1,350 dwellings and 10,000sqm of commercial floorspace), the East Cullompton allocation and other smaller allocations have been identified to impact on the safe and efficient operation of the SRN. As recognised in the Masterplan, delivery of a transport solution at Junction 28 to enable future growth at Cullompton is necessary, as set out in the most recently adopted Mid Devon Local Plan (July 2020). It is noted that the Masterplan SPD indicates that capacity improvements at Junction 28 are likely to be required after the first 500 homes are completed, to be clear, this is subject to prior delivery of the Town Centre Relief Road[1]. We understand that Devon County Council are currently undertaking traffic modelling work to demonstrate the suitability of this development threshold, and National Highways will need to be satisfied that early development ahead of infrastructure provision does not give rise to an unacceptable safety impact for the SRN.

We support the carbon reduction principles of the draft Masterplan, particularly noting the 'in-use transport' measures that are expected to be considered by developers. We would expect Mid Devon District Council to enforce any commitment to deliver carbon reduction generated by private car travel. National Highways, like Mid Devon District Council, has made commitments to reduce our carbon impacts. Wherever possible, we support plans to replace vehicular journeys with active travel modes, both reducing carbon and managing down demand on the SRN. It is important to stress that our license with DfT requires us to focus on the safe and effective operation of the SRN and this cannot be compromised for sustainable travel initiatives.

The ambition of the Masterplan regarding improved sustainable travel modes and appropriate site phasing, to reduce the need to travel by private car, are endorsed. This has the desired potential to reduce the need for network peak hour private car trips on the SRN. Delivery of sustainable transport options early in a development are key in nurturing habits of residents to use sustainable transport modes. However, this may have implications for the existing Junction 28 layout and facilities, particularly through increased demand for active travel to the proposed reopened Cullompton train station, with the motorway overbridge currently forming the principal access route between East Cullompton and the proposed rail station site. We are keen to stress that Cullompton currently generates significant out-commuting with a reliance on the private car. Therefore, a step change in travel behaviour and facilities is required in this development to achieve the sustainability

[1] Agreed by MDDC, DCC and NH within the Mid Devon Local Plan Review 2013-2033 Statement of Common Ground for 'Cullompton Infrastructure Improvement – Highways' on 12/02/2019 - https://www.middevon.gov.uk/media/346857/scg10-highways-cullompton-policies-s11-cu1-cu21-secure.pdf

principles aspired to as a Garden Village, and highway capacity improvements will still be required to accommodate residual car-borne travel demands. We anticipate further work/evidence in how the sustainability aspirations of the Masterplan are ensured in site delivery and would welcome a meeting to ensure that this vision is deliverable in terms of transport impacts. We would expect Mid Devon District Council to ensure that they enforce any commitment to reduce private car travel for the life of the development.

One of the core principles in the SPD to achieve sustainability of the development is delivery of a 'twenty-minute place'. It is presumed this means seeking to achieve an 800-metre walkable catchment, or a 10-minute walk to your destination, and 10 minutes back home. The SPD could be clearer in defining the 'twenty-minute place' approach to ensure meaningful achievement of this principle.

We agree with the statement within Section 4.8 that options to improve Junction 28 are under discussion with Mid Devon District Council, Devon County Council and National Highways at the time of writing. Depending on the timetable for the adoption of this document, we anticipate this SPD will be updated to include updates/outcomes of this work. The need for a strategic junction intervention was established as part of the Local Plan Review evidence base (considering 1,750dw at East Cullompton) which demonstrated that transport impacts on the M5 would be severe in the absence of significant improvements to the transport network. Through this work National Highways will require confidence that a proposed scheme adequately mitigates the SRN impacts of development at Cullompton and provides safe and suitable facilities to accommodate increased active travel demands across the motorway. Given proposals for a wider Garden Village of up to 5,000 houses, we anticipate and recommend that this work will consider travel demands associated with the wider development.

Within Section 4.9 we are pleased to see that potential noise and visual intrusion impacts from the M5 are being considered as a constraint within the Masterplan. We have recent examples of residential development experiencing noise issues because of having been located too close to the SRN. We endorse planning policy being proactive in considering and addressing this issue.

The 'East Cullompton Mobility Framework' plan on Page 106 includes three indicative active travel crossing points and two 'potential for future connection to JCT'. It is not clear what the latter entails, however it is presumed that the assumptions in this plan will be updated to align with the work currently being undertaken regarding Junction 28 improvement options. Two active travel crossing points appear facilitated by the existing structures over the M5 (at Old Hill and Junction 28), with one route appearing to require new infrastructure to the north. We would welcome further discussion regarding the establishment of specific active travel routes to serve the East Cullompton site where they interact with the SRN. It is identified on Page 127 that the active travel improvements are funded by "developer contributions/linked to public funding projects" – further thought is required regarding costs and likelihood of funding mechanism achieving delivery.

On Page 109, we assume Junction 28 is being referred to, rather than Junction 30.

As recognised in Section 5.4, "Honiton Road plays a key movement role in the wider highway network". This local road network has an important function for vehicles both exiting and arriving at Junction 28. Outcomes from the Junction 28 mitigation option work need to inform the policy approach for the role and function of Honiton Road. This includes decisions regarding priority and speed limits.

We agree that East Cullompton will benefit from a 'Site Wide Phasing and Delivery Plan document', as identified in Section 5.6 'Infrastructure, Delivery and Phasing'. We recommend this document should benefit from sufficient weight in the planning process, clearly outlining requirements and delivery mechanisms, to ensure that the development achieves appropriate phasing in terms of housing, education and employment. The establishment and agreement of such a phasing and delivery document would provide greater confidence regarding achievement of the site vision and Garden Community principles.

It is noted on Page 122 that there is a suggestion for a 'comprehensive approach' which includes "a consistent approach to the assessment of transport that starts with the vision for the site and then assesses impacts on that basis, offsetting any impact with a range of agreed initiatives". National Highways would welcome a comprehensive approach to site assessment, supporting the identification and delivery of necessary transport improvements. Nevertheless, as highlighted above, further certainty is required regarding the adoption and delivery of sustainability principles at East Cullompton to support any assessments that offset impacts against agreed initiatives.

Phases 1 and 2 of the Masterplan identifies delivery of the Honiton Road improvement, including an active travel route, across Junction 28 and into the proposed railway station. This route interacts with numerous access and egress points on the SRN and requires detailed thought regarding feasibility and implication. As per comments on Section 5.4, we await the current work looking at potential Junction 28 improvement options, which should inform understanding regarding this matter and the necessary characteristics of Honiton Road itself for vehicles. In terms of the table of 'Infrastructure Delivery Requirements' on Page 126 onwards, we have the following comments:

- Capacity improvements at M5 Junction 28:
  In terms of 'Timing' – it should be clarified that the 'required after first 500 homes completed' is subject to the prior delivery of the Town Centre Relief Road

- Cullompton Town Centre Relief Road:
  Query whether the 'Delivered by 2023' timetable is realistic

- Local highway enhancements to ensure any traffic impacts are mitigated:
  National Highways agree with the statement that these should be determined through transport assessment work but recommend that this should be led as part of the proposed 'comprehensive approach' and not left to component development sites

It is noted that the final section of the Masterplan considers the potential future extent of East Cullompton – up to approximately 5,000 dwellings. As previously noted, we recommend that this extent should inform the infrastructure choices made for the East Cullompton allocation to ensure that any provision is future proofed and able to accommodate the wider vision for Cullompton. This approach should be kept under review to accord with emerging contents of the next Local Plan, of which we expect a consultation next summer.

It would be much appreciated if reference to 'Highways England' in the document is updated to 'National Highways', noting our named changed in August 2021.

I hope these comments are useful and look forward to continuing to work with you on this project as it progresses.

6. Environment Agency

Thank you for your consultation in respect of this supplementary planning document (SPD).

Environment Agency position

We are supportive of the proposals set out in the Masterplan SPD, which addresses the key environmental risks and opportunities within the East Cullompton allocation and wider Culm Garden Village area beyond. Full implementation of the masterplan's proposals for blue ways, green ways, ecological networks, habitat enhancement and creation, and natural flood management will help contribute to the delivery of a sustainable development which will be resilient to a changing climate.

It will be essential that the masterplan SPD along with the relevant local plan policies are robustly applied to ensure development of the Culm Garden Village (CGV) successfully delivers this vision.

Our comments and recommendations on the parts of the SPD relevant to our remit are set out below.

Section 1 Introduction

The diagram 'Planning for the outcomes we need' in 1.3 (Scope and purpose) clearly sets out climate change, net zero and nature recovery as central cross-cutting themes driving change and influencing the masterplan's proposed outcomes. This is important and we strongly support this approach.

Section 2 Vision

We welcome the vision set out under the heading of Planet, People and Place (2.1). The new vision simplifies the nine original principles from the stage 1 consultation, focussing more holistically on the key challenges and desired outcomes. We support the focus on ensuring East Cullompton/CGV will be sustainable and resilient in the face of climate change, and the commitment to nature recovery and harnessing the Culm for the benefit of nature and flood management.

The overarching principles (2.2) which underpin the vision are intended to deliver some important outcomes. We are pleased to see climate change mitigation and adaptation, flood risk and water management, increasing biodiversity, protecting natural resources, and minimising pollution central to master-planning for East Cullompton. That these principles are shown clearly to cut across each of the broader headings of People, Planet and Place is also welcome.

Section 3 Influences

We are supportive of the Carbon Reduction Principles set out in 3.2. However, the SPD should also identify the principles and influences related to climate change adaptation and resilience. Whilst it is essential that all areas play their part in helping the World move towards achieving net zero carbon emissions, a degree of climate change is now unavoidable. Successfully achieving net zero carbon will require a global response, however, ensuring new settlements are designed and built to adapt to and be resilient to the inevitable impacts of climate change will make a big difference to long-term sustainability locally. Climate change adaptation and resilience is therefore a matter which is much more within the gift of local authorities.

Climate change adaptation could be addressed more explicitly by the SPD in the sub-section on Natural Capital (3.4), which already references the tangible and intangible benefits provided by natural capital such as climate regulation and flood management.

We welcome reference in 3.7 (Parallel work) to the Connecting the Culm project and the work being undertaken on the Strategic Flood Risk Assessment (SFRA) for the CGV.

Section 4 Understand the place

We are pleased to see that the 'constraints and the opportunities map' in 4.3 (Ecology) identifies diverse riparian planting and floodplain habitat opportunities. The supporting text (Habitats) also acknowledges the importance of wet woodland habitats. The map appears to omit some of the smaller watercourses around the site (e.g. the watercourse flowing south towards the A373 from Moorhayes Farm) but this may simply be because they are hidden by other habitat layers such as hedgerows.

We fully support the natural capital approach taken in the SPD. An array of ecosystem services are identified in 4.4 (Natural Capital), many of which overlap and complement each other (e.g. wetlands, natural flood management, water quality).

In respect of natural habitats, it is good that the SPD recognises the important role that fully functioning ecosystems play in providing resilience to climate change. Maintaining and enhancing corridors across the allocation and wider CGV area, particularly along the numerous watercourses will help knit existing habitat areas together as a bigger, better, more joined up ecological network. This is noted in the sub-section on habitat networks which follows.

We welcome the work that has been undertaken in respect of wetland habitat features, and opportunities to enhance and create more of these features. We look forward to seeing further work by your authority or landowners/developers in this area and the multifunctional benefits that could be delivered. This work ties in closely with work on natural flood management, which we are also pleased to see set out in the SPD.

We welcome the acknowledgement of phosphorus run-off from land into watercourses in the discussion under water quality. However, it should also be noted that whilst agricultural land is the source of most nutrients (like phosphorus) entering the waterbodies a significant contribution also originates from treated sewage effluent. Nutrients are an ongoing problem within the Culm Catchment and a key reason why waterbodies in the catchment are failing to achieve good ecological status under the Water Environment Regulations. Improvements in this area to reduce nutrient-laden run-off could help to offset the additional nutrients that will be introduced by the increase in foul flows to South West Water wastewater treatment works.

It is also good that this section on natural capital has identified the cooling potential of trees in the area and the associated benefits for climate mitigation and adaptation, and biodiversity.

We fully support the work undertaken so far in relation to flooding (4.5). Our review of the draft SFRA is ongoing and we will provide detailed comments in due course. We look forward to working with partners to ensure the opportunities offered by development of the East Cullompton allocation and CGV to deliver flood risk management improvements are realised.

The combined constraints plan (4.9) brings the key features together so as to present the foundations for the CGV's green-blue infrastructure network effectively. This is nicely complemented by the opportunities plan (4.10).

Section 5 Masterplan framework

In respect of landscape (5.3) we welcome the landscape framework, including the formalisation of 'The Blueways' and commitment to the use of sustainable urban drainage.

We note the passage regarding crossing points and fords. We would not encourage reliance on fords in light of the associated risks in times of high flow and flood. Any proposals for fords will need to be carefully considered and not result in increases in flood risk.

Section 6 Growing East Cullompton

The masterplan framework for the wider CGV project under 6.1 (Developing a framework for the wider opportunity area) identifies how the green and blue networks could be extended and enhanced beyond those shown in the masterplan for East Cullompton. We would strongly support establishing and enhancing these future corridors as early as possible.

With this in mind we welcome the intention under 6.3 (landscape) that the Blueways could continue to provide a central organising feature of the CGV. The Blueways established with the allocation area could be extended into the expansion area with the creation/formalisation of new ones. The suggestions in respect of flooding and drainage, and natural capital are also welcomed.

7. Natural England

Thank you for your consultation on the above dated 20 September 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Local Plan Policy deliverables

Mid Devon Local Plan Policy CU9 set out a requirement for the site to provide 'an area of 40 hectares for strategic green infrastructure' to include 'an appropriate mix of public parkland, open space, landscaping and local nature reserve'.

Natural England notes that the table on page 95 of the SPD sets out the size of the land areas for the specific types of public open space, in accordance with the Local Plan policy, and most of which are provided within the three community greens as shown on the map on page 102 of the SPD.

However, it is difficult to tell from the maps and descriptions where the amenity greenspace, public parkland and local nature reserve will be located. Additionally, and understandably, much of the strategic green infrastructure, as described in the SPD, is functional (e.g., water courses/SuDS, retained vegetation, and powerlines) and likely to be inaccessible to the public, and so it is unclear which areas will have the space to function as parkland and nature reserve rather than just as functional travel corridors. It would be useful if the SPD could include a map to show the preferred locations for the 6ha of amenity green space; the public parkland; and the nature reserve.

Biodiversity Net Gain (BNG)

Natural England notes, and welcomes, that the SPD sets out the authority's expectations (page 105) for the East Cullompton site to provide measurable net gains in biodiversity. The SPD outlines that there is potential for the site to achieve a 10.77% net gain by enhancing and converting offsite modified grassland and cropland to neutral grassland. Whilst it is welcomed that the initial calculations provided for the SPD confirm that at least 10% net gain is achievable, the detailed planning permission will need to secure an agreed biodiversity gain plan, based on detailed metric calculations.

It is disappointing to note that the SPD is seeking offsite delivery of BNG, as onsite delivery is Natural England's preferred approach. The biodiversity gain plan should set out the reasons for selecting this approach. It will also be necessary to demonstrate that any potential conflict with the recreational (and other) uses of the Country Park can be avoided, i.e., that the recreational use of the park will not affect the success of establishing the net gain site, and vice versa that the presence of the net gain habitats will not restrict the recreational (or other) use of the country park.

The SPD also provides an opportunity for the LPA to outline their priorities and expectations for the wide range of benefits for people and nature that can be delivered through biodiversity net gain, and how this site can contribute towards achieving the opportunities and actions identified in the emerging Devon Local Nature Recovery Strategy, and the Nature Recovery Network.

8. Sport England

Many thanks for consulting Sport England on the above document.

The provision of sport is a material consideration of the Local Planning Authority. This may be on-site within the development or a financial contribution to off-site locations. See Sports Facilities Calculator.

The provision of playing pitches should be guided by the adopted Mid Devon Playing Pitch Strategy (PPS) although we raise concern no stage E implementation/delivery group meeting has been held since adoption. A stage E meeting to discuss needs for East Cullompton would be a worthwhile exercise. We know from experience that what we ask for from developers is challenged as they only want to provide minimal facilities, that don't meet the needs of sport in the local area.

This consultation gives us opportunity to raise the need for a 3G artificial grass pitch (AGP) in the Cullompton area as we do not have a current site identified in the town.

Sports Facilities Calculator

This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types.

Active Design

Sport England has considerable synergy with the NPPF and paragraphs 92 and 93 promoting healthy and safe communities. And achieving well designed places paragraph 130. Active Design complements the latest thinking around 20 minute neighbourhoods.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via this link .

Appendix 1 contains a checklist that can demonstrate that the proposal has been / will be designed in line with the Active Design principles.

Cycle and walking networks should be extended to linking the existing urban area with the new development, and access to the surrounding natural environment. To encourage active travel there should be clear signage for cyclists into and out of the development site and to other destinations.

To bridge the gap between the high-level principles of Active Design and delivery in practice, we have worked with the Building Research Establishment (BRE) to link the overarching Active Design Principles with the individual scheme criterion in each of the BRE Environmental Assessment Methodology (BREEAM) family of schemes, including HQM, Communities and CEEQUAL.

We are currently researching and writing Active Design version 3 to be launched in 2023.

Physical Activity Opportunities

The applicant will need to ensure that other physical activity opportunities that should be considered:

* Need for an indoor meeting/activity space for winter activity and when it rains. Huge potential for a 'meet and greet' place for a wide range of informal activity groups, including:

Beginner running
Ride social
Boot camp
Pop-up family games

*An indoor multi-purpose space within the pavilion can cater for a range of activities, including:

Dance
Yoga/Pilates
Circuits
Mums & babies/toddlers activity sessions
Short Mat Bowls
Table Tennis

* Outdoor open access activity trail equipment. Ideally with a walk/jog/cycle trail around the perimeter of the space. This gives scope to a wide range of activity including 'story trails', green gym trail, junior/adult parkrun, circuits & boot camps. All activities that suit the demographic of families, busy working adults.

* Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children & families, this may include:

'Jumpers for posts'
Frisbee
Rounders
Fitness/Exercise sessions

* Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment.

Community Use of Education Sites

Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.

Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

Use Our School is a resource to support schools in opening their facilities to the community and keeping them open. It provides tried and tested solutions, real life practice, tips from people making it happen, and a range of downloadable resources link here

National Governing Bodies for sport (NGBs)

The RFU advise that page 102 of the draft masterplan shows the indicative locations and headline purposes of the Community Greens. The RFU notes the draft masterplan states 'sports pitches are to be provided within the Community Greens in accordance with the MDDC Playing Pitch Strategy unless offsite provision in a favourable location is agreed with MDDC'.

Cullompton RFC is located 1.3miles from the East Cullompton development and the adopted MDDC Playing Pitch Strategy (PPS) states the rugby clubs adult pitch is currently overplayed by 2.8 Match Equivalent sessions per week, with development of the women's and girls game adding additional demand on the current pitches. In addition, five rugby teams (one adult, two youth and two minis teams), requiring a minimum of one rugby pitch, are predicted to be generated through planned housing at East Cullompton to 2033.

With significant constraints at their existing site, the rugby club are proactively seeking viable sites to relocate with the PPS indicating a 4 adult pitch site with appropriate ancillary facilities is the minimum requirement aligned to the predicted team growth. The rugby club strong preference is to relocate to a site within the Culm Garden Village development, with space adjoining the new cricket club site initially identified by the rugby club to explore further.

The Football Foundation (FF) wishes to highlight the need for a single multi-functional and sustainable sporting hub site for East Cullompton. This is as is set out in the Mid Devon Playing Pitch Strategy (September 2021) recommendations.

The FF notes the following extracts from the strategy which support this need:

- The population from the East Cullompton housing growth area to 2033 is expected to generate demand for three adult, two youth and two mini pitches as a minimum, which should be accommodated within a community hub pitch site
- In order to provide a flexible, sustainable site which could accommodate a variety of pitch sizes and sports, a site of four hectares is recommended, which includes provision of a clubhouse/changing facilities.

Furthermore, the FF also wishes to draw attention to the fact that East Cullompton has been highlighted as a possible location for a full size 3G subject to it being delivered either a) in association with identified football pitches as a hub site and/or b) in association with the school.

Conclusion

Whilst supportive of the principle of development we would welcome further information and discussions to ensure the proposal meets the sport and physical activity needs of its proposed community on site and off site in line with the NPPF.

9. Blackdown Hills AONB

This response is made on behalf of the Blackdown Hills AONB Partnership. We welcome the opportunity to contribute to this consultation.

We are pleased that the Connecting the Culm project (which is led by the Blackdown Hills AONB Partnership) is referenced in the consultation documentation. To date, the Connecting the Culm project and team members have played an important role in the Culm Garden Village stakeholder forum, shared information and data including via the Strategic Flood Risk Assessment process and have added value to the Masterplan, through embedding resilience principles on a whole catchment scale into the process, to create an holistic approach to flood and drought management, alongside improvements to water quality, restoring biodiversity and storing carbon. We believe that there are significant opportunities to improve resilience both within and outside of the current allocation boundary, through targeted nature based solutions that could also provide 'blue routes' through the new development as well as create a 'resilience exemplar' country park(s).

We look forward to continued joint working with MDDC and others through the Connecting the Culm project, that is morphing and diversifying as it closes one funding chapter (Interreg 2 Seas) and opens others (Devon Resilience Innovation Project- DRIP and Natural Environment Investment Readiness Fund- NEIRF, plus emerging partnerships with asset managers including Network Rail and National Highways). Through the Connecting the Culm 25 year Blueprint, we have a route-map to a resilience catchment and have set targets up to 2050, with milestones at 2030 and 2040. It is clear that to restore the function of the whole catchment and build resilience is not a quick fix (£12.7 million investment over 25 years) but it will ultimately create 'headroom' and resilience to the East Cullompton/Culm Garden Village development itself, via upstream nature based solution interventions.

We are pleased to see that the Local Plan allocation policies have remained to the fore, noting the element of Policy CU9 regarding protecting the setting of the AONB. We support the guiding principle that the development should very much be seen as an integral part of Cullompton and yet

the eastern extent of the allocation site, and in time a larger development, should present a more natural rural fringe that 'fits' the landscape. We agree that the purpose of planting to the east should not be to screen the new development, but to enhance the natural setting and filter views from the AONB for example. As a key principle, we see the inclusion of green infrastructure as a fundamental element of this development and consequently would wish to ensure that this aspect of the infrastructure delivery plan is not weakened or overlooked.

The proximity to the AONB offers the potential for enhanced opportunities for non-car access, utilising new and enhanced off-road routes and quiet lanes. However it will be important to ensure that there are no unintended consequences for the AONB from such a large development close-by, including visitor pressures at certain sites, increased use of narrow, winding and steep lanes, and car and commercial traffic from the development taking shortcuts across the AONB.

These comments are made on behalf of the Blackdown Hills AONB Partnership in respect of its role to safeguard the distinctive landscape, wildlife, historical and architectural character of the Blackdown Hills whilst fostering the social and economic wellbeing of communities, and recognising the special cultural and geographical relationship between the AONB and the market towns surrounding it, including Cullompton. It is recognised that the AONB Partnership comprises a wide range of interests and organisations and that the comments made will not necessarily always be consistent with the views of individual partnership organisations, or responses made by organisations as statutory consultees.

Trusting that these comments are helpful in progressing the SPD.

10. Network Rail

Thank you for consulting Network Rail on East Cullompton Masterplan SPD. This email forms the basis of our response.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site allocations and future masterplans.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

East Cullompton Masterplan SPD

Policy CU8 acknowledges the reopening of Cullompton Station. The requirement is to support transport needs by working with Network Rail to promote new stations at both Cullompton and Wellington (albeit Wellington is not within your plan area but the development of both stations is coming forward together). As the proposals are developed, Network Rail would request detailed consideration to the quantification of demand for rail travel and should include identification of any

contributions to further improvements that would be merited at Cullompton. It could be that the predicted growth may increase future demands which may, in turn, necessitate the need for enhancements to facilities such as waiting rooms, improved passenger information, toilets and parking.

Transport Assessments and Level Crossings

Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process. This might be an increase in the use of an existing level crossing.

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings within Mid- Devon. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that "…development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

Consultation on pre-application and planning applications

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. With this in mind any planned future development (both residential and employment) should take into account any adverse impact on railway and therefore, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process.

We would therefore appreciate the Council providing Network Rail with an opportunity to comment on any future pre-application or planning applications should they be submitted for sites adjoining the railway or within close proximity to the railway as we may have more specific comments to make (further to those above).

We trust these comments will be considered in your preparation of the forthcoming policy documents.

11. National Grid

These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED), formerly Western Power Distribution (South West) Plc, in response to the East Cullompton Masterplan SPD (July 2022) which is subject to public consultation.

Introduction

NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers to enable the retention of its infrastructure.

In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.

Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) can normally be undergrounded or diverted without significant concern. However, where land allocations affect 132kV lines, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:

a) whether the lines could be accommodated within the development site; or

b) the viability and feasibility of diverting and/or undergrounding overhead lines.

This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within policy or guidance.

In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development.

NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation

site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan.

In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy or accompanying guidance to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land;

2. Early engagement with NGED to establish whether NGED's infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;

3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above;

4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.

In the context of point 4, NGED welcomes the preparation of a supplementary planning document for the masterplanning of East Cullompton. However, concerns are raised regarding the potential implications of the draft masterplan for National Grid's strategically important 132kV line.

Section 4.7 of the draft SPD deals with utilities and specifically the existing National Grid Electricity Transmission (NGET) 400kV line and NGED's 132kV lines which traverse the site. Although the SPD recognises that the 400kV lines are a fixed constraint to be incorporated into the masterplan, in respect of the 132kV it states:

"There are options available to reduce the effect of the Western Power Distribution (132kV) power lines. The land over which the lines pass within the site benefits from 'lift and shift' clause over the route easement. This enables the landowner to alter the path of the power lines if an alternative route is available. Land north of the allocation is also in the ownership of the landowner over which the WPD cables currently pass."

The East Cullompton Activity Framework on page 84 illustrates an area through the masterplan where it considers that a "*development area [is] enabled by undergrounding powerlines*".

On page 93, the SPD explains the Council's preference to underground the 132kV line:

"The potential to underground overhead powerlines should be explored, particularly where leaving them in-situ would place a significant obstruction and detraction from the quality and quantity of residential areas. Mid Devon District Council's preference is for the powerlines to be moved underground but a final decision will be subject to further masterplanning, feasibility and viability work.

The SPD Masterplan shows the eastern 132kv line undergrounded as this would cut through and segregate residential areas hindering the creation of a coherent development form. The area of land made available for development by undergrounding the 132kv lines (as shown) equates to around 7ha. or approximately 250 homes within the allocation area."

It goes onto set out how land beneath the powerlines could be used if retained overhead:

"The land beneath the powerlines is not considered suitable for the primary useable areas of public open space, where the presence of the lines would undermine the quality of the spaces beneath. The land beneath may be used for ancillary open space, wildlife corridors, streets and active travel corridors and potentially renewable energy generation."

NGED does not object to the Council's expression of a preference to underground the overhead lines as part of this masterplan and it welcomes the acknowledgement within the SPD that a final decision on the treatment of the overhead lines will be taken following further masterplanning, feasibility and viability work. However, NGED would like to take this opportunity to comment upon the Council's assumptions regarding the diversion and/or undergrounding of the 132kV and the perceived benefits to the masterplan.

The pylon towers on this route were constructed in 1989 and are in excellent condition. They would normally have a further lifespan well in excess of fifty years and there is no practical reason why development could not be built to either side of the lines with clearances maintained. Diversion of the overhead line circuits with underground cables would come at significant cost and operational disruption/risk with no obvious engineering benefit. Extensive additional work would need to be undertaken between National Grid, the local planning authority, landowners and developers to establish the feasibility, cost and viability of diverting or undergrounding the line before such proposals could be relied upon for the purposes of a future planning application.

National Grid has a duty to maintain its infrastructure in an efficient and cost effective manner. Diversion of the route onto land to the north, within the landowner's control, would increase the length of the overhead line and take a route which is considerably less efficient and direct than the current alignment, incurring additional cost and infrastructure into the National Grid Network for it to maintain.

Contrary to the claims within the SPD, proposals to underground the 132kV line would sterilise a corridor of land along the alignment of the line. Where high voltage electricity lines are undergrounded, National Grid is unable to support any development which could affect the operation of or obstruct the line, including buildings, tree planting, public highway or attenuation features over the cables; a 10m wide corridor of open ground would be required above the undergrounded cables. Conversely, where lines are retained overhead, the land beneath the lines can normally be used for green infrastructure, tree planting, drainage features and attenuation and public highway. Accordingly, the retention of the overhead lines offers greater opportunities to deliver an efficient and effective masterplan than proposals to underground. In addition, it would be necessary to install terminal towers at both ends of the overgrounded line. Land would need to be identified, and secured with willing landowners, to host the terminal towers and such towers are more visually imposing features than the normal pylons which they replace.

Proposals to underground or divert the electricity lines should also be considered in the context of the SPD's principle for carbon reductions, which is embedded in all disciplines of the planning process. The SPD should explore all opportunities to incorporate the overhead lines into the masterplan to avoid the considerable cost and carbon footprint associated with diverting or underground the lines and the additional infrastructure and construction processes this would involve.

Western Power Distribution issued a letter to Mid Devon District Council on 14 January 2022 requesting that the masterplanners engage with WPD (now National Grid) as soon as possible to agree the design principles associated with the 132kV line. To date, WPD/NGED has received no

response from Mid Devon District Council. The LPA is urged to engage NGED in the refinement of the East Cullompton SPD prior to its adoption, to ensure the implications of moving the overhead lines and the potential to retain the lines within the masterplan are both fully understood and reflected through an updated masterplan.

The SPD acknowledges the potential longer term growth of East Cullompton through further development to the north and east of the allocation. Such proposals, as illustrated within the SPD would have further implications for the 132kV line, with residential development proposed beneath the existing line to the east (as drawn it appears that MDDC assumes this would also be undergrounded). Whilst proposals for further expansion are yet to be confirmed through the emerging Local Plan, a long-term view of the proposals for the 132kV line is needed, taking into account the treatment of the 132kV line through the allocated site and the implications for the development of the wider site.

At the construction stage, any proposals to move the overhead line could have significant implications for the overall project cost, phasing and delivery.

These comments are intended to offer constructive comments on the draft SPD and masterplan. National Grid welcomes the positive steps being taken by Mid Devon District Council to establish a masterplan to inform the future planning of East Cullompton. However, it is concerned that the Council's preference to underground the 132kV line is misinformed and fails to take into account the implications for developable land, phasing and project cost. Officers are also reminded that NGED has statutory powers which it may exercise to retain the overhead line in situ.

National Grid would like to take this opportunity to reiterate its willingness to engage with Officers, prior to adoption of the SPD, to inform the masterplanning process.

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CABINET
7 FEBRUARY 2023

POLICY FRAMEWORK

Cabinet Member(s): Councillor R M Deed - Leader
Responsible Officer: Stephen Walford – Chief Executive

Reason for Report: To endorse the Policy Framework

Recommendation: To recommend to Council that the Policy Framework be adopted.

Financial Implications: None arising from this report.

Budget and Policy Framework: This report outlines the Council's Policy Framework.

Legal Implications: The report is required by the Constitution.

Risk Assessment: Not updating the strategic policies of the Council would result in policies not being aligned to corporate objectives and an inefficient use of resources.

Equality Impact Assessment: There are no concerns with regard to equalities impact relating to the content of this report.

Relationship to Corporate Plan: An efficient and effective policy framework helps provide the infrastructure to deliver the corporate plan

Impact on Climate Change: Several policies within the Policy Framework have a direct link to climate change.

1.0 Introduction/Background

1.1 The Policy Framework consists of both statutory documents that have to be adopted or approved by the Council as well as locally determined policies and strategies that form an integral part of the decision making process and their subsequent implementation.

1.2 A list of Strategies and Policies covered by the Framework is attached at Appendix 1.

1.3 It is recommended that these Strategies and Policies be formally approved as the Council's Policy Framework in accordance with the Constitution so far as they still apply and are relevant.

1.4 As new policies are approved by Council they will automatically be added to the Policy Framework.

2.0 Way Forward

2.1 Under the Budget and Policy Framework Procedure Rules, the Cabinet will be responsible for the implementation of the Budget and Policy Framework.

2.2 The purpose of this report therefore is to inform the Cabinet of their role in the implementation of the budget and policy framework, and highlighting to the Scrutiny Committee, Audit Committee and Policy Development Groups its work for the coming year.

2.3 The Policy Framework covers all strategic rather than operational policies and highlights those which are for Cabinet only approval and those which require full Council approval.

Contact for more Information: Stephen Walford, Chief Executive or Andrew Seaman, Member Services Manager

Circulation of the Report: Cabinet Members and Leadership Team

Appendix 1 - Community Policy Development Group						
Policy	**Head of Service**	**Last Approved**	**Group/Committee to review/develop**	**Expected date for next approval**	**Approval required from**	**Frequency to be reviewed**
Air Quality Action Plan	Director of Business Improvements and Operations	Nov-21	Community PDG	Nov-24	Cabinet	4 yearly
CCTV Policy	Deputy Chief Executive (S151)	Jan-21	Community PDG	Jan-24	Cabinet	3 yearly
Community Engagement Strategy (including Action Plan)	Director of Business Improvements and Operations	Mar-21	Community PDG	Mar-23	Cabinet	2 yearly
Corporate Anti Social Behaviour Policy	Director of Business Improvements and Operations	Mar-21	Community PDG	Mar-24	Cabinet	3 yearly
Corporate Heath & Safety Policy	Director of Business Improvements and Operations	Jan-21	Community PDG	Jan-24	Cabinet	3 Yearly
Customer Care Policy	Director of Business Improvements and Operations	Jan-22	Community PDG	Jan-24	Cabinet	3 yearly
Grant payments to external organisations (the strategic grants review process)	Director of Place	Jan-22	Community PDG	Jan-24	Cabinet	when appropaire
Enforcement Policy	Director of Business Improvements and Operations	Oct-20	Community PDG	Jan-23	Cabinet	When required
Safeguarding Children & Adults at Risk Policy and Procedures	Director of Business Improvements and Operations	Mar-22	Community PDG	Mar-25	Cabinet	3 yearly
Single Equalities Policy and Equality Objective	Director of Business Improvements and Operations	Mar-22	Community PDG	Mar-23	Cabinet	Annually
Town and Parish Charter	Director of Place	Jan-18	Community PDG	Jan-23	Cabinet	3 yearly
Unauthorised Encampment Policy	Deputy Chief Executive (S151)	Jun-22	Community PDG	Jun-25	Cabinet	3 yearly
Contaminated Land Cost Recovery Policy	Director of Business Improvements and Operations	Sep-20	Community PDG	Sep-25	Cabinet	5 yearly
The Council Tax Reduction Scheme & Exceptional Hardship Policy	Deputy Chief Executive (S151)	Dec-19	Community PDG	Jan-23	Cabinet	When required
Regulation of Investigatory Powers	District Solicitor (Monitoring officer)	Jan-22	Community PDG	Jan-23	Cabinet	Now Annually

Annexe 1
Notes
Joint PDG Community/Environment & Homes
Coming in Nov 2022 - Forward Planning
Coming in Jan 2023

Appendix 2 - Economy Policy Development Group

Policy	Head of Service	Last Approved	Group/Committee to review/develop	Expected date for next approval	Approval required from	Frequency to be reviewed
Destination Management Plan for Mid Devon	Director of Place	Mar-18	Economy PDG	Mar-23	Economy PDG - Cabinet	Every 5 years
Economic Strategy 2019-2024 (formerly known as the Mid Devon Economic Development Strategy 2012 - 2015)	Director of Place	Feb-19	Economy PDG	Jan-24	Economy PDG - Cabinet	5 yearly
Shopfront Enhancement Schemes (£15k non-key)	Director of Place	Nov-22	Economy PDG	Nov-25	Economy PDG - Cabinet	3 yearly
Strategy for Tiverton 2017/27	Director of Place	Feb-17	Economy PDG	Feb-27	Economy PDG - Cabinet	Every 10 years

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Appendix 3 - Environment Policy Development Group						
Policy	**Head of Service**	**Last Approved**	**Group/Committee to review/develop**	**Expected date for next approval**	**Approval required from**	**Frequency to be reviewed**
Bereavement Services Fees and Charges	Deputy Chief Executive (S151)	Nov-22	Environment PDG	Nov-23	Cabinet	Annually
Climate Strategy and Action Plan	Deputy Chief Executive (S151)	Oct-20	Environment PDG	Oct-24	Cabinet	4 yearly
High Hedges Policy	Director of Business Improvements and Operations	Aug-16	Environment PDG	Aug-23	Cabinet	7 yearly
National Assistance Burial Procedure	Deputy Chief Executive (S151)	Jun-19	Environment PDG	Jun-24	Cabinet	5 yearly
Open Space and Play Area Strategy (2013 - 2033)	Director of Business Improvements and Operations	Jan-15	Environment PDG	Jan-33	Cabinet	18 yearly
Parks and Open Spaces 10 Year Management Plan and Design Principles	Director of Business Improvements and Operations	Nov-17	Environemnt PDG	Nov-27	Cabinet	10 yearly
Play Area Safety Inspection Policy	Deputy Chief Executive (S151)	Jul-22	Environment PDG	Jul-25	Cabinet	3 yearly
Environment Educational Enforcement Policy	Director of Business Improvements and Operations	Mar-20	Environment PDG	Mar-23	Cabinet	3 yearly
Tree Policy	Deputy Chief Executive (S151)	May-21	Environment PDG	May-26	Cabinet	5 yearly

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Appendix 4 - Homes Policy Development Group

Policy	Head of Service	Last Approved	Group/Committee to review/develop	Expected date for next approval	Approval required from	Frequency to be reviewed
Tenant Involvement and Empowerment Standard						
Tenant Involvement and Empowerment Standard Policy	Director of Business Improvements and Operations	Jan-22	Homes PDG	Jan-26	Cabinet	4 yearly
Service Standards	Director of Business Improvements and Operations	Aug-16	Homes PDG	Jan-24	Cabinet	Will review when legislation /
Neighbourhood and Community Standard						
ASB Policy	Director of Business Improvements and Operations	Jul-15	Homes PDG	Jul-24	Cabinet	4 yearly
ASB Procedure	Director of Business Improvements and Operations	Jul-15	Homes PDG	Jul-24	Cabinet	4 yearly
Car Parking Management Policy	Director of Business Improvements and Operations	Mar-20	Homes PDG	Jul-24	Cabinet	4 yearly
Garage Management Po	Director of Business Improvements and Operations	Jan-20	Homes PDG	Jul-24	Cabinet	4 yearly
Domestic Abuse Policy	Director of Business Improvements and Operations	Jun-15	Homes PDG	Jul-24	Cabinet	4 yearly

Pets and Animals Policy	Director of Business Improvements and Operations	Oct-19	Homes PDG	Jul-24	Cabinet	4 yearly
Tenancy Inspection Polic	Director of Business Improvements and Operations	Jul-16	Homes PDG	Jul-24	Cabinet	4 yearly
Harrassment Policy	Director of Business Improvements and Operations	Oct-19	Homes PDG	Jul-24	Cabinet	4 yearly
Hoarding Policy	Director of Business Improvements and Operations	Sep-18	Homes PDG	Jul-24	Cabinet	4 yearly
Neighbourhood Management Policy	Director of Business Improvements and Operations	Sep-18	Homes PDG	Jul-24	Cabinet	4 yearly
CCTV and Camera Doorbell Policy	Director of Business Improvements and Operations	Nov-22	Homes PDG	Nov-27	Cabinet	5 yearly
Homes Standard						
Void Management Policy	Director of Business Improvements and Operations	Jan-23	Homes PDG	Jan-24	Cabinet	4/5 yearly
Improvements to Council Properties Policy	Director of Business Improvements and Operations	Jan-20	Homes PDG	Jan-24	Cabinet	4/5 yearly

Fire Risk in Communal A	Director of Business Improvements and Operations	Jul-17	Homes PDG	Jan-24	Cabinet	4/5 yearly
Aids and Adaptations Po	Director of Business Improvements and Operations	Sep-16	Homes PDG	Jan-24	Cabinet	4/5 yearly
Asbestos Management F	Director of Business Improvements and Operations	?	Homes PDG	Jan-24	Cabinet	4/5 yearly
Gas Safety Policy	Director of Business Improvements and Operations	Sep-18	Homes PDG	Jan-24	Cabinet	4/5 yearly

Tenancy Standard

Tenancy Standard Fram	Director of Business Improvements and Operations	Jul-22	Homes PDG	Jul-26	Cabinet	4/5 yearly

Rent Standard

Income Management Po	Director of Business Improvements and Operations	Aug-15	Homes PDG	Sep-24	Cabinet	4/5 yearly

Recharges Policy	Director of Business Improvements and Operations	Sep-18	Homes PDG	Sep-24	Cabinet	4/5 yearly
Strategies						
Tenancy Strategy	Director of Business Improvements and Operations	?	Homes PDG	Nov-24	Cabinet	3 yearly
Housing Strategy	Director of Business Improvements and Operations	Sep-21	Homes PDG	Nov-24	Cabinet	3 yearly
Other						
HRA budget	Director of Business Improvements and Operations	Jan-23	Homes PDG	Jan-24	Cabinet	Annually
Private Sector Fees and Charges	Director of Business Improvements and Operations	Nov-22	Homes	Nov-23	Cabinet	Annually

Appendix 5 - Licensing & Regulatory Committees							
Policy	**Responsible Officer**	**Last Approved**	**Group/Committee to review/develop**	**Expected date for next approval**	**Approval required from**	**Frequency to be reviewed**	**Comments**
Hackney Carriage and Private Hire Policy and Conditions	Corporate Manager for Public Health , Regulation and Housing	Nov-18	Regulatory Committee	Mar-23	Council	3 Yearly	
Licensing Policy	Corporate Manager for Public Health , Regulation and Housing	Nov-18	Licensing Committee	Oct-23	Council	5 yearly	
Statement of Principles for Gambling Act 2005	Corporate Manager for Public Health , Regulation and Housing	Dec-21	Licensing Committee	Oct-24	Council	3 Yearly	
Mobile Homes FIT AND PROPER PERSON FEE POLICY	Corporate Manager for Public Health , Regulation and Housing	Sep-21	Regulatory Committee	Sep-22	Delegated to Officers	Annual	

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Appendix 6 - Audit Committee						
Policy	**Head of Service**	**Last Approved**	**Group/Committee to review/develop**	**Expected date for next approval**	**Approval required from**	**Frequency to be reviewed**
Annual Governance Statement and Governance Framework	Director of Business Improvements and Operations	Jan-23	Audit Committee	Sep-23	Audit Committee	Annually
Anti-fraud and Corruption and Anti-Money Laundering Policies	Director of Business Improvements and Operations	Mar-21	Audit Committee	Jan-23	Audit Committee	2 yearly
Corporate Recovery Policy	Deputy Chief Executive (S151)	Mar-21	Audit Committee	Mar-24	Cabinet	3 yearly
Financial and Contract Procedure Rules	Deputy Chief Executive (S151)	Jan-22	Audit Committee	Jan-25	Audit Committee - Full Council	3 yearly
Four year Strategic Audit Plan and Work Programme	DAP	Mar-22	Audit Committee	Mar-23	Audit Committee	Annually
Internal Audit Charter and Strategy	DAP	Mar-22	Audit Committee	Mar-23	Audit Committee	Annually
Risk Management Strategy	Director of Business Improvements and Operations	Mar-22	Audit Committee	Mar-23	Audit Committee	Annually
Whistleblowing Policy	Director of Business Improvements and Operations	Mar-21	Audit Committee	Mar-25	Audit Committee	4 yearly

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Appendix 7 - Cabinet

Policy	Head of Service	Last Approved	Group/Committee to review/develop	Expected date for next approval	Approval required from	Frequency to be reviewed	Detailed notes
Statement of Community Involvement	Director of Place	Aug-20	PPAG	when required	Council	As and when required	
Area of Special Control for advertisements	Director of Place	Dec-11	PPAG	Linked to the Local Plan	Council	When required	
Asset Management and Capital Strategy Plan 2016-2020	Deputy Chief Executive (S151)	Mar-21	Cabinet	Mar-25	Cabinet	4 years	
Channel Access Strategy 2014-2017	Director of Business Improvement and Operations	Sep-18	Cabinet	Mar-23	Cabinet	3 years	
Community Infrastrure Levy	Director of Place	Jan-21	PPAG	As and when required as part of the Local Plan	Council	As and when required as part of the Local Plan	
Complaints and Feedback policy	Director of Business Improvement and Operations	Jan-21	Cabinet	Jan-24	Cabinet	3 years	
Corporate Asbestos Policy	Deputy Chief Executive (S151)	Feb-20	Cabinet	Feb-23	Cabinet	3 years	
Corporate Debt Recovery Policy	Deputy Chief Executive (S151)	Mar-21	Audit Committee - Cabinet	Mar-24	Cabinet	3 years	
Corporate Plan (2020-2024)	Director of Business Improvement and Operations	Feb-20	Cabinet	Feb-24	Council	4 yearly	
Council Tax Reduction Scheme	Deputy Chief Executive (S151)	Dec-16	Cabinet	When Required	Cabinet	When required	This includes the Exceptional Hardship Policy . It also includes the MDDC Fraud penalty Policy (as per JC Apr 16)
Data Protection Policy	Director of Business Improvement and Operations	Oct-22	Cabinet	Oct-25	Cabinet	3 yearly	

Appendix 7 - Cabinet

Policy	Head of Service	Last Approved	Group/Committee to review/develop	Expected date for next approval	Approval required from	Frequency to be reviewed	Detailed notes
Discretionary Rate Relief Scheme	Deputy Chief Executive (S151)	Feb-19	Cabinet	awaited	Cabinet	Annually	The changes that have come in are mandatory – PM/Chancellor to advise anymore and then request s151, portfolio holder sign off
Email Policy	Director of Business Improvements and Operations	Jan-21	Cabinet Member for Community-Well-Being	Jan-23	Cabinet Member for Community Well-Being	2 Yearly	Have asked the question
The Establishment	Director of Business Improvements and Operations	Feb-22	Cabinet	Feb-23	Council	Annually	Now includes details of the Workforce Plan and the
Freedom of Information Policy	Director of Business Improvements and Operations	Oct-22	Cabinet or Cabinet Member	Oct-25	Cabinet	3 yearly	
ICT Strategy	Director of Business Improvements and Operations	Feb-19	Cabinet	Feb-24	Cabinet	5 yearly	
Internet Policy	Director of Business Improvements and Operations	Jan-21	Cabinet Member for Community Well-Being/and Corporate Manager	Jan-24	Cabinet Member for Community Well-Being	5 Yearly	
Leisure Pricing Policy	Deputy Chief Executive (S151)	Dec-22	Individual Decision by the Cabinet Member for Community Well Being	Dec-23	Cabinet Member for Community Well-Being	Annually	
Local Development Scheme	Director of Place	Jan-22	PPAG	As and when required as part of the Local Plan	Cabinet	As and when required as part of the Local Plan	
Local Enforcement Plan (replaces Development Control Enforcement Policy)	Director of Place	Jan-18	PPAG	awaited	Council	3 yearly	
Local Plan	Director of Place	Jul-20	Cabinet	Jul-25	Council	5 Yearly	
Medium Term Financial Strategy	Deputy Chief Executive (S151)	Nov-22	Cabinet	Dec-23	Cabinet	Annually	

Appendix 7 - Cabinet

Policy	Head of Service	Last Approved	Group/Committee to review/develop	Expected date for next approval	Approval required from	Frequency to be reviewed	Detailed notes
Pay Policy	Director of Corporate Affairs and Business Transformation	Feb-22	Cabinet	Feb-23	Council	Annually	
Records Management Policy	Director of Business Improvement and Operations	Oct-22	Cabinet	Oct-26	Cabinet	4 yearly	
Treasury Management Strategy and Annual Investment Strategy	Deputy Chief Executive (S151)	Feb-22	Cabinet	Feb-23	Council	Annually	
Information Security and Information Security Incident Policies	Director of Business Improvements and Operations	Jan-22	Cabinet	Oct-25	Cabinet	3 yearly	

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MID DEVON DISTRICT COUNCIL – SCHEDULE OF MEETINGS – 2023-2024

Ratified by Council on ……..

MEETING	Normal day and Time	1 2023	2	3	4	5 2024	6	
Planning Committee *(first meeting of cycle)*	Wed	14th June	2nd August	13th September	22nd November	10th January	13th March	
Planning Committee *(second meeting of cycle)*	Wed	12th July	30th August	11th October	13th December	14th February	10th April	
CABINET *(first meeting of cycle)*	Tues	6th June	1st August	19th September	14th November	9th January	5th March	
CABINET *(second meeting cycle)*	Tues	4th July	29th August	17th October	12th December	6th February	2nd April	
ENVIRONMENT PDG	Tues	20th June	15th August	10th October	7th November	9th January	12th March	
HOMES PDG	Tues	13th June	8th August	26th September	21st November	16th January	19th March	
ECONOMY PDG	Thurs	8th June	3rd August	4th October	17th November	4th January	7th March	
COMMUNITY PDG	Tues	27th June	22nd August	24th October	5th December	23rd January	26th March	
SCRUTINY COMMITTEE (*first meeting of cycle)*	Mon	19th June	14th August	2nd October	27th November	15th January	18th March	
SCRUTINY COMMITTEE *(second meeting of cycle)*	Mon	17th July	11th September	30th October	18th December	19th February	15th April	
AUDIT COMMITTEE	Tues	27th June	22nd August	24th October	5th December	16th January	26th March	
Standards Committee	Weds	21st June		18th October		7th February		
Licensing Committee	Fri	30th June			1st December			
Regulatory Committee	Fri	30th June			1st December			
Away Days	Fri 9.30am							
COUNCIL	Wed 6.00pm	19th July	6th September	1st November	20th December	21st February	24th April	**22 MAY 2024**

Note: (i) *Annual meeting of the Council at 7.00pm. **Annual Meeting in 2023 is on 24 May**
(ii)*Annual meeting of the Council at 7.00pm. **Annual Meeting in 2024 is on 22 May**

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COUNCIL
18 JANUARY 2023

3 Rivers Developments Limited – Business Plan 2023–2028 and 2 associated Business Cases

Cabinet Member: Councillor Bob Deed – Leader and Councillor Clive Eginton – Deputy Leader

Responsible Officers: Deputy Chief Executive (s151) – Andrew Jarrett

Reason for Report: To review the Business Plan(s) and 2 associated Business Cases.

RECOMMENDATION: That Council considers and approves one of the two Business Plans submitted by the company and the 2 associated Business Cases.

Relationship to Corporate Plan: 3 Rivers Developments Limited's (3Rivers) key aims are to: increase the level and quality of housing units within the District and look to help regenerate sites/areas in need of assistance and generate future returns in order to grow the business and to recycle monies made back to the Council to mitigate some of the cuts in Government funding.

Financial Implications: The key financial considerations are identified within the report and there are two detailed part 2 consideration papers that focus on the overarching risk, financial implications and the operational consequences of a decision that doesn't support either of the 2 submitted Business Plans.

Legal Implications: This report is prepared in accordance with the Shareholder Agreement, Company's Memorandum and Articles of Association. In addition the aforementioned part 2 papers that have been produced include details of the legal implications that would need to be considered in the event that neither of the 2 Business Plans are supported.

Risk Assessment: All commercial lending to 3rd parties, will by default, expose the lender to a degree of financial risk. Risk identification, mitigation and control measures, financial processes, audit regimes, etc. embedded by both the lender and borrower can all reduce/control associated risk levels. The Council will always consider risk vs return in all lending activities in enters into and identify/evaluate the potential level of total exposure. When reviewing these risks the Council will consider: demonstrable track record of delivery and financial forecasting (costs and sales), company qualifications/skills/knowledge, information from 3rd parties, prevailing housing market factors, local/regional supply issues, etc.
And ultimately risk vs reward set against other investment opportunities.

This report includes additional part 2 papers that further address the risk implications to the Council. These seek to ensure that members are advised on all areas of risk and additionally respond to questions raised when this item was considered at Cabinet, where a more comprehensive risk analysis was requested.

Equality impact assessment: No direct equality issues identified for this report.

Impact on climate change: 3Rivers is a commercial organisation and where deliverable sustainable options are available they are utilised; however, as a commercial organisation it is acknowledged that there is currently a significant cost differential on build options and what the market will sustain plays heavily in the choices made, bearing in mind the mandate to return target levels of investment return (profit).

1.0 Introduction

1.1 An initial Business Plan provided by the company was reviewed by meetings of both the Scrutiny and Audit Committees back in November 2022. Feedback and comments from these meetings was provided to the Cabinet.

1.2 Subsequent to this feedback discussions were held with some members of the Cabinet and the company to propose revisions to the previously submitted Business Plan.

1.3 This revised Business Plan and the one previously submitted were both included on the Cabinet agenda for consideration at their meeting on the 3 January 2023 along with 2 Business Cases for projects in Bampton and Tiverton.

2.0 Cabinet 3 January 2023

2.1 After reviewing the Business Plans which also included the ability to ask questions of the 3 company Directors. The Cabinet decided to refer the 2 Business Plans and 2 Business Cases to a special meeting of Full Council.

3.0 The 2023 – 2028 Business Plan

3.1 After reflecting on the 2 aforementioned meetings the Cabinet fed back to the Company the considerations identified in paragraph 1.1 and then requested an amended Business Plan shown as the (Addendum).

3.2 Therefore, the Cabinet now have 2 Business Plans from the company to consider. Which are quite similar in funding requested for 2023/24, but have a different make-up in terms of project size/profile and level of future projects.

3.3 Any company Business Plan that projects in to the future, especially at the current juncture, is subject to change/revision, especially the further you move in to later years. What the Business Plan provides is a general overview of company ambitions, areas of focus, metrics it will use to judge itself by and report on, risk appetite and mitigation measures and finally an overarching budget envelope for the period.

3.4 This financial envelopes of both plans provide a reasonably accurate budget forecast for 2023/24 and the projects that they are already committed to. Thereafter, the budget makes sound commercial estimates over the potential sums that will be required to keep the company viable and deliver the level of returns back to the Shareholder.

3.5 The total loan request for 2023/24 in both plans is circa £22.1m and then varying levels of loan exposure during the remainder of the 2 plans. This funding envelope will see the culmination of St Georges Court, Tiverton and another site in Bampton, plus a number of new sites currently under consideration and then an estimate for potential new developments that are being explored. In addition there is the ongoing provision for the company's working capital requirements.

3.6 Embedded within the company's Business Plan, reference is made to the annual interest payments that will be made back to the Council and Members should also be aware of the recharged costs that the Council makes to the company. These relate to officer time, office accommodation, IT support, etc. To put this in to context the table below summarises these transactions since the company's inception. For completeness, it also includes all financing costs and any loan impairments.

Financial transactions between 3Rivers and Mid Devon DC

	2017/18 2018/19	2019/20	2020/21	2021/22	2022/23 Actuals as at 31/10/22	**Total**
Revenue Items £k						
Gross Interest Rec'd	71.4	251.0	496.4	558.4	525.5	**1,902.7**
Direct Cost external of Borrowing	0	0	0	0	0	**0**
Dividends Paid	0	0	0	0	0	**0**
MDDC Recharges	170.2	97.2	103.8	15.6	0.6	**387.4**
Total	**241.6**	**348.2**	**600.2**	**574.0**	**526.1**	**2,290.1**

	2017/18 2018/19	2019/20	2020/21	2021/22	2022/23 Actuals as at 31/10/22	**Total**
Loans £k						
Advanced	2,612.9	6,998.2	1,741.7	4,581.4	4,087.6	**20,021.8**
Repaid		-550.0	-640.0	-1,208.7	0	**-2,398.7**
Loan Movement	**2,612.9**	**6,448.2**	**1,101.7**	**3,372.7**	**4,087.6**	**17,623.1**
Impairments		-790.0				**-790.0**

Notes on the Table:

i) The loans repaid figures relate to a VAT refund in 2019/20 and sale proceeds from the Threwstones, Tiverton and The Orchard, Halberton developments.

ii) The impairment relates to £617k St Georges Court (estimated loss) and £173k working capital charge. This figure was reviewed and carried forward in to the 2020/21 end of year Accounts. The 2021/22 level will be reviewed as part of the External Audit process – which is still ongoing.

iii) The 'Costs of Borrowing' refers to any external costs arising from the Council making use of external financing facilities such as PWLB. None has been incurred. The 'opportunity cost' over this timeframe has been minimal with interest on savings rates at such low levels.

3.7 The above table details the direct financial benefits that accrue from the Council's investment in 3 Rivers. However, Members should also be aware that other indirect benefits are obtained. For example:

- ✓ Increased Council Tax and Business Rate receipts
- ✓ Extra New Homes Bonus revenue
- ✓ Some control over timetable and quality of development
- ✓ Some influence over affordable/social housing delivery numbers
- ✓ Regeneration potential
- ✓ Greater use of local supply chains and contractors

3.8 The Business Plan also specifically focuses on key areas of company activity; ongoing governance, the prevailing market, risk, success metrics, future strategy and includes a progress overview of 2022/23 and its goals for 2023/24.

4.0 Risks

4.1 Many of the discussions surrounding the Council funding of 3 Rivers focus predominantly around risk and reward. As much of these considerations/deliberations will be of a commercially sensitive nature two part 2 papers have been provided in order to identify and then evaluate associated risks as requested by the Cabinet. It should be noted that in order to facilitate an extensive view on quantification/quantum of risk, further work may be required in order to fully evaluate and then quantify the financial, legal and operational magnitude of any decision not to support either of the two submitted Business Plans and determine what risks and cost exposure any next steps/decisions may incur.

5.0 Conclusion

5.1 Any investment decision ultimately has to be evaluated by the concept of risk vs reward. This decision will be affected by an investor's appetite for risk, the profile, size and scope of other investments, prevailing market conditions and past performance experience.

5.2 All investments have a degree of risk, but the Council must decide how it wants to structure its portfolio of investments, both in the short and longer term, in full regard that market conditions will have both positive and negative impacts.

5.3 There is no risk-free option here, as decisions to invest in the Council's company contain risk, as does any decision to not invest. While quantification of these risks (and their impacts) will be an exercise in estimation, forecasting and assumption, in principle the balance of risk must be weighed between the risk of not achieving the investment returns as forecast and the risk of removing this income potential from the Council's budget.

Contact for more information: Andrew Jarrett, Deputy Chief Executive (S151)

Circulation of the report: Leadership Team and Cabinet

List of Appendices

Appendix 1 – 3RDL Business Plan 02/11/22
Appendix 2 – 3RDL Business Plan Addendum 16/12/22
Appendix 3 – 3RDL Project Appraisal - Bampton
Appendix 4 – 3RDL Project Appraisal - Park Rd
Appendix 5 – Financial Risk Analysis
Appendix 6 – General Risk Analysis

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CABINET
3 JANUARY 2023

3 Rivers Developments Limited – Project Appraisal (5 Levels, Bampton)

Cabinet Members: Councillor Bob Deed – Leader
Councillor Clive Egerton – Deputy Leader

Responsible Officers: Deputy Chief Executive (S151) – Andrew Jarrett

Reason for Report: To provide Cabinet with a business case for a second development scheme at Bampton which is included in the company's recent Business Plan.

RECOMMENDATION: That Cabinet approves the company's business case for 5 Levels, Bampton development.

Relationship to Corporate Plan: 3 Rivers Developments Limited's (3Rivers) key aims are to: generate future returns in order to grow the business and to recycle monies made back to the Council to mitigate some of the cuts in Government funding, increase the level and quality of housing units within the District and look to help regenerate sites/areas in need of assistance.

Financial Implications: The Council has a duty to obtain value for money. All financial interactions between the Council and 3Rivers are carried out at commercially evidenced rates and subject to individual loan agreements. An overall project GDV return of 9.7% has been estimated and interest payments to the Council would form part of the overall estimate of £900k already included in the 2023/24 draft budget.

Legal Implications: None to this report. However, this report is prepared in accordance with the Shareholder Agreement, Company's Memorandum and Articles of Association and currently Approved Business Plan.

Risk Assessment: Detailed within the report.

Equality impact assessment: No equality issues identified for this report.

Impact on climate change: 3Rivers is a commercial organisation and where deliverable sustainable options are available they are utilised; however, as a commercial organisation it is acknowledged that where there is a significant cost differential and what the market will sustain that this plays heavily in the choices made.

1.0 Introduction

1.1 The Cabinet are considering as part of this agenda the updated Business Plan 2023/24 from 3Rivers Development Ltd. Included within that plan is an estimated amount for this project. It was also agreed at Cabinet in July 2020 that any development with an estimated build cost in excess of £1m must be

brought to Cabinet for consideration. This consideration would include a detailed business case report from the company.

2.0 Business Case - Bampton

2.1 Attached to this report is the confidential company business case for a residential development of 9 market houses in Bampton. This overall appraisal includes estimates regarding: scheme build costs, contingency sums, sales predictions, overall project returns, risk issues, etc. As members can see from the attached report, all project costs and revenues have been produced with the benefit of assistance from professional organisations operating with local market knowledge/experience.

2.2 The Council's Deputy Chief Executive (S151) has reviewed the company's business case and all the attached paperwork and is assured that all estimated project costs and potential receipts have been produced to the best of the company's ability and has utilised external advice where appropriate.

2.3 The business case estimates a potential return of 9.7% GDV and would deliver interest payments which form part of the aggregate budgeted sum of £900k currently included in the 2023/24 draft budget.

3.0 Conclusion

3.1 Members will be aware that this project is included in the company's business plan for 2023/24.

Contact for more information: Andrew Jarrett, Deputy Chief Executive (S151)

Circulation of the report: Leadership Team and Cabinet

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CABINET
3 JANUARY 2023

3 Rivers Developments Limited – Project Appraisal for Park Nursery, Tiverton.

Cabinet Members: Councillor Bob Deed – Leader
Councillor Clive Eginton – Deputy Leader

Responsible Officers: Deputy Chief Executive (S151) – Andrew Jarrett

Reason for Report: To provide Cabinet with a business case for a 6 unit residential development scheme in Tiverton which is already included in the company's current Business Plan 2022/23.

RECOMMENDATION: That Cabinet approves the company's business case for the Park Nursery, Tiverton development.

Relationship to Corporate Plan: 3 Rivers Developments Limited's (3Rivers) key aims are to: generate future returns in order to grow the business and to recycle monies made back to the Council to mitigate some of the cuts in Government funding, increase the level and quality of housing units within the District and look to help regenerate sites/areas in need of assistance.

Financial Implications: The Council has a duty to obtain value for money. All financial interactions between the Council and 3Rivers are carried out at commercially evidenced rates and subject to individual loan agreements. An overall project GDV return of 11.5% has been estimated and interest payments to the Council would form part of the overall estimate of £900k already included in the 2023/24 draft budget.

Legal Implications: None to this report. However, this report is prepared in accordance with the Shareholder Agreement, Company's Memorandum and Articles of Association and currently Approved Business Plan.

Risk Assessment: Detailed within the report.

Equality impact assessment: No equality issues identified for this report.

Impact on climate change: 3Rivers is a commercial organisation and where deliverable sustainable options are available they are utilised; however, as a commercial organisation it is acknowledged that where there is a significant cost differential and what the market will sustain that this plays heavily in the choices made.

1.0 Introduction

1.1 The 2022/23 3River's Business Plan includes provision for a development at Park Nursery, Tiverton. However, as this development exceeds £1m it needs to be considered, on an individual scheme specific basis, as per earlier Cabinet approved recommendations.

2.0 Business Case – Park Nursery, Tiverton

2.1 Attached to this report is the confidential company business case for a residential development of 6 market houses on the site known as Park Nursery in Tiverton. This overall appraisal includes estimates regarding: scheme build costs, contingency sums, sales predictions, overall project returns, risk issues, etc. As members can see from the attached report, all project costs and revenues have been produced with the benefit of assistance from professional organisations operating with local market knowledge/experience.

2.2 The Council's Deputy Chief Executive (S151) has reviewed the company's business case and all the attached paperwork and is assured that all estimated project costs and potential receipts have been produced to the best of the company's ability and has utilised external advice where appropriate.

2.3 The business case estimates a potential return of 11.5% GDV and would deliver interest payments which make up the aggregate budgeted sum of £900k currently included in the 2023/24 draft budget.

3.0 Conclusion

3.1 Members will be aware that this project is already included in the company's business plan for 2022/23.

Contact for more information: Andrew Jarrett, Deputy Chief Executive (S151)

Circulation of the report: Leadership Team and Cabinet

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Mid Devon District Council
STANDARDS TASK & FINISH GROUP
(Council Procedure Rules Review)

Findings and Recommendations Report

Executive Summary

1. The Task & Finish Group recommends to the Standards Committee (for recommendation onto full Council) that the following amendments be made to the Constitution:

   (a) The Council Procedure Rule 25.2 be suspended to allow the following amendments to be made to the Constitution at its next meeting.
   (b) Subject to any further changes to recommendations (c), (d) and (g) below, the Council Procedure Rules be amended as outlined in Appendix B to this report.
   (c) The Council Procedure Rules regarding Member Questions be amended as set out in Appendix B Rule 10.
   (d) The Council Procedure Rules regarding Public Questions be amended as set out in Appendix B Rule 8.
   (e) Members' Business remain on full Council but Members be asked to take account of the guidance on its use set out in this report at paragraph 4.4.
   (f) The requirement for the Planning Committee to consider an Implications Report (if it proposes to determine an application contrary to policy and officer recommendation) before decision confirmed, be removed.
   (g) The rules on Substitute Members be amended so that trained substitutes may come from any group where there is no other trained Member in the permanent Members' political group.
   (h) The practice at full Council for Chairs to have to read out minutes of each committee (including PDGs and Cabinet) be stopped.

2. The Task & Finish Group recommends to the Standards Committee (for its resolution) that Motion 577 not be supported.

Report Detail

1. Introduction

1.1 The Task and Finish Group ("**T&FG"**) was set up by its parent Standards Committee on 9 February 2022 to review the Council's Procedure Rules ("**CPRs**"). All group leaders[1] and a Standards Committee representative were appointed to the T&FG. The Group has been chaired by Cllr Eginton.

1 Cllr Eginton (Conservative) April to May 2022 and Chair of T&FG; Cllr Deed (Independents Group); Cllr Evans (Conservative) Feb to April 2022; Cllr Clist, Deputy Leader (Lib Dems); Cllr Lloyd (Greens); Cllr Warren (Non Aligned Group)

1.2 The CPRs are set out in the Constitution Part 4, Section 1[2]. Although the CPRs were the focus, the Panel noted that there are various other procedure rules covering different meetings and processes for the Council's member decision making and also that some matters raised for consideration did not form part of the CPRs. Consequently it has commented on procedural matters beyond the CPRs where it considered appropriate to do so without detracting from its terms of reference[3].

1.3 The group also sought the views of other Members. The Chair of the Planning participated in the discussion on proposed changes to the Planning Committee. His investigations into the manner in which other councils' planning committees operated was welcome. In undertaking its review the Group also sought clarification on Motion 577[4] from the mover of the motion[5]. Following on from the T&FG's preliminary findings on 1 April 2021, the T&FG requested that each group leader[6] consult their own groups, to seek their group's views of the T&FG's proposed recommendations and identify any other issues for consideration. No other issues or objections were identified beyond those included in Appendix A.

1.4 The T&FG has considered all representations made to it before reaching its final recommendations which are set out in this report. The recommendations are supported by the Members of the T&FG unanimously with the exception of Recommendation 2 (Motion 577) which the Non-Aligned Group Leader considered should be accepted.

2. Current Council Procedure Rules

2.1 The T&FG noted that the CPRs cover the procedures applicable to full Council meetings but also some elements of the other committees and Policy Development Groups. Where other rules apply (being ones specific to specified committees or PDGs) these are listed below for information.

Full Council	All Council Procedure (Rules 1 to 27)
Cabinet	Council Procedure Rules 5-8, 11, 16.1 (other than 16.4 and 16.5) , 19, 20.1, 21 - 25 All Cabinet Procedure Rules (Rules 1 – 3)
Scrutiny	Council Procedure Rules 4 – 8, 11, 16.1 (other than 16.4 and 16.5), 19, 20.1, 21 - 25 Scrutiny Committee, Audit Committee, Standards Committee and Policy Development Group Procedure Rules (1 - 3, 5 – 7, 10 - 21, 23 – 26)
PDGs	Scrutiny Committee, Audit Committee, Standards Committee and Policy Development Group Procedure Rules (1 - 2, 4 - 6, 8, 10, 12, 14 - 15, 18, 22, 23)
Audit	Scrutiny Committee, Audit Committee, Standards Committee and Policy Development Group Procedure Rules (1 – 2, 5 – 6, 8, 10, 12, 14, 26)
Standards	Scrutiny Committee, Audit Committee, Standards Committee and Policy Development Group Procedure Rules (1 - 2, 5 - 6, 9 – 10)
Planning	Council Procedure Rules 5-8, 11, 16.1 (other than 16.4 and 16.5) , 19, 20.1, 21 – 25

2 See Constitution - MIDDEVON.GOV.UK
3 Agenda for Standards Committee on Wednesday, 9th February, 2022, 6.00 pm - MIDDEVON.GOV.UK
4 A Motion "to improve public accountability and to address the inequality of rights of Members of the Council, when compared to members of the public. This Council resolves that: When an enquiry is made by a Member at any formal meeting (verbally, or in writing) and a substantive answer is not given at that meeting, a written response shall be sent to the enquiring member within 10 days. Wherever possible, any written questions submitted in the absence of the Member shall be submitted in advance of the meeting, but a failure to do so will not invalidate that enquiry. A copy of the question(s) and answer(s) will be circulated to members of the committee (or Full Council) and will also attached to the minutes".
5 See Appendix A
6 This includes the Deputy Group Leader for the Liberal Democrats.

2.2 The T&FG recognised that as a whole the CPRs were not always easy to follow and that in itself had created some confusion in the rules as was apparent in the Scrutiny Committee in February 2022. The rules have developed overtime and in response to for example ad hoc amendments having been made overtime whether by individual motions or organisational or legislative changes which did not take account of other rules, some inconsistencies and gaps have crept into the CPRS. Consequently, on considering all the rules, the T&FG concluded the rules should be redrafted in their entirety as set out in Appendix B. With the exceptions set out below, the amendments do not materially change the existing rules. It is considered that the redraft serves to make the rules easier to follow by for example use of sub-headings, more consistency in wording and grouping of issues.

2.3 As indicated above, the T&FG also considered in detailed parts of the rules which have raised particular concerns in recent times. Amendments to these rules were highlighted to the political groups. Should any of these recommendations of the T&FG not be resolved, the Monitoring Officer will make appropriate amendments to Appendix B.

2.4 For completeness, the T&FG is aware that the Council's current Procedures Rules do not allow amendments to be made without such having been moved and stood adjourned (without discussion) to the next ordinary meeting of the Council[7]. This rule seeks to avoid ad hoc amendments being made 'on the hoof' to the CPRs. However, in instances where the changes have been fully considered in advance (as in the current case), this rules simply delays the Council's decision making. To avoid this unnecessary delay, it is therefore recommended that the relevant CPR be suspended for the meeting of full Council. As this technical requirement is an example of where the rules serve no useful purpose, the redraft of the CPRs in Appendix B accommodates an amendment to the relevant rule to ensure that future proposed CPR amendments which have been the subject of detailed consideration by the Standards Committee (as the committee responsible for overseeing the Constitution) there is requirement for the moved amendment to stand adjourned[8].

Recommendation 1(a): The Council Procedure Rule 25.2 be suspended to allow the following amendments to be made to the Constitution at its next meeting.

Recommendation 1(b): the Council Procedure Rules be re-drafted as outlined in Appendix B.

3. Members' Questions

3.1 The T&FG reflected on the current rules in response to some, albeit limited, concerns about Members' ability to raise questions in Cabinet and / or that the public had more rights than Members to ask questions of a committee or the Cabinet. It also considered the specific representations by the mover of

[7] Existing CPR 25.2

[8] See Appendix B at Rule 20.2

Motion 577 which Council had referred to the Standards Committee for consideration.[9]

3.2 The group appreciated from the detailed advice sent to all Members[10] in February 2022 that all Members are entitled to speak at full Council; all Members may at full Council ask questions in line with the existing CPR 13; and that councillors who were not members of a particular body did not have any general rights to speak (or therefore ask questions) but could seek the Chair's agreement to do so. It was noted that in addition, Cabinet members could attend Scrutiny Committee meetings where their decisions were 'called in', for the purpose of explaining the decisions under review (but could be asked by the committee to leave[11]); and when a PDG is considering policy development and review matters, again given their role, relevant Cabinet members were (and should be) allowed to speak[12].

3.3 It was also noted that the provisions regarding non-member requests of chairpersons to "speak" proceed on the basis that the questioner is present at the meeting. It was recognised that the public had a right to ask questions only if they were present (remotely or in person) at meetings. Similar to Members' position, in their absence, the public could ask the Chair to read out their question, but the Chair was not required to do so.

3.4 The group appreciated that as Members are appointed by their groups to committees (or in the case of ungrouped members direct), as a result of a resolution of full Council, it followed that they only had rights to speak (and vote) if they were appointed to that particular body. If that were not the case, potentially all Members would be able to participate in all committees, potentially creating full Council style participation but for the absence of a right to vote.

3.5 After considering the various views on the matter, the T&FG concluded that the existing provisions were largely appropriate. The T&FG were satisfied that non-members' involvement in meetings should remain a matter for Chair's discretion. In response to concerns in the Motion about Member Questions not always being answered in public at meetings, the group considered that it would be helpful to extend the advance notice requirement by one working day – this is currently included in the relevant redrafted rule.

Recommendation 2: Motion 577 regarding Member Questions not be accepted.

Recommendation 1(c): Council Procedure Rules regarding Public Questions be amended as set out in Appendix B Rule 10.

4. Public Questions

4.1 The T&FG considered that the right of the public to ask questions (as was the case at full Council) should not be extended to all meetings as proposed. This view was formed because (with the exception of Planning

[9] See Appendix A Document 1
[10] Letter from MO to all Members dated 11 Feb 2022
[11] Existing Committee Procedure Rule 19(h)
[12] Existing Committee Procedure Rule 18(a)

Committee) the excluded committees were limited to those performing a quasi-judicial function (i.e. licensing and standards subcommittee hearings).

4.2 The group noted from research undertaken by the Planning Chair and experience across the country, that it was not common place to have public questions at Planning Committee. Instead, as was most often the case for planning committees, interested parties had a specific right to speak. It was noted that the additional 'public question time' right potentially prejudiced planning applicants and prolonged meetings. The rights were only available to residents or businesses based in the district, thereby not open to applicants who were looking to develop in the district for the first time. Further the rights were mainly used by objectors to make lengthy representations where questions were simply added at the end of speeches, thereby prolonging meetings; with 'questioners' using the opportunity to cover points that should have (or had already) been made by them in the course of the statutory consultation period. In support of retaining public questions for Planning Committee, the group noted that on occasion new points were raised by members of the public, but the main advantage of retaining public questions was that the committee was seen to listen to the public and take account of their views on policy and material planning considerations before planning applications were determined.

4.3 More generally, it was also recognised that it was often impossible for the Chair (to whom questions were in fact directed and should respond) and difficult for officers (who often answered for the Chair) to answer public questions in committee if advance notice had not been given of the questions.

4.4 After considerable debate (and a change from its preliminary view) the group considers that the Council should retain public questions at Planning Committee, with some changes to help address the understandable concerns and improve the use of public questions in the decision making process as well as to effectively engage the public in council work. The proposed redraft of the rule (see Appendix B Rule 8) seeks to improve the general understanding of the rules in the interests of transparency and openness. Further, to help ensure questions can more likely be satisfactorily answered in public at meetings, it recommends that the informal requirement for advance notice of questions from the public be formalised. In response to concerns about how questions have been used in Planning Committee, although it first concluded that there should be a limit to the number of words to 100, to avoid questions becoming lost in a lengthy submission as is currently prevalent in Planning Committee particularly by objectors to planning applications, on reflection it didn't consider such would assist.

Recommendation 1(d): Council Procedure Rule regarding Public Questions be amended as set out in Appendix B Rule 8.

5. Members' Business

5.1 Some concerns had been expressed about the use of Members' Business (a standard item on full Council agendas) to make comments which were for example, misleading at others' expense nor matters over which the Council had powers, knowing that there was no right to discuss or respond to the points made at the meeting. It was also noted that overtime such a standard agenda item at full council meetings had become less common place amongst councils.

5.2 In terms of considering why the item should remain, the group recognised that the item provided an opportunity for Members to raise good news and points of general public interest; and further that the provisos (e.g. time limits, number of questions, exclusion of matters already covered at the same meeting) were there to ensure that this standard agenda item was manageable.

5.3 The group concluded that with some informal guidance for Members from the Monitoring Officer and 'firm and fair' chairmanship, concerns raised about the potential misuse of Members' Business would be sufficient but the matter would be kept under review.

5.4 In considering what to include in that guidance the following points are considered relevant, particularly given that there is no right to respond at the time to comments even ones which may inadvertently or otherwise amount to a breach of the Code of Conduct (e.g. by bringing the office or Council into disrepute).

(a) The ambit of Members' Business is set out in the Council's Procedure Rules.

(b) Members may together use the time permitted, to each make (only) one statement or raise one question, lasting no more than two minutes each.

(c) Members' Business can only be included on the full Council agenda for up to 15 minutes in total and so no-one group of Members should seek to monopolise that time – the Chair may for example use his discretion to select which Members may speak in that time or stop Members who misuse the agenda item.

(d) Each statement / question may only concern a matter over which the Council has powers or duties or which affects the District; and has not been otherwise before the Council for consideration at the same meeting.

(e) The topics which may be covered in the relevant statement or question is wide. However the key thing to note is that the matter concerns council business not personal or political group business.

(f) The use of Members' Business must be compatible with other parts of the Constitution in particular the high standards of conduct expected of elected members. Members must not for example bring the Council into disrepute or be disrespectful to others.

(g) Whilst ensuring that the item doesn't turn into a debate in itself, the Chair may exercise his discretion to rule that inappropriate

comments be withdrawn by the relevant member, an apology given to the Council, or for a short point of correction or clarification to be made in response.

Recommendation 1(e): Members' Business should remain on full Council agendas but Members be asked to take account of the guidance on its use in paragraph 4.4.

6. Planning Committee Procedures

6.1 The following procedural matters specific to the Planning Committee whilst outside of the CPRs were identified for consideration during the T&FG's meetings:

(a) Value of public questions with separate public rights to speak in committee given quasi-judicial role of Planning Committee;
(b) Value of implication reports;
(c) Potential conflict between ward member vs committee planning interests;
(d) Concerns about length of meetings and how meetings might be more concise without adversely affecting quality of decision making.

6.2 Item (a) was raised due to concerns about the procedures applicable to planning committee meetings. As noted in Section 4 above, the appropriateness of retaining Public Questions (given the specific public speaking rights at committee) were considered in detail.

6.3 Turning to item (b) the group had experience of the use of Implications Report in Planning Committee, which sought to provide a cooling off period for the committee to reflect on the grounds for determining an application contrary to policy and officer recommendation before a decision was confirmed. It did not form part of the CPRs but was a well-established process at the Council. It was reported that in practice particularly in the last 12 months or so, the reports had only delayed decision making and the committee had not changed its view, it being considered as a result by the senior planning officers and committee that there was no value in continuing with the practice. The members of the group noted with appropriate advice that it was reasonable to expect the costs implications to be advised upon and considered reasons to be identified by the advising officers and the committee at the meeting when applications are debated. Furthermore the group noted that in the event that it emerged subsequently that there is no reasonable prospect of the appeal being successfully defended, a further timely committee report may still be requested by the committee to help minimise the costs' risks.

6.4 Regarding (c) it was highlighted that members of the Planning Committee were undertaking a quasi-judicial role, rather than a ward representation role. There would often be conflicts between those roles (e.g. where planning policy supported a development but local residents who the member was duty bound to represent, objected). This had been evident on

several occasions at the Council. In response to such, it was noted that some authorities discouraged or prevented such Members from voting in planning committees. Such Members instead spoke as ward members, having a specific time allocated to them to do so before the committee debated the application and did not participate as a committee member. Concern had also been raised that ward members who were not members of the committee were prejudiced by not being a member of the committee, as they had less rights (to speak) on an application than committee members, therefore prejudicing their residents in comparison to those residents whose member was on the committee.

6.5 Although the T&FG recognised the clear case for changing the rules, it considered that Members fully appreciated the potential for conflict and the requirement in the Code not to use their position to improperly advantage or disadvantage another. Consequently, it was considered that such was sufficient to ensure that all members of the committee upheld their overriding responsibility to promote district planning interests above their local ward interests when sitting on the Planning Committee. In conclusion the group did not consider any change was needed.

6.6 The group touched upon a variety of other changes that might help cut down on the length of meetings where such did not prejudice the quality of the debate in Planning Committee. These included use of 'call in powers' of Members and the number of deferrals arising from the view that substantive information was not provided in sufficient time for Members to consider such or new information was needed to address concerns raised in committee. These matters were ones which concerned the operation of planning process and have not as such been considered by the T&FG. Whilst noting some issues with the current delegation to the Development Management Manager and Director of Place, it considers that Members would welcome a briefing by the Development Management Manager / Head of Place on the use of ward member call in of applications to committee.

Recommendation 1(f): The requirement for the Planning Committee to consider an Implications Report (if it proposes to determine an application contrary to policy and officer recommendation) before decision confirmed, be removed.

7. Miscellaneous Amendments to the CPRs

7.1 In considering the rules on Committee Substitutes, the group recognised that it was not always possible for members of small groups to identify a replacement where training was a requirement particularly in planning, but also other quasi-judicial committees. Consequently, the group proposes that in such instances substitutes may come from other political groups.

7.2 It was noted that the historic practice to present Committee and Cabinet minutes to full Council was not a specific requirement for full Council agendas. The group considered that agendas should still include all the minutes. This will ensure that questions may continue to be raised of the Chairs by Members without notice.

Recommendation 1(g): The rules on Substitute Members be amended so that trained substitutes may come from any group where there is no other trained Member in the permanent Members' political group.[13]

Recommendation 1(h): The practice of full Council for Chairs to have to read out minutes of each committee (including PDGs and Cabinet) be stopped.

10 June 2022

District Solicitor and Monitoring Officer
on behalf of the Task & Finish Group

[13] See Appendix B Rule 3.1(b)

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Document 1

From: Cllr Ashley Wilce <awilce@middevon.gov.uk>
Sent: 21 March 2022 09:29
To: Karen Trickey <ktrickey@middevon.gov.uk>
Subject: Re: Questions re your Motion 577 to be returned by 27 March

Good Morning Ms Trickey

Please see insertions
Regards,
Cllr Ashley Wilce
TOTALLY Independent Member for Cullompton North

From: Karen Trickey
Sent: 13 March 2022 08:48
To: Cllr Ashley Wilce
Subject: Questions re your Motion 577 to be returned by 27 March

Dear Cllr Wilce

I refer to your motion "*to improve public accountability and to address the inequality of rights of Members of the Council, when compared to members of the public"* for which you requested that the Council resolve*:*

1. *When an enquiry is made by a Member at any formal meeting (verbally, or in writing) and a substantive answer is not given at that meeting, a written response shall be sent to the enquiring member within 10 days.*
2. *Wherever possible, any written questions submitted in the absence of the Member shall be submitted in advance of the meeting, but a failure to do so will not invalidate that enquiry.*
3. *A copy of the question(s) and answer(s) will be circulated to members of the committee (or Full Council) and will also attached to the minutes."*

The Task & Finish Group (Council Procedure Rules) has considered your motion regarding changes to Member Questions within the context of the relevant Council Procedure Rule which of course only applies to full Council. The only point covered in your motion which has yet to be accommodated in some form within that context is the attachment of the question and answer to the minutes of full Council. The group has asked that I contact you to request that you clarify what you intended in your motion, it being recognised of course that your motion goes further than member questions at full Council given the references to "*any formal meeting"* and also *"members of the committee (or Full Council)*".

I have set out some specific questions which might help you to explain what you intended and which will in any event assist the group's final consideration of your motion particularly

within the context of Cabinet, PDG and committee meeting rules. Please would you let me have your response (whether to the specific queries below or otherwise) asap but no later than 27th March, so that I can consider them and relay them to the group at its next meeting on 1st April.

Questions: Regarding the application of your motion to "*any formal meeting*" it is understood that you are referring to public Cabinet, PDGs and committee meetings (for which unlike full Council meetings, there aren't specific rights for any / all members to ask questions). With that in mind:

i. *Were you primarily seeking to ensure that answers to <u>any</u> member questions (not substantively answered at the meeting) are attached to the minutes within 10 days (or even 10 working days)?*

Yes

ii. *Referring to the second numbered point above in your motion, it is understood you were only referring to a question from a member who is <u>not</u> at the meeting. You refer understandably to (i) the question being in writing and (ii) that written question being submitted in advance of the meeting. However, you pre-fix it with only "whenever possible". Could you explain the situations you had / have in mind where any written questions submitted by an absent member would not be submitted in advance to the Chair? If you meant something else, please explain.*

I did not want the fact that there was no 'notice' (or short notice) of the written question, to prevent that question being put, provided that it related to an Agenda item. See Q below.

iii. *Did you intend that the member question and answer (when a substantive answer is not given at the meeting), would be attached to the minutes in all cases i.e. when a verbal question (regardless of its content) which is not on notice is raised in the meeting, rather than for example simply for written questions on notice?*

Yes, i.e. <u>any question asked publicly, will be answered publicly, however it was put.</u>

iv. *Would the following wording which could be added to the existing rules which apply to Cabinet, PDGs and committee cover what you intended (noting that the group has already considered full Council rules): "when a question on an agenda matter is raised by a Member at a public meeting which cannot be substantively answered at the meeting, a written response shall be provided to the Member (and copied to all members of that committee / PDG or the Cabinet) within 10 working days by the Chairman (or such other person as he shall refer the matter) and attached to the minutes of the meeting" ?*

No - a response is not necessarily a substantive answer - a dodge that has been frequently used in the past.

If not, is there any other variation to your motion wording which you consider taking account of the points of clarification above, would better cover what you intended?

The constitution is unclear - do members have an absolute right to submit written questions in advance, or are there restrictions; if so, what are the restrictions, please?

Document 2

From: Cllr Graeme Barnell <gbarnell@middevon.gov.uk>
Sent: 11 March 2022 17:15…

Subject: Proposed rules of procedure

…. As part of the deliberations of the short life on committee procedures I'm concerned we have rules to ensure:-

1. All members have the right to speak and ask questions at all MDDC meetings at which they have right to attend including Cabinet and all policy and advisory committees.

2. Members of the public have the right to ask questions at all MDDC meetings at which they have right to attend.

3. Answers to members questions at all Committees are published either with the minutes of subsequently on the MDDC website.

4. Access of all members to place an item on the agenda of Scrutiny Committee is not diminished.

5. Rules are established that allow all members to request agenda items on any meeting to which they are entitled to attend. Ditto members of the public.

Document 3

Current rule	Proposal	Reason(s)
Planning Committee: Requirement for planning committee to consider an Implications Report (if it proposes to refuse an application contrary to policy and officer recommendation) before decision confirmed.	To remove the requirement *Agreed*	1. Such reports only serve to delay the determination of the matter as in practice the committee never / very rarely changes its decision when considering the Implications Report; 2. With appropriate advice, it is reasonable to expect the costs implications to be advised upon and considered reasons to be identified at the meeting when the application is debated; or otherwise the application's determination should be deferred by the committee for further consideration and information. *[May need to defer to have sound wording for 'reasons for refusal.']* 3. In the event that it emerges subsequently that there is no reasonable prospect of the appeal being successfully defended, a further committee report may still be considered when needed e.g. as happened recently. *[But done correctly and more openly and transparently.]*
All committees (with some exceptions e.g. licensing, standards hearings): Right of public to ask questions on agenda items.	Retain as is, subject to: (i) redraft for public's clarity / ease of under-standing and (ii) to formally confirm need for notice *See notes from NAG in red italics.*	The T&FG considered that the right should not be extended to all meetings as proposed, given that the only excluded committees were limited and appropriately so (e.g. licensing and standards subcommittee hearings etc.). Particular consideration was given to removing the right from Planning Committee particularly as: 1. the questions are used to make representations, which have / or could have been made in the course of the public consultation; *The public consultation responses could have been made many months before and this could be the opportunity for members of public to update their views.* 2. it often difficult to answer or understand public questions when no notice has been provided of them in advance;

		3. the questions (which often took the form of long statements of personal opinion) unduly prolonged the meetings, without significant benefit to the committee's consideration, complaints having been made by members about the lengthy of some meetings; *This is not what has prolonged the meetings as there is a 30 minute time frame for public questions. What has prolonged meetings are too many applications or complicated applications on one agenda. NAG members have put forward the view that 'Public Questions' should be renamed 'Questions and Statements by the public.' There could still be the 3 minute limit per speaker and the 30 minutes overall. The East Devon DC Constitution Para 8 is suggested as a particular preferable substitute.* 4. on occasion some questions were clearly inappropriate, including defamatory or offensive comments and in the absence of notice, it was difficult for the chair to stop the questioner early enough; *This is considered an acceptable risk in the interests of public involvement. It does not happen that often.* 5. the use of public questions at planning committee was not common place for LPAs dealing with development control applications. *MDDC should retain Public Questions/Statements.* However, it was recognised that the planning committee was the most well attended public meeting and the public valued that right which at times provided the committee with additional information pertinent to its consideration of the application. In order to address the legitimate concerns it is proposed to require advance written notice of the question (in line with informal requests for such since Covid restrictions and to limit each question to 100 words per question.[i] *The majority of NAG members do not agree with a requirement to submit questions in advance on agenda items although it could be 'advice' and encouraged. The 3 minute rule is considered sufficient restriction and there is no support for the 100 word limit.*
Council Procedure Rule summary	**[T&FG proposed change of CPRs as at 1 April 2020]**	**Response from Non-Aligned Group as at 18 April (in italics)**

Full Council: Right of members to speak and ask questions at meetings they attend	Retain as it is subject amends for clarity / ease of understanding *See notes under relevant section below.*	The T&FG concluded with some redrafting and additions for clarity/ ease of understanding of the current right at full council, the rule should be retained[ii]; and in the case of all other meetings, non-members' involvement in meetings should remain a matter for chair's discretion subject to ward members being able to speak in person at planning committee. *Agreed in principal by most but some do feel that any Member should be allowed to speak if they wish to contribute at most meetings [Planning excluded except for Ward Members.]*

[i] Public Questions

0.1 **Questions from the Public:** Residents, electors or business rate payers of the District shall be entitled to ask questions at a meeting provided that:

(a) the question(s) are relevant to an item on the Agenda for that meeting;

(b) all the questions from one ~~body~~ *person* do not exceed three minutes when read out, ~~nor 100 words for each question~~;*[No support for the word number restriction.]*

(c) at least two clear days' *[Is this meant to be two clear **working** days? Practicalities – two clear days for Environment PDG on a Tuesday means questions would be sent on a Saturday etc. etc.!!!]* written notice has been given to the Member Services Manager (via email) of the question(s) to be asked; and

(d) the questions have not been rejected in accordance with Rule 0.5.

0.2 **Time for Public Questions:** Any public questions shall be dealt with at the beginning of the Agenda and limited to 30 minutes provided that the Chairman may extend the time, or proceed to the next agenda item within such shorter period if there are no questions or all permitted questions are answered.

0.3 **Attendance:** Persons submitting questions must be present (remotely or in person) at the meeting unless the Chairman agrees to address the question in the questioner's absence.

0.4 **Order of Questions:** Questions will be asked in the order they have been received.

0.5 **Scope:** The Chairman may, following advice from either the Chief Executive, Monitoring Officer or Member Services Manager, *[Why the advice from Officers?]* reject a question giving reasons to the questioner for its rejection if it:

(a) Is not about a matter for which the Council has a responsibility or which affects the District;

(b) Is in his/her opinion scurrilous, improper, capricious, irrelevant or otherwise objectionable (e.g. spurious, vexatious);

(c) Is substantially the same as a question which has been put at a meeting to which these rules apply in the past six months;
(d) Requires the disclosure of confidential or exempt information.

0.6 **Supplementary question:** At the discretion of the Chairman questioners may ask one supplementary question.

0.7 **Answers to questions**

(a) The Chairman of the meeting (or at meetings of the Council the appropriate committee chairman), shall respond to all valid questions.
(b) Replies to questions may be verbal, in writing or by reference to a published document.
(c) Replies which are not provided at the meeting shall be reported to the next relevant meeting and published alongside the draft minutes when available and circulated to all Members.

[ii] Members' Questions

0.1 **Questions without notice:** At a meeting of the Council, other than the Annual Meeting, a Member of the Council may ask the Leader, a Cabinet Member or the Chairman of a committee any question without notice upon an item of the report of the Cabinet or a committee when that item is being received or under consideration by the Council. *Agreed.*

0.2 **Questions on notice:** A Member may ask the Chairman of the Council, the Leader, a Cabinet Member or the Chairman of any committee any question which:

(a) concerns the Council's powers / duties or which otherwise affects the District;
(b) relates to matters on which the Council has or may determine a policy; *This is felt to be too restrictive as there may be legitimate questions members wish to raise which might not be a matter of policy.*
(c) the Member has provided written notice of the question to the Chief Executive no later than noon, two clear days preceding the meeting; *[Practically does this mean noon on the Sunday before a Full Council meeting on the Wednesday?]*
(d) the question has first been discussed at a meeting of the Cabinet or committee and the Member is not satisfied with the adequacy of the answer contained in the relevant Minutes; *Considered to be too restrictive and could prevent legitimate questions and issues being raised. Most Councils give members the right to ask questions as at (a) above without any restriction that it has previously been discussed.*

and

(e) the question is not (in the opinion of the Chairman of Council taking account of the advice on the matter from the Chief Executive, Monitoring Officer or Member Services Manager):
  (i) scurrilous, improper, capricious, irrelevant or otherwise objectionable (e.g. spurious, vexatious);
  (ii) substantially the same as a question which has been put at a meeting of the Council in the past six months;
  (iii) one which requires the disclosure of confidential or exempt information and the question is not to be raised in closed session;
  (iv) one which contains expressions of opinion; *[Are members not entitled to express an opinion as the reason for the question?]* or
  (v) one which relates to questions of fact.

0.3 **Questions relating to urgent business:** A Member of the Council may, with the advance permission of the Chairman, put to him, the Leader, a Cabinet Member or the Chairman of any committee any urgent question on notice under paragraph 0.2 without complying with sub paragraph 0.2(c) above, provided that:

(a) the Chairman in his absolute discretion is satisfied that the matter raised in the question is of such urgency that compliance with sub paragraph 0.2(c) is precluded nor should its consideration be delayed until the next meeting of the Cabinet or appropriate committee; and

(b) a copy of the question has been delivered to the Chief Executive no later than 9am the day before the Council meeting.

0.4 Order of Questions on notice

(a) Questions under Rules 0.2 and 0.3 shall be taken at the appropriate point in the relevant committee report or in the absence of such, at the Members' Questions agenda item.

(b) Questions and written answers shall be printed in order of receipt and circulated amongst the Members at the commencement of the Council meeting. *[How or when do the public become aware that their representative has raised such a question?]*

(c) No discussion shall be allowed upon questions or answers save as is permitted under Rules 0.5 - 0.8 below.

0.5 Form of Response

(a) The Chief Executive shall arrange for copies of on notice questions and answers to be sent to Members not present at the Meeting of the Council.

(b) An answer may take the form of:

- a direct oral answer at the meeting;
- where the desired information is in a publication of the Council or other published work, a reference to that publication; or
- where the reply cannot conveniently be given orally, a written answer circulated within 10 working days to the questioner. *[Where do other members or the public see the answers please?]*

0.6 Supplementary question: One relevant supplementary question to an answer to a question on notice shall be allowed to the original questioner but may be disallowed or not answered if the Chairman of the Council considers it in breach of paragraph 0.2(e). *[Should we include that the Chairman should give reasons?]*

0.7 Length of Speeches: A Member asking a question under Rules 0.1 - 0.3 and a Member answering such a question may speak for no longer than three minutes unless the Chairman consents to a longer period.

0.8 Time Allowed for Questions

(a) The time allowed for consideration of all questions at full Council under Members' Questions agenda item which are submitted under this Rule 0 *[Do we have a typo?]* shall not, without the consent of the Council exceed 30 minutes.

(b) At the conclusion of the answer to the question under consideration at the expiry of 30 minutes (or such longer period to which the Council has consented) from the time when the first questioner started to speak, the Chairman shall continue with the meeting unless the Council resolves otherwise at the meeting.

(c) Any remaining questions shall be responded to in writing before the next ordinary meeting of the Council with written answers to be forwarded to all Members *[What about the public? Will the questions and answers be published alongside the minutes?]*

Council Procedure Rules

Introduction:

There are currently 20 procedure rules. They apply to all meetings of full Council (i.e. when all Members of the Council attend as voting members). Subject to the exceptions set out below in Rule 1 or where the rules provides or the context otherwise makes clear, they also apply to Cabinet and **Committees** (which latter term for the purposes of these rules, includes their sub-committees and Policy Development Groups).

1. Exceptions of Rules to Committees Meetings
2. Full Council
3. Substitute Members
4. Time Place and Notice of Meetings
5. Chairman of the Meeting
6. Quorum
7. Members' Business at full Council
8. Questions by the Public
9. Petitions from the Public
10. Questions from Members at full Council
11. Motions
12. Rules of Debate
13. State of District Debate
14. Previous Decisions and Motions
15. Voting
16. Minutes
17. Exclusion of the Public
18. Members' Conduct
19. Disturbance by the Public
20. Suspension and Amendment of Council Procedure Rules

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1. Exceptions of Rules to Committee Meetings

Committee	Rules which don't apply
Audit	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Cabinet	No appointment of Substitutes (Rule 3) Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Electoral Review	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Policy Development Groups (**PDGs**)	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Licensing	No appointment of Substitutes for sub-committees (Rule 3) Members' Business (Rule 7) Public Questions for sub-committees (Rule 8) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Planning	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Regulatory	No appointment of Substitutes for sub-committees (Rule 3) Members' Business (Rule 7) Public Questions for sub-committees (Rule 8) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Scrutiny	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Standards	No appointment of Substitutes for sub-committees (Rule 3) Members' Business (Rule 7) Public Questions for sub-committees (Rule 8) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)

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2. Full Council

2.1 Annual Meeting

2.1.1 Timing and business: In a year when there is an ordinary election of councillors, the annual meeting will take place within 21 days of the retirement (four days after the election) of the outgoing councillors. In any other year, the annual meeting will take place in March, April or May.

2.1.2 Business: The annual meeting will:

(a) elect a person to preside if the outgoing Chairman of Council or Vice Chairman of the Council is not present;
(b) elect the Chairman of the Council (subject to the statutory provisions in that behalf, a Councillor who is the present Chairman of the Council and has completed two consecutive years in such office shall not be eligible for re-election as Chairman of the Council for the ensuing year);
(c) elect the Vice Chairman of the Council;
(d) approve the minutes of the last meeting of the Council;
(e) receive any announcements from the Chairman and/or the Chief Executive;
(f) elect the Leader (following the ordinary election of councillors);
(g) elect the Scrutiny Committee Chairman;
(h) approve a programme of ordinary meetings of the Council for the year; and
(i) consider any *other* business set out in the notice convening the meeting.

2.1.3 Appointment of Committees: At the Annual Meeting, the Council meeting will:

(a) decide which Committees to establish for the municipal year;
(b) decide the size and terms of reference for those Committees;
(c) decide the allocation of seats to political groups in accordance with the political balance rules;
(d) receive nominations of (any) ungrouped councillors to serve on each Committee and vote on each appointment
(e) make appointments to outside bodies except where appointment to those bodies has been delegated by the Council or is exercisable only by the Cabinet (in respect of Executive functions);

2.2 Ordinary Meetings

2.2.1 Business: The order of business at ordinary meetings will be as follows:

(a) elect a person to preside if the Chairman and Vice Chairman are not present;
(b) approve the minutes of the last meeting (whether the annual meeting or otherwise);
(c) receive any declarations of interest from Members;
(d) receive any announcements from the Chairman;
(e) receive Public Questions (as set out in Rule 8);

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(f) receive a report from the Leader and receive questions and answers on the report;
(g) deal with any business remaining from the last Council meeting;
(h) receive petitions from members of the public;
(i) debate single issues;
(j) consider Motions;
(k) consider recommendations from the Cabinet;
(l) consider any recommendations submitted by the Council's Committees;
(m) receive reports about and receive questions and answers on the business of joint arrangements and external organisations;
(n) receive Members' Business (as set out in Rule 7);
(o) consider any urgent items of business brought forward at the discretion of the Chairman and the reason for urgency must be announced at the meeting and recorded in the minutes;

and

(p) consider any other business specified in the summons to the meeting.

2.2.2 Variation of Order of Business: Business falling under items 2.2.1 shall not be displaced, but subject thereto the order of business may be varied:

(a) by the Chairman at his/her discretion; or
(b) by a resolution passed on a Motion (which need not be in writing) duly moved and seconded, which shall be moved and put without discussion.

2.3 Extraordinary Meetings

2.3.1 Those listed below may request the Proper Officer to call Council meetings in addition to Ordinary Meetings:

(a) the Council by resolution;
(b) the Chairman of the Council;
(c) the Monitoring Officer; or
(d) any five Members of the Council if they have signed a requisition presented to the Chairman of the Council and he has refused to call a meeting or has failed to call a meeting within seven days of the presentation of the requisition.

2.3.2 The business to be conducted at an extraordinary meeting shall be restricted to the item of business contained in the request for the extraordinary meeting and there shall be no consideration of previous minutes or reports from Cabinet or Committees etc. except that the Chairman may at his absolute discretion permit other items of business to be conducted for the efficient discharge of the Council's business.

3. <u>Substitute Members</u>

3.1 Appointment

Where a member is appointed to a Committee or any committee / sub-committee of another council on which the District Council is represented, the member may appoint a substitute member to attend the meeting subject to the following qualification requirements:

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(a) In the case of the Audit, Licensing, Planning, Regulatory and Standards committees, all substitute members must have received training on the relevant committee's area of work.
(b) Where the Member appointing a substitute is a Member of a Political Group the substitute Member shall only be from the membership of that same group unless there are no such trained members in that group.

3.2 Extent of the Substitution

3.2.1 Any such substitution shall have effect for the entirety of the meeting in respect of which the Notice has been given.

3.2.2 No more than two Members of the same Political Group shall be substituted at any meeting and no Member shall be substituted at more than two consecutive meetings of the same Committee.

3.2.3 Substitute Members may only attend meetings in that capacity where:

(a) the ordinary Member will be absent for the whole of the meeting;
(b) the ordinary Member has notified the Member Services Manager by email of the intended substitution at least one hour before the start of the relevant meeting; and
(c) in the case of area committees the substitution does not alter the balance on that committee between Members from the area and Members from the rest of the District.

4. <u>Time, Place and Notice of Meetings</u>

4.1 The time and place of meetings will be determined by the Chief Executive and notified in the summons.

4.2 The Chief Executive will give notice to the public of the time and place of any meeting in accordance with the Access to Information Procedure Rules.

4.3 At least five clear working days before a meeting, the Chief Executive approved will send a summons approved by him/her to every Member of the Council. The summons will give the date, time and place of each meeting and specify the business to be transacted, and will be accompanied by such reports as are available.

5. <u>Chairman of the Meeting</u>

5.1 The person presiding at the meeting may exercise any power or duty of the Chairman.

5.2 The Chairman of the Council, by virtue of office, is not eligible to hold office as a Chairman of any other committee during his/her term.

5.3 The ruling of the Chairman as to the construction or application of any of these Procedure Rules, or as to any proceedings of the Council, shall not be challenged at any meeting.

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5.4 When the Chairman stands during a debate, any member speaking at the time must stop and sit down. The meeting must be silent.

6. Quorum

6.1 The quorum of a full Council meeting will be one quarter of the whole number of Members (rounded up) present at the meeting where physical presence is required (or in attendance including remotely where such physical presence is not required).

6.2 The quorum for a meeting of the Cabinet and any Committees will be one half of the number of members appointed to that body (rounded up) subject to a minimum of three in each case.

6.3 During any meeting if the Chairman counts the number of Members present and declares there is not a quorum present the meeting will adjourn and remaining business will be considered at a time and date fixed by the Chairman or failing such, at the next ordinary meeting.

7. Members' Business

7.1 At each ordinary meeting of the full Council, a period not exceeding 15 minutes shall be allowed during which any Member may make a statement or give preliminary verbal notice of a question provided that:

(a) such statement or question must be relevant to some matter in relation to which the Council has powers or duties, or which affects the District and has not been otherwise before the Council for consideration at the same meeting;
(b) no Member may make more than one statement or give notice of more than one question;
(c) no Member shall speak pursuant to this Procedure Rule for longer than two minutes;
(c) the statement or notice of question shall not be the subject of discussion or reply at that meeting;
(d) after the expiry of the said period of 15 minutes the Council shall proceed to the next business; and
(e) such statement or question is not (in the opinion of the Chairman) scurrilous, improper, capricious, irrelevant or otherwise objectionable.

8. Questions from the Public

8.1 Residents, electors or business rate payers of the District shall be entitled to ask questions at a meeting provided that:

(a) the question(s) are relevant to an item on the Agenda for that meeting;
(b) all the questions from one body shall not exceed three minutes when read out;
(c) written notice has been given to the Member Services Manager by noon plus one clear working day before the meeting (via email or otherwise as he / she agrees) of the question(s) to be asked; and
(d) the questions have not been rejected in accordance with Rule 8.5.

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8.2 **Time for Public Questions**

Any public question shall be dealt with at the beginning of the Agenda and limited to 30 minutes provided that the Chairman may extend the time, or proceed to the next agenda time within the shortened period if there are no questions or all permitted questions are answered.

8.3 **Attendance**

Persons submitting questions must be present (remotely or in person) at the meeting unless the Chairman agrees to address the questions in the questioner's absence.

8.4 **Order of Questions**

Questions will be asked in the order they have been received.

8.5 **Scope**

The Chairman may, following advice from either the Chief Executive, Monitoring Officer or Member Services Manager, reject a question giving reasons for that rejection, if it:

(a) Is not about a matter for which the Council has a responsibility or which affects the District;
(b) Is in his/her opinion scurrilous, improper, capricious, irrelevant or otherwise objectionable;
(c) Is substantially the same as a question which has been put at a meeting to which these rules apply in the past six months; or
(d) Requires the disclosure of confidential or exempt information.

8.6 Supplementary question

At the discretion of the Chairman questioners may ask one supplementary question.

8.7 Answers to questions

8.7.1 The Chairman or at meetings of the Council the appropriate Committee chairman, shall respond to all valid questions.

8.7.2 Replies to questions may be verbal in writing or by reference to a published document.

8.7.3 Replies which are not provided at the meeting shall be reported to the next relevant meeting by publishing them alongside the draft minutes when available and by circulating them to all Members.

9. <u>Petitions from the Public to full Council</u>

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9.1 Notice of Petition

9.1.1 If a citizen wishes to present a petition to a Council meeting, notice must be given at least 10 working days before the meeting.

9.1.2 Petitions to be debated at the Council Meeting will have been selected according to the Petitions Scheme (which is attached as Appendix D to the Constitution).

9.2 Presentation of Petitions

9.2.1 The petition organiser will be allowed 5 minutes to present the petition at the meeting.

9.2.2 Only one person may speak to present a petition.

9.2.3 The Council will debate a single petition for a maximum of 15 minutes (if the petition has 1500 signatures or more).

9.2.4 The Council's response to the petition may include one or more of the following:

(a) taking the action requested in the petition;
(b) not taking the action requested in the petition;
(c) considering the petition at a council meeting;
(d) holding an inquiry into the matter;
(e) undertaking research into the matter;
(f) holding a public meeting;
(g) holding a consultation;
(h) holding a meeting with the petitioners;
(i) calling a referendum;
(j) referring the petition for consideration by other committees such as the Scrutiny Committee;
(k) where the issue is one on which the Cabinet is required to make the final decision, the Council will decide whether to make recommendations to inform that decision;
(l) the petition organiser will receive a written acknowledgement of receipt of their petition, details as to when and where their petition will be considered and a letter giving the outcome which will also be published on the Council website.

9.3 Scope of Petitions

9.3.1 The Member Services Manager may reject a petition if it:

(a) does not qualify under the scheme;
(b) does not follow the Council's guidelines for submitting a petition;
(b) it is vexatious, abusive or otherwise inappropriate;
(c) it is a petition qualifying under another enactment;
(d) it relates to a planning, licensing or other regulatory decision;

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(e) it relates to any other matter relating to an individual or entity in respect of which that individual or entity has a right of recourse to a review or right of appeal conferred by or under any enactment.

10. Questions from Members at full Council

10.1 Question without notice on reports of the Cabinet and Committees

At an Ordinary meeting of the full Council a Member of the Council may ask the Leader, Cabinet Members or the Chairman of a Committee any question without notice upon an item of the report of the Cabinet or a Committee when that item is being received or under consideration by the Council.

10.2 Questions on notice at full Council

A Member of the Council may, ask the Chairman of the Council, the Leader, a Cabinet Member or the Chairman of any Committee any question which:

(a) concerns the Council's powers / duties or which otherwise affects the District;
(b) relates to matters on which the Council has or may determine a policy;
(c) the Member has provided written notice of the question to the Chief Executive no later than noon, two clear days preceding the Council meeting;
(d) the question has first been discussed at a meeting of the Cabinet or Committee and the Member is not satisfied with the adequacy of the answer contained in the relevant Minutes;

and

(e) the question is not (in the opinion of the Chairman taking account of the advice on the matter from the Chief Executive, Monitoring Officer or Member Services Manager) one which:
    (i) is scurrilous, improper, capricious, irrelevant or otherwise objectionable
    (ii) is substantially the same as a question which has been put at a meeting of the Council (or other meeting to which these rules apply) in the past six months;
    (iii) requires the disclosure of confidential or exempt information unless the question is raised in closed session;
    (iv) contains expressions of opinion; or
    (v) relates to questions of fact.

10.3 Questions relating to urgent business

A Member of the Council may, with the advance permission of the Chairman, put to him, the Leader, a Cabinet Member or the Chairman of any Committee any question relating to urgent business of which notice has not been given in accordance with paragraph 10.2(c) above, provided that:

(a) the Chairman in his absolute discretion is satisfied that the matter being raised is of such urgency that compliance with paragraph 10.2(c) is precluded nor should its consideration be delayed until the next meeting of the Cabinet tor the Committee; and
(b) a copy of any such question has been delivered to the Chief Executive no later than 9am the day before the Council meeting.

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10.4 Order of Questions

10.4.1 Questions under 10.2 and 10.3 shall be taken at the appropriate point in the relevant Committee report or in the absence of such, at the Members' Questions agenda item.

10.4.2 Questions and written answers shall be printed in order of receipt and circulated amongst the Members at the commencement of the Council meeting.

10.4.3 No discussion shall be allowed upon questions or answers save as is permitted under Rules 10.5 to 10.8 below.

10.5 Form of Response

10.5.1 The Chief Executive shall arrange for copies of questions and answers to be sent to Members not present at the Meeting of the Council.

10.5.2 An answer may take the form of:

(a) a direct oral answer at the meeting;
(b) where the desired information is in a publication of the Council or other published work, a reference to that publication; or
(c) where the reply cannot conveniently be given orally, a written answer circulated within 10 working days to the questioner and all Members.

10.6 Supplementary question

One relevant supplementary question to an answer to a question on notice shall be allowed to the original questioner but may be disallowed or not answered if the Chairman of the Council considers it in breach of paragraph 10.2(e).

10.7 Length of Speeches

A Member asking a question under Rules 10.1 to 10.3 and a Member answering such a question may speak for no longer than three minutes unless the Chairman consents to a longer period.

10.8 Time Allowed for Questions

10.8.1 The time allowed for consideration of all questions at full Council which are submitted under Rule 10 shall not, without the consent of the Council, exceed 30 minutes.

10.8.2 At the conclusion of the answer to the question under consideration at the expiry of 30 minutes (or such longer period to which the Council has consented) from the time when the first questioner started to speak, the Chairman shall continue with the meeting unless the Council resolves otherwise at the meeting.

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10.8.3 Any remaining questions shall be responded to in writing before the next ordinary meeting of the Council with written answers to be forwarded to all Members.

11. Motions

11.1 Motions on Notice

11.1.1 **Notice:** Except for motions which can be moved without notice under Rule 11.7, written notice of every motion, must be delivered to the Chief Executive via Member Services at least eight clear working days before the Council meeting at which it is to be considered.

11.1.2 **Record of Motions:** Motions received will be entered in a record, in the order they are received, which is open to public inspection. Where a motion is rejected, the record need only comprise a summary giving reason(s) why it was rejected.

11.1.3 **Motion set out in Summons:** The Chief Executive shall set out in the Summons for every meeting of the Council all Motions of which notice has been duly given in the order in which they have been received, unless:

(a) The motion is rejected in accordance with Rule 11.5; or
(b) The Member giving such a notice intimated in writing, when giving it, that he/she proposed to move it at some later meeting or has since withdrawn it in writing.

11.1.4 **Motion not moved:** Subject to 11.1.7 if a Motion set out in the Summons is not moved either by a Member who gave notice or by some other Member on his behalf it shall, unless postponed by resolution of the Council, be treated as withdrawn and shall not be moved without fresh notice.

11.1.5 **Speaking on the Motion:** Those moving and seconding the Motion at the Council meeting shall be invited to speak on the Motion. In the event that the Motion stands referred to another body as provided for in 11.1.6 the mover (or in his absence, the seconder) of the Motion shall be invited to the relevant meeting to amplify the Motion, but without any right to vote except as a member of the Cabinet or relevant Committee.

11.1.6 **Reference to Committee:** If the subject matter of any Motion, of which notice has been duly given comes within the province of the Cabinet or a Committee, it shall, after being formally moved and seconded (with those moving and seconding the motion having been given the opportunity to speak on the Motion), either:

(a) stand referred to the Cabinet or the most relevant Committee as the Chairman may determine for consideration and report; or
(b) on an alternative motion being put forward and accepted, be dealt within in accordance with that alternative motion.

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11.1.7 **Consideration by full Council:** The Chairman of Council may if he considers it convenient and conducive to the despatch of business allow the Motion to be dealt with at the meeting, at which it is brought forward.

11.1.8 **Scope of Motions on Notice:** Motions must:

(a) be about matters for which the Council has a responsibility or which affect the District; and
(b) not, in the opinion of the Chief Executive be out of order, illegal, irregular or improper.

11.1.9 If a motion is not within scope, the Chief Executive shall as soon as is practicable, submit the notice of motion to the Chairman of the Council and the motion shall not be accepted nor placed on the agenda without the Chairman's sanction.

11.1.10 In the event of non-acceptance, the Chief Executive shall inform the member giving notice as soon as reasonably possible of the reason(s) for the rejection.

11.2 Motion on Notice to Remove the Leader

In order for such a motion to be carried it must have the support of the majority of those members voting and present in the room at the time the question was put.

11.3 Motions without Notice

11.3.1 The following motions may be moved without notice:

(a) to appoint a Chairman of the meeting at which the motion is moved;
(b) in relation to the accuracy of the minutes;
(c) to change the order of business in the agenda;
(d) to adopt a recommendation on some other course of action arising from a report to the meeting or as a result of a petition submitted to the meeting or recommendation arising from single issue debate
(e) to refer something to an appropriate body or individual;
(f) to appoint a committee or member arising from an item on the summons for the meeting;
(g) to receive reports or adoption of recommendations of Committees or officers and any resolutions following from them;
(h) to withdraw a motion which may be moved in accordance with this procedure rule;
(i) to amend a motion which may be moved in accordance with this procedure rule, subject to the provisions of the Budget and Policy Framework Procedure Rules in relation to amendment of the Cabinet's proposals for the Council's Budget and Policy Framework;
(j) to proceed to the next business (such Motion may only be moved by a Councillor who has not spoken in the debate)
(k) that the question be now put (such Motion may only be moved by a Councillor who has not spoken in the debate)

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(l) to adjourn a debate;
(m) to adjourn a meeting;
(n) to suspend a particular Council Procedure Rule;
(o) to exclude the public and press in accordance with the Access to Information Procedure Rules;
(p) not to hear further a Member named under Rule 18.2 or excluded from the meeting under Rule 18.3; and
(q) to give the consent of the Council where its consent is required by this Constitution.

12. Rules of Debate

12.1 No speeches may be made unless the appropriate Notice has been given and until the Motion is seconded; or the appropriate Notice has been given and is moved by the Chairman of the meeting.

12.2 When seconding a motion or amendment, a member may reserve their speech until later in the debate.

12.3 Content and length of speeches

12.3.1 Speeches must be directed to the question under discussion or to a personal explanation or point of order.

12.3.2 No speech shall exceed:

(a) Five minutes in the case of the mover of a Motion;
(b) Three minutes in the case of the seconder;
(c) Five minutes in the case of the Leader, the relevant Cabinet Member or the Chairman of a Committee dealing with the matters arising from committee reports except with the consent of the Chairman who shall have discretion to extend that time if it appears prudent in his judgement to do so;
(d) Three minutes in all other cases except by consent of the Council; and
(e) When the Council's annual budget is under discussion, the leader of each political group on the Council may speak for up to five minutes or such longer period as the Chairman shall allow.

12.4 When a Member may speak again

A member who has spoken on a motion may not speak again whilst it is the subject of debate, except:

(a) to speak once on an amendment moved by another member;
(b) to move a further amendment if the motion has been amended since he/she last spoke;
(c) if his/her first speech was on an amendment moved by another member, to speak on the main issue (whether or not the amendment on which he/she spoke was carried);
(d) in exercise of a right of reply;
(e) on a point of order; and
(f) by way of personal explanation.

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12.5 Amendments to motions

An amendment to a motion must be relevant to the motion and will either be:

(a) to refer the matter to an appropriate body or individual for consideration or reconsideration;
  (i) to leave out words;
  (ii) to leave out words and insert or add others; or
  (iii) to insert or add words
  (iv) as long as the effect of (i) to (iii) is not to negate the motion.

(b) Only one amendment may be moved and discussed at any one time. No further amendment may be moved until the amendment under discussion has been disposed of provided that the Chairman may permit two or more amendments to be discussed (but not voted on) together if circumstances suggest that this course of action would facilitate the proper conduct of the Council's business.

(c) If an amendment is not carried, other amendments to the original motion may be moved.

(d) If an amendment is carried, the motion as amended takes the place of the original motion. This becomes the substantive motion to which any further amendments are moved.

(e) After an amendment has been carried, the Chairman will read out the amended motion before accepting any further amendments, or if there are none, put it to the vote.

12.6 Alteration of motion

12.6.1 A Member may alter a motion of which he/she has given notice with the consent of the meeting. The meeting's consent will be signified without discussion.

12.6.2 A Member may alter a motion which he/she has moved without notice with the consent of both the meeting and the seconder. The meeting's consent will be signified without discussion.

12.6.3 Only alterations which could be made as an amendment may be made.

12.7 Withdrawal of motion

12.7.1 A Member may withdraw a motion which he/she has moved with the consent of both the meeting and the seconder.

12.7.2 The meeting's consent will be signified without discussion.

12.7.3 No member may speak on the motion after the mover has asked permission to withdraw it unless permission is refused.

12.8 Right of reply

12.8.1 The mover of a motion has a right to reply at the end of the debate on the motion, immediately before it is put to the vote.

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12.8.2 If an amendment is moved, the mover of the original motion has the right of reply at the close of the debate on the amendment, but may not otherwise speak on it.

12.8.3 The mover of the amendment has no right of reply to the debate on his/her amendment.

12.9 Motions which may be moved during debate

When a motion is under debate, no other motion may be moved except the following procedural motions:

(a) to withdraw a motion;
(b) to amend a motion;
(c) to proceed to the next business;
(d) that the question be now put;
(e) to adjourn a debate;
(f) to adjourn a meeting;
(g) to exclude the public and press in accordance with the Access to Information Procedure Rules; and
(h) Not to hear further a Member named under Rule 18.2 or excluded from the meeting under Rule 18.3.

12.10 Closure motions

12.10.1 A Member may move, without comment, the following motions at the end of a speech of another Member:
(a) to proceed to the next business;
(b) that the question be now put;
(c) to adjourn a debate; or
(d) to adjourn a meeting.

12.10.2 If a motion to proceed to next business is seconded and the Chairman considers the item has been sufficiently discussed, he/she will give the mover of the original motion (if there is one) a right of reply and then put the procedural motion to the vote.

12.10.3 If a motion that the question be now put is seconded and the Chairman considers the item has been sufficiently discussed, he/she will put the procedural motion to the vote. If it is passed he/she will give the mover of the original motion (if there is one) a right of reply before putting his/her motion to the vote.

12.10.4 If a motion to adjourn the debate or to adjourn the meeting is seconded and the Chairman considers the item has not been sufficiently discussed and cannot reasonably be so discussed on that occasion, he/she will put the procedural motion to the vote without giving the mover of the original motion the right of reply.

12.11 Point of Order

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A point of order is a request from a member to the Chairman to rule on an alleged irregularity in the procedure of the meeting. A member may raise a point of order at any time. The Chairman will hear them immediately. A point of order may only relate to an alleged breach of procedure set out in these Council Rules of Procedure or the law. The member must indicate the rule or law and the way in which he/she considers it has been broken. The ruling of the Chairman on the matter will be final.

12.12 Personal explanation

A member may make a personal explanation at any time. A personal explanation may only relate to some material part of an earlier speech by the member which may appear to have been misunderstood in the present debate. The ruling of the Chairman on the admissibility of a personal explanation will be final.

13 State of the District Debate

13.1 Calling of the debate

The Leader may call a state of the District debate annually on a date to be agreed with the Chairman.

13.2 Form of the debate

The Leader will decide the form of the debate with the aim of enabling the widest possible public involvement and publicity. This may include holding workshops and other events prior to or during the state of the District debate.

13.3 Chairing of the debate

The debate will be chaired by the Chairman.

13.4 Results of the debate

13.4.1 The results of the debate will be:

(a) disseminated as widely as possible within the community and to agencies and organisations in the area; and
(b) considered by the Leader in proposing the Budget and Policy Framework to the Council for the coming year.

13.4.2 If the Leader fails to call a debate within nine months in any municipal year, it may be called by notice in writing to the Chief Executive signed by any 10 Members of the Council and that the debate shall be heard on the subject and form specified by those 10 Members.

14. Previous Decisions and Motions

14.1 Motion to rescind a previous decision

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A motion or amendment to rescind a decision made at a meeting of Council within the past six months cannot be moved unless the notice of motion is signed by at least 10 Members.

14.2 Motion similar to one previously rejected

14.2.1 This Procedure Rule 14.2 shall not apply to Motions moved in pursuance of a recommendation of a Committee.

14.2.2 A motion or amendment in similar terms to one that has been rejected at a meeting of Council in the past six months cannot be moved unless the notice of motion or amendment is signed by at least ten members.

14.2.3 Once the motion or amendment is dealt with, no one can propose a similar motion or amendment for six months.

15. <u>Voting</u>

15.1 Majority

Unless this Constitution provides otherwise, any matter will be decided by a simple majority of those members voting and present in the room at the time the question is put.

15.2 Chairman's casting vote

If there are equal numbers of votes for and against, the Chairman will have a second or casting vote. There will be no restriction on how the Chairman chooses to exercise a casting vote.

15.3 Method of Voting

Unless a recorded vote is demanded under Rule 15.4 the Chairman will take the vote by show of hands, or if there is no dissent, by the affirmation of the meeting.

15.4 Recorded vote

If 10 Members present at the meeting demand it, the names for and against *the motion or amendment or abstaining from voting will be taken down in* writing and entered into the minutes.

15.5 Right to require individual vote to be recorded

Where any Member requests it immediately after the vote is taken, their vote will be recorded in the minutes to show whether they voted for or against the motion or abstained from voting.

15.6 Voting on appointments

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15.6.1 If there are more than two people nominated for any position to be filled and there is not a clear majority of votes in favour of one person, then the name of the person with the least number of votes will be taken off the list and a new vote taken.

15.6.2 The process will continue until there is a majority of votes for one person.

15.7 Voting on the Budget and Council Tax

At a Budget meeting, the vote on any motion or amendment relating to the setting of the Budget (revenue and capital budget) and Council Tax or precept shall be by roll call and the names of Members who voted as for, against or in abstention to any such motion or amendment shall be recorded in the minutes of that meeting.

16. Minutes

16.1 Signing the minutes

16.1.1 The Chairman will sign the minutes of the proceedings at the next suitable meeting.
16.1.2 The Chairman will move that the minutes of the previous meeting be signed as a correct record.
16.1.3 The only part of the minutes that can be discussed is their accuracy.

16.2 No requirement to sign minutes of previous meeting at an Extra-ordinary meeting

Where in relation to any meeting, the next meeting for the purpose of signing the minutes is a meeting called under paragraph 3 of Schedule 12 to the Local Government Act 1972 (an extraordinary meeting), then the next following meeting (being a meeting called otherwise than under that paragraph) will be treated as a suitable meeting for the purposes of paragraph 41(1) and (2) of Schedule 12 relating to signing of minutes.

16.3 Form of minutes

Minutes will contain all motions and amendments in the exact form and order the Chairman put them.

17. Exclusion of Public

Members of the public and press may only be excluded either in accordance with the Access to Information Procedure Rules in Part 4 of this Constitution or Rule 19 (Disturbance by Public) or otherwise permissible in law.

18. Members' Conduct

18.1 Speaking at meetings

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18.1.1 When a Member speaks at full Council he/she must address the meeting through the Chairman.
18.1.2 If more than one Member signifies their intention to speak, the Chairman will ask one to speak.
18.1.3 Other Members must remain silent whilst a Member is speaking unless they wish to make a point of order or a point of personal explanation.

18.2 Member not to be heard further

18.2.1 If a Member persistently disregards the ruling of the Chairman by behaving improperly or offensively or deliberately obstructs business, the Chairman may move that the member not be heard further.
18.2.2 If seconded, the motion will be voted on without discussion.

18.3 Member to leave the meeting

18.3.1 If the Member continues to behave improperly after such a motion is carried, the Chairman may move that either the Member leaves the meeting or that the meeting is adjourned for a specified period.
18.3.2 If seconded, the motion will be voted on without discussion.

18.4 General disturbance

If there is a general disturbance making orderly business impossible, the Chairman may adjourn the meeting for as long as he/she thinks necessary.

19. <u>Disturbance by the Public</u>

19.1 Removal of member of the public

19.1.1 If a member of the public interrupts proceedings, the Chairman will warn the person concerned.
19.1.2 If they continue to interrupt, the Chairman will order their removal from the meeting room.

19.2 Clearance of part of meeting room

If there is a general disturbance in any part of the meeting room open to the public, the Chairman may call for that part to be cleared.

20. <u>Suspension and Amendment of Council Procedure Rules</u>

20.1 Suspension

All of these Council Rules of Procedure except Rules 5.3, 15.5, 16.3 may be suspended by motion on notice or without notice if at least one half of the whole number of members of the Council are present. Suspension can only be for the duration of the meeting.

20.2 Amendment

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Any motion to add to, vary or revoke these Council Rules of Procedure will, when proposed and seconded, stand adjourned without discussion to the next ordinary meeting of the Council unless the amendment is the subject of a report from the Standards Committee.

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SECTION 1 - Council Procedure Rules

Introduction:

There are currently 20 procedure rules. They apply to all meetings of full Council (i.e. when all Members of the Council attend as voting members). Subject to the exceptions set out below in Rule 1 or where the rules provides or the context otherwise makes clear, they also apply to Cabinet **and Committees** (which latter term for the purposes of these rules, includes their sub-committees and Policy Development Groups).

1. Exceptions of Rules to Committees Meetings

2. Full Council

3. Substitute Members

4. Time Place and Notice of Meetings

5. Chairman of the Meeting

6. Quorum

7. Members' Business at full Council

8. Questions by the Public

9. Petitions from the Public

10. Questions from Members at full Council

11. Motions

12. Rules of Debate

13. State of District Debate

14. Previous Decisions and Motions

15. Voting

16. Minutes

17. Exclusion of the Public

18. Members' Conduct

19. Disturbance by the Public

20. Suspension and Amendment of Council Procedure Rules

~~1~~1. Exceptions of Rules to Committee Meetings

Committee	Rules which don't apply
Audit	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Cabinet	No appointment of Substitutes (Rule 3) Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Electoral Review	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Policy Development Groups (**PDG's**)	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Licensing	No appointment of Substitutes for sub-committees (Rule 3) Members' Business (Rule 7) Public Questions for sub-committees (Rule 8) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Planning	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Regulatory	No appointment of Substitutes for sub-committees (Rule 3) Members' Business (Rule 7) Public Questions for sub-committees (Rule 8) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)

Scrutiny	Members' Business (Rule 7) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)
Standards	No appointment of Substitutes for sub-committees (Rule 3) Members' Business (Rule 7) Public Questions for sub-committees (Rule 8) No motions other than those referred by full Council (Rule 11) No restriction on the number of times a member can speak during debate (Rule 12)

2. ~~Annual Meeting of the~~ Full Council

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2.1 Annual Meeting

2.1.1 **Timing and business:**

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In a year when there is an ordinary election of councillors, the annual meeting will take place within 21 days of the retirement (four days after the election) of the outgoing councillors. In any other year, the annual meeting will take place in March, April or May.

2.1.2 **Business:** The annual meeting will:

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(a) elect a person to preside if the outgoing Chairman of Council or Vice Chairman of the Council is not present;

(b) elect the Chairman of the Council (subject to the statutory provisions in that behalf, a Councillor who is the present Chairman of the Council and has completed two consecutive years in such office shall not be eligible for re-election as Chairman of the Council for the ensuing year);

(c) elect the Vice Chairman of the Council;

(d) approve the minutes of the last meeting of the Council;

(e) receive any announcements from the Chairman and/or the ~~Head of Paid Service~~Chief Executive;

(f) elect the Leader (following the ordinary election of councillors);

(g) elect the Scrutiny Committee Chairman;

(h) ~~agree the scheme of delegations as set out in Part 3 of this Constitution~~ approve a programme of ordinary meetings of the Council for the year; and

(i) consider any *other* business set out in the notice convening the meeting.

~~1.2~~2.1.3 **Appointment of Committees:** ~~and Selection of Councillors on Outside Bodies~~

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At the ~~a~~Annual ~~m~~Meeting, the Council meeting will:

(a) decide which committees to establish for the municipal year;

(b) decide the size and terms of reference for those ~~c~~Committees;

(c) decide the allocation of seats to political groups in accordance with the political balance rules;

(d) receive nominations of (any) ungrouped Councillors to serve on each ~~c~~Committee and vote on each appointment

(e) make appointments to outside bodies except where appointment to those bodies has been delegated by the Council or is exercisable only by the Cabinet (in respect of ~~e~~Executive functions);

2.2 Ordinary Meetings

2.2.1 **Business:** ~~Ordinary meetings of the Council will take place in accordance with a programme decided at the Council's annual meeting.~~ The order of business at ordinary meetings will be as follows:

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(a) elect a person to preside if the Chairman and Vice Chairman are not present;

(b) approve the minutes of the last meeting (whether the annual meeting or otherwise);

(c) receive any declarations of interest from Members;

(d) receive any announcements from the Chairman;

(e) receive ~~questions from, and provide answers to, the public in relation to matters which in the opinion of the Chairman are relevant to the Council's functions or business of the meeting~~Public Questions (as set out in Rule 8);

(f) receive a report from the Leader and receive questions and answers on the report;

(g) deal with any business remaining from the last Council meeting;

(h) receive petitions from members of the public;

(i) debate single issues;

(j) consider Motions;

(k) consider ~~reports~~ recommendations from the Cabinet ;

(l) consider any ~~reports~~ recommendations submitted by the ~~Scrutiny Committee and the other~~ Council's ~~c~~Committees;

(m) receive reports about and receive questions and answers on the business of joint arrangements and external organisations;

(n) receive ~~statement made and notices of future questions given by~~ Members' Business (as set out in Rule 7);

(o) consider any urgent items of business brought forward at the discretion of the Chairman and ~~. In respect of any such urgent items of business, the Chairman must be satisfied that the item of business is urgent~~

~~enough to justify its inclusion on the agenda. T~~the reason for urgency must be announced at the meeting and recorded in the minutes~~. The discretion as to urgency is entirely with the Chairman~~; and

(p) consider any other business specified in the summons to the meeting~~. and reports of the Scrutiny Committee for debate;~~

2.2.2 **Variation of Order of Business:**

~~B~~Business falling under items 2.2.1 ~~and 2.2~~ shall not be displaced, but subject thereto the ~~foregoing~~ order of business may be varied:

(a) by the Chairman at his/her discretion; or

(b) by a resolution passed on a Motion (which need not be in writing) duly moved and seconded, which shall be moved and put without discussion.

2.3. Extraordinary Meetings

2.3.1 ~~Calling extraordinary meetings~~

Those listed below may request the ~~p~~Proper ~~o~~Officer to call Council meetings in addition to ~~o~~Ordinary ~~m~~Meetings:

(a) the Council by resolution;

(b) the Chairman of the Council;

(c) the Monitoring Officer; or

(d) any five Members of the Council if they have signed a requisition presented to the Chairman of the Council and he has refused to call a meeting or has failed to call a meeting within seven days of the presentation of the requisition.

2.3.2 ~~Business~~

The business to be conducted at an extraordinary meeting shall be restricted to the item of business contained in the request for the extraordinary meeting and there shall be no consideration of previous minutes or reports from Cabinet or ~~c~~Committees etc. except that the Chairman may at his absolute discretion permit other items of business to be conducted for the efficient discharge of the Council's business.

34. ~~Appointment of s~~Substitute ~~m~~Members

43.1 **Appointment**

Where a member is appointed to a Committee or any committee/sub-committee of another council on which the District Council is represented, the member may appoint a substitute member to attend the meeting subject to the following qualification requirements:

a) In the case of the Audit, Licensing, Planning, Regulatory and Standards committees, all substitute members must have received training on the relevant committee's area of work.

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b) Where the Member appointing a substitute is a Member of a Political Group the substitute Member shall only be from the membership of that same group unless there are no such trained members in that group.

~~Cabinet~~

~~This rule does not apply to the Cabinet as they are not able to use substitutes~~

~~4.2 Scrutiny Committee and Policy Development Groups (PDGs)~~

~~Where a member is appointed to the Scrutiny Committee, Policy Development Groups or to serve on any committee or sub-committee of another council on which this council is represented, provided that council's constitution so permits, that member may appoint a substitute member to attend the meeting~~

~~4.3 Planning, Licencing, Licensing Regulatory, Audit and Standards Committee~~

~~In respect of the Licensing, Licensing Regulatory, Audit and Standards Committees, each Committee will have a pool of five suitably trained members shall be established and substitutes may only be nominated from that pool. Planning Committee has a pool of 7).~~

~~4.4 Licencing, Licensing Regulatory and standards sub committees~~

~~Substitutes cannot be used in the case of a Licencing, Regulatory or Standards sub committee.~~

~~4.5~~

~~Where the Member appointing a substitute is a Member of a Political Group the substitute Member shall be from the membership of that same Group.~~

3.2 **Extent of the Substitution**

3.2.1Any such substitution shall have effect for the entirety of the meeting in respect of which the Notice has been given.

~~A substitute Member shall be entitled to vote and shall assume all the responsibilities and rights of a Member of the Scrutiny Committee, Audit Committee, Policy Development Group, Committee, Sub-Committee or other body.~~

~~Notice in writing of a substitute shall be given to the Chief Executive (and recorded by him in the order in which they are received) by the Member appointing the substitute before the commencement of the meeting. Notification by a Member purporting to be a substitute Member will not be accepted.~~

3.2.2. No more than two Members of the same Political Group shall be substituted at any meeting, and no Member shall be substituted at more than two consecutive meetings of the same ~~Scrutiny~~ Committee~~., Audit Committee, Policy Development Group, Committee, Sub-Committee etc.~~

~~The Monitoring Officer may consider a request from a Member of a Council Body to appoint a substitute Member (for one meeting only), providing that substitute Member is from the same political group.~~

~~In order to be eligible to sit as substitutes on regulatory or quasi-judicial committees or panels or staff appointments or disciplinary bodies~~

~~established by the Council, Members must have received formal training in relevant procedures and the law~~

~~Substitute Members will have all the powers and duties of any ordinary Member of the committee but will not be able to exercise any special powers or duties exercisable by the person they are substituting.~~

3.2.3 Substitute Members may only attend meetings in that capacity ~~only~~where:

~~(a) to take the place of the ordinary Member for whom they are designated substitute;~~

~~(b)~~(a) ~~where~~ the ordinary Member will be absent for the whole of the meeting;

~~(c)~~(b) ~~where~~ the ordinary Member has notified the Member Services ~~Officer~~ Manager by email of the intended substitution at least one hour before the start of the relevant meeting; and

~~(d)~~(c) ~~provided,~~ in the case of area committees~~, that~~ the substitution does not alter the balance on that committee between Members from the area and Members from the rest of the District.

~~5~~4. Time, Place and ~~Duration~~ Notice of Meetings

~~5~~4.1 The time and place of meetings will be determined by the Chief Executive and notified in the summons.

~~**6. Notice of and Summons to Meetings**~~

~~6.1~~4.2 The Chief Executive will give notice to the public of the time and place of any meeting in accordance with the Access to Information Procedure Rules.

4.3 At least five clear working days before a meeting, the Chief Executive approved will send a summons ~~signed~~ approved by him/her to every Member of the Council. The summons will give the date, time and place of each meeting and specify the business to be transacted, and will be accompanied by such reports as are available.

~~7~~5. Chairman of the Meeting

~~7~~5.1 The person presiding at the meeting may exercise any power or duty of the Chairman. ~~Where these rules apply to committee and sub-committee meetings, references to the Chairman also include the Chairmen of committees and sub-committees.~~

~~7~~5.2 The Chairman of the Council, by virtue of office, is not eligible to hold office as a Chairman of any other Committee during his/her term.

5.3 The ruling of the Chairman as to the construction or application of any of these Procedure Rules, or as to any proceedings of the Council, shall not be challenged at any meeting.

5.4 When the Chairman stands during a debate, any member speaking at the time must stop and sit down. The meeting must be silent.

~~8~~6. Quorum

~~8~~6.1 The quorum of a Full Council meeting will be one quarter of the whole number of Members (~~11 members~~rounded up) present at the meeting where physical presence is required (or in attendance including remotely where

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such physical presence is not required). ~~During any meeting if the Chairman counts the number of Members present and declares there is not a quorum present, then the meeting will adjourn immediately. Remaining business will be considered at a time and date fixed by the Chairman. If he/she does not fix a date, the remaining business will be considered at the next ordinary meeting.~~

~~8~~6.2 The quorum for a meeting of the Cabinet and any ~~, Scrutiny~~ Committees will be one half of the number of members appointed to that body (rounded up) subject to a minimum of three in each case. ~~, Audit Committee, Standards Committee, Policy Development Groups, Planning Committee, Licensing Committee, Licensing Regulatory Committee, a Committee or a sub-committee of the Council will be one half of the number of members appointed (rounded up) to the Cabinet (four), Scrutiny Committee (six), Audit Committee (four), Standards Committee (five), Policy Development Groups (five), Planning Committee (six), Licensing Committee (six), Licensing Regulatory Committee (six), a Committee or a sub-committee. See the procedure Rules for information about quorum per committee~~

6.3 During any meeting if the Chairman counts the number of Members present and declares there is not a quorum present the meeting will adjourn and remaining business will be considered at a time and date fixed by the Chairman or failing such, at the next ordinary meeting.

~~**9. Single Issue Debate**~~

~~9.1 Where any five members give notice in writing, delivered at least eight clear days before the next meeting of the Council at the office of the Chief Executive, of request for a single issue debate. Rule 16 (Rules of Debate) shall not apply to any debate under this Procedure Rule.~~

~~9.2 A period of not exceeding one hour shall be allowed during which debate may take place. Any recommendations arising from such debate shall be referred to the appropriate committee for consideration.~~

~~10~~7. Members' Business

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~~10~~7.1 At each ordinary meeting of the full Council, a period not exceeding 15 minutes shall be allowed during which any Member may make a statement or give preliminary verbal notice of a question provided that:-

(a) such statement or question must be relevant to some matter in relation to which the Council has powers or duties, or which affects the District and has not been otherwise before the Council for consideration at the same meeting;

(b) no Member may make more than one statement or give notice of more than one question;~~,~~

(c) ~~and~~ no Member shall speak pursuant to this Procedure Rule for longer than two minutes;

(d~~e~~) the statement or notice of question shall not be the subject of discussion or reply at that meeting;

(e) ~~(d)~~after the expiry of the said period of 15 minutes the Council shall proceed to the next business; and

(f) ~~.~~ such statement or questions is not (in the opinion of the Chairman) scurrilous, improper, capricious, irrelevant or otherwise objectionable.

~~11~~8. Questions ~~by~~ from the Public

~~11~~8.1 Residents, electors or business rate payers of the District shall be entitled to ask questions at a meeting provided that:

~~General~~

(a) ~~(a)~~the question(s) are relevant to an item on the Agenda for that meeting;~~Public Question Time shall apply at all public meetings of the Council with the exception of the Licencing Sub Committee, Licensing Regulatory Sub-committee and Standards Sub Committee.~~

(b) all the questions from one body shall not exceed three minutes when read out;

(c) written notice has been given to the Member Services Manager by noon plus one clear working day before the meeting (via email or otherwise as he/she agrees) of the question(s) to be asked; and

(d) the questions have not been rejected in accordance with Rule 8.5.

8.2 **Time for Public Questions**

~~(b)~~ Any ~~P~~public ~~Q~~question ~~Time~~ shall ~~normally~~ be dealt with at the beginning of the Agenda ~~(i.e. as part of the formal meeting) unless a Committee/Group shall determine otherwise;~~and

~~(c) The total time allocated for questions by the public is~~ limited to 30 minutes provided that the Chairman may extend the time, or proceed to the next agenda time within the shortened period if there are no questions or all permitted questions are answered. ~~In the event that there are no questions, or no further questions, the Chairman shall have the discretion to proceed with the Agenda prior to the expiry of that period. The Chairman also has discretion to extend the time for public questions if he/she deems it to be appropriate~~

~~(d) Residents, electors or business rate payers of the District shall be entitled to ask questions~~

~~11.2~~8.3 ~~Asking a question at the meeting~~**Attendance**

~~Ideally p~~Persons submitting questions ~~should~~ must be present (remotely or in person) at the meeting unless the Chairman agrees to address the questions in the questioner's absence. ~~It is preferable that notice is given of the question to be asked at the meeting~~

~~However, if a questioner who has submitted a question is unable to be present, they may ask the Chairman to put the question on their behalf.~~

8.4 **Order of Questions**

~~(a)~~ Questions will be asked in the order they have been received

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8.5 **Scope**

~~(b) Written questions will be dealt with first~~

~~(c) Questions may be verbal or, preferably written~~

~~(d) A question shall not exceed 3 minutes~~

~~(e) Questions must be relevant to an item on the Agenda for that meeting~~

~~(f)~~ The Chairman may, following advice from either the Chief Executive, Monitoring Officer or Member Services Manager, ~~shall have the discretion to~~ reject a question~~,~~ giving reasons for that rejection, if it:

(a) Is not about a matter for which the Council has a responsibility or which affects the District;

(b) Is in his/her opinion scurrilous, improper, capricious, irrelevant or otherwise objectionable;

(c) Is substantially the same as a question which has been put at a meeting to which these rules apply ~~of the Council~~ in the past six months; or

(d) ~~r~~Requires the disclosure of confidential or exempt information.

~~11.3~~8.6 **Supplementary question**

At the discretion of the Chairman ~~of that meeting,~~ questioners may ask one supplementary question.

~~11.4~~8.7 **Answers to questions**

8.7.1 The ~~c~~Chairman ~~of the meeting,~~ or at meetings of the Council the appropriate ~~c~~Committee chairman, shall respond to all valid questions.

8.7.2 Replies to questions may be verbal~~, or at the discretion of the Chairman,~~ in writing~~,~~ or by reference to a published document.

8.7.3 ~~Written R~~Replies which are not provided at the meeting shall be reported to the next relevant meeting ~~of the Committee and~~ by publishing~~ed~~ them alongside the draft minutes when available and by circulating them ~~. Responses will also be sent~~ to all ~~Councillors~~Members.

~~12~~9. Petitions from the Public to Full Council

~~12~~9.1 **Notice of Petition**

9.1.1 If a citizen wishes to present a petition to a Council meeting, notice must be given at least 10 working days before the meeting.

9.1.2 Petitions to be debated at the Council Meeting will have been selected according to the Petitions Scheme (which is attached as Appendix D to the Constitution).

~~12~~9.2 **Presentation of Petitions**

9.2.1 The petition organiser will be allowed 5 minutes to present the petition at the meeting.

9.2.2 Only one person may speak to present a petition.

9.2.3 The Council will ~~then~~ debate a single ~~the~~ petition for a maximum of 15 minutes (if the petition has 1500 signatures or more).

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9.2.4 The Council's response to the petition ~~will depend on what the petition asks for and how many people have signed it, but it~~ may include one or more of the following:

(a) taking the action requested in the petition;

(b) not taking the action requested in the petition;

(c) considering the petition at a council meeting;

(d) holding an inquiry into the matter;

(e) undertaking research into the matter;

(f) holding a public meeting;

(g) holding a consultation;

(h) holding a meeting with the petitioners;

(i) calling a referendum;

(j) referring the petition for consideration by other committees such as the Scrutiny Committee;

(k) where the issue is one on which the Cabinet is required to make the final decision, the Council will decide whether to make recommendations to inform that decision;

(l) the petition organiser will receive a written acknowledgement of receipt of their petition, details as to when and where their petition will be considered and a letter giving the outcome which will also be published on the Council website.

~~12.5~~9.3 **Scope of Petitions**

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9.3.1 The Member Services Manager may reject a petition if it:

(a) does not qualify under the scheme;

(b) does not ~~i.e. it does not~~ follow the Council's guidelines for submitting a petition;

(~~cb~~) it is vexatious, abusive or otherwise inappropriate;

(~~dc~~) it is a petition qualifying under another enactment;

(~~ed~~) it relates to a planning, licensing or other regulatory decision;

~~(e) it relates to a licensing decision;~~

(f) it relates to any other matter relating to an individual or entity in respect of which that individual or entity has a right of recourse to a review or right of appeal conferred by or under any enactment.

~~13~~10. Questions ~~by~~ from Members at full Council

~~13~~10.1 **Questions without notice ~~O~~on reports of the Cabinet ~~or~~ and C~~c~~ommittees**

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At an Ordinary meeting of the full Council~~, other than the Annual meeting,~~ a Member of the Council may ask the Leader, Cabinet Members or the Chairman of a ~~c~~Committee any question without notice upon an item of the report of the Cabinet or a ~~c~~Committee when that item is being received or under consideration by the Council.

10~~3~~.2 **Questions on notice at full Council~~.~~**

A Member of the Council may, ~~if by not later than noon, one clear working day preceding any ordinary meeting of the Council, notice in writing has been given to the Chief Executive,~~ ask the Chairman of the Council, ~~or~~ the Leader, ~~the~~ a Cabinet Member or the Chairman of any Committee any question ~~on any matter in relation to~~ which:

(a) concerns the Council's ~~have~~ powers ~~or /~~ duties or which otherwise affects the District;~~,~~

(b) relates to matters on which the Council has or may determine a policy;

(c) the Member has provided written notice of the question to the Chief Executive no later than noon, two clear days preceding the Council meeting;

(d) ~~that~~ the ~~subject matter of the particular~~ question ~~shall have~~has first been ~~the subject of~~ discuss~~ed~~~~ion~~ at a meeting of the Cabinet or ~~appropriate~~ Committee ~~or Sub-Committee~~ and ~~that, in~~ the ~~particular case the~~ Member ~~who seeks to ask the question~~ is not satisfied with the adequacy of the answer contained in the relevant Minutes; and ~~of the Cabinet or that Committee or Sub-Committee~~.

(e) ~~If any doubt arises as to whether the particular subject matter has been the subject of discussion at a meeting of the appropriate Committee or Sub-Committee this shall be determined by the Chairman of the Council whose decision in such regard shall not be open to challenge.~~the question is not (in the opinion of the Chairman taking account of the advice on the matter from the Chief Executive, Monitoring Officer or Member Services Manager) one which:

i) is scurrilous, improper, capricious, irrelevant or otherwise objectionable

ii) is substantially the same as a question which has been put at a meeting of the Council (or other meeting to which these rules apply) in the past six months;

iii) requires the disclosure of confidential or exempt information unless the question is raised in closed session;

iv) contains expressions of opinion; or

~~i)~~v) relates to questions of fact.

10~~3~~.3 **Questions relating to urgent business**

A Member of the Council may, with the advance permission of the Chairman, put to him, ~~or~~ the Leader, a Cabinet Member or the Chairman of any C~~c~~ommittee any question relating to urgent business of which notice has not been given in accordance with paragraph 10.2(c~~a~~) above, provided that:

(a) the Chairman in his absolute discretion is satisfied that the matter being raised ~~in such a question~~ is of such urgency ~~as to preclude the procedure in~~that compliance with paragraph 10.2(c~~a~~) is precluded nor should its ~~above being pursued and that he is also satisfied that it is not appropriate for the matter to await~~ consideration be delayed until the next meeting of the Cabinet or the Committee; and

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at the next meeting of the Cabinet or the appropriate Committee or Sub-Committee and

(b) provided also that a copy of any such question has been delivered to the Chief Executive no later than nine o'clock9am on the morning of the day before the Council Meeting.

10.4 **Order of Questions**

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10.4.1 Questions under paragraph 10.2 and 10.3 above shall be taken at the appropriate point in the relevant Committee report or in the absence of such, at the Members' Questions agenda item.

10.4.2 Questions and written answers shall be printed in order of receipt and circulated amongst the Members at the commencement of the Council Meeting. and

10.4.3 nNo discussion shall be allowed upon questions or answers save as is permitted under Rules 10.5 to 10.8 below.

13.5 Content of Questions

Questions under Rule 13.3 or 13.4 must, in the opinion of the Chairman:

(a) contain no expressions of opinion;

(b) relate to matters on which the Council has or may determine a policy;

(c) not relate to questions of fact.

If questions or supplementary questions are unsuitable in form, frivolous or derogatory to the dignity of the Council, the Chairman of the Council shall have the right to rule the matter void.

10.5 **Form of Response**

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10.5.1 The Chief Executive shall arrange for copies of questions and answers to be sent to Members not present at the Meeting of the Council.

10.5.2 An answer may take the form of:

(a) a direct oral answer at the meeting;

(b) where the desired information is in a publication of the Council or other published work, a reference to that publication; or

(c) where the reply cannot conveniently be given orally, a written answer circulated within 10 working days to the questioner and all Members.

1310.6 7 **Supplementary question**

One relevant supplementary question to an answer to a question on notice shall be allowed to the original questioner but may be disallowed or not answered if unless such supplementary question is disallowed by the Chairman of the Council considers it in breach of under paragraph 13.5 10.2(e)of this Rule.

103.78 **Length of Speeches**

A Member asking a question under Rules 13.310.1 or to 13.4 10.3 and a Member answering such a question may speak for no longer than 3 three minutes unless the Chairman consents to a longer period.

103.89 **Time Allowed for Questions** at Council Meetings

10.8.1 The time allowed for consideration of all questions at full council which are submitted under Rule 13 10 shall not, without the consent of the Council, exceed 30 minutes.

10.8.2 At the conclusion of the answer to the question under consideration at the expiry of 30 minutes (or such longer period to which the Council has consented) from the time when the first questioner started to speak, the Chairman shall continue with the meeting unless the Council resolves otherwise at the meeting.

10.8.3 Any remaining questions shall be responded to in writing before the next ordinary meeting of the Council with the written answers to be forwarded to all CouncillorsMembers.

114. Motions

11.1 Motions on Notice

114.1.1 **Notice:**

Except for motions which can be moved without notice under Rule 1511.7, written notice of every motion, must be delivered to the Chief Executive via Member Services at least 8 eight clear working days before the Council meeting at which it is to be considered.

11.1.2 **Record of Motions:** Motions received will be entered in a record, in the order they are received, which is open to public inspection. and wWhere a motion is rejected, the record need only comprise a summary they are rejected giving reason(s) why it was rejected.

14.211.1.3 **Motion set out in summons:**

The Chief Executive shall set out in the Summons for every meeting of the Council all Motions of which notice has been duly given in the order in which they have been received, unless:

(a)The motion is rejected in accordance with Rule 11.5; or

(b) Tthe Member giving such a notice intimated in writing, when giving it, that he/she proposed to move it at some later meeting, or has since withdrawn it in writing.

14.311.1.4 **Motion not moved:**

Subject to 11.1.7 Iif a Motion thus set out in the Summons be is not moved either by a Member who gave notice thereof or by some other Member on his

behalf it shall, unless postponed by ~~consent~~ resolution of the Council, be treated as withdrawn and shall not be moved without fresh notice.

11.1.5 **Speaking on the Motion:** Those moving and seconding the Motion at the Council meeting shall be invited to speak on the Motion. In the event that the Motion stands referred to another body as provided for in 11.1.6 the mover (or in his absence, the seconder) of the Motion shall be invited to the relevant meeting to amplify the Motion, but without any right to vote except as a member of the Cabinet or relevant Committee.

~~14.4~~11.1.6 ~~Automatic~~ **Reference to Committee:**

If the subject matter of any Motion, of which notice has been duly given comes within the province of the Cabinet~~,~~ or a Committee ~~or Policy Development Group~~, it shall, ~~upon~~ after being formally moved and seconded (with those moving and seconding the motion having been given the opportunity ~~being invited~~ to speak ~~at this point~~on the Motion), either:

(a) ~~-~~stand referred to the Cabinet or the most relevant~~,~~ Committee ~~or Policy Development Group~~ as the Chairman may determine for consideration and report; or

~~(a)~~(b) ~~unless~~ on an alternative ~~proposition~~ motion ~~is~~ being put forward and ~~is~~ accepted, be dealt within in accordance with that alternative motion.~~; and that the mover (or in his absence, the seconder) of the Motion should be invited to the meeting of the Cabinet, Committee or Policy Development Group to amplify the Motion, but without any right to vote except as a member of such Committee. Provided that the Chairman may if he considers it convenient and conducive to the despatch of business allow the Motion to be dealt with at the meeting, at which it is brought forward.~~

11.1.7 **Consideration by full Council:** The Chairman of Council may if he considers it convenient and conducive to the despatch of business allow the Motion to be dealt with at the meeting, at which it is brought forward.

~~14.5~~11.1.8 **Scope of Motions on Notice:**

Motions must:

(a) be about matters for which the Council has a responsibility or which affect the District; and

(b) not, in the opinion of the Chief Executive be out of order, illegal, irregular or improper.

11.1.9 If ~~notice is given of any original motion that, in the opinion of the proper officer is out of order, illegal, irregular or improper~~a motion is not within scope, the Chief Executive shall as soon as is practicable, ~~then the proper officer shall immediately~~ submit ~~such~~ the notice of motion to the Chairman of the Council and ~~it~~ the motion

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shall not be accepted ~~and~~ nor placed on the agenda without ~~his~~ the Chairman's sanction.

11.1.10 In the event of non-acceptance, the ~~proper officer~~Chief Executive shall inform the member giving notice as soon as reasonably possible ~~and stating~~of the reason(s) for the rejection.

~~14.6~~11.2 **Motion on Notice to R~~r~~emove the Leader**

In order for such a motion to be carried it must have the support of the majority of those members voting and present in the room at the time the question was put.

~~15~~11.3. Motions without Notice

1~~15~~.3.1 The following motions may be moved without notice:

(a) to appoint a Chairman of the meeting at which the motion is moved;

(b) in relation to the accuracy of the minutes;

(c) to change the order of business in the agenda;

(d) to adopt a recommendation on some other course of action arising from a report to the meeting or as a result of a petition submitted to the meeting or recommendation arising from single issue debate

(e) to refer something to an appropriate body or individual;

(f) to appoint a committee or member arising from an item on the summons for the meeting;

(g) to receive reports or adoption of recommendations of ~~c~~Committees or officers and any resolutions following from them;

(h) to withdraw a motion which may be moved in accordance with this procedure rule;

(i) to amend a motion which may be moved in accordance with this procedure rule, subject to the provisions of the Budget and Policy Framework Procedure Rules in relation to amendment of the Cabinet's proposals for the Council's Budget and Policy Framework;

(j) to proceed to the next business (such Motion may only be moved by a Councillor who has not spoken in the debate)

(k) that the question be now put (such Motion may only be moved by a Councillor who has not spoken in the debate)

(l) to adjourn a debate;

(m) to adjourn a meeting;

(n) to suspend a particular Council Procedure Rule;

(o) to exclude the public and press in accordance with the Access to Information Procedure Rules;

(p) Not to hear further a Member named under Rule ~~23.3~~18.2 or excluded from the meeting under Rule ~~23.4~~18.3; and

(q) to give the consent of the Council where its consent is required by this Constitution.

16~~2~~. Rules of Debate

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12.1 No speeches may be made unless the appropriate Notice has been given and until the Motion is seconded; or the appropriate Notice has been given and is moved by the Chairman of the meeting.

~~A Motion or Amendment shall not be discussed unless it has been proposed and seconded, and unless the appropriate Notice has been given:~~

~~(a) in the case of a Motion, in accordance with Rule 14; or~~

~~(b) in the case of an Amendment (other than an Amendment moved in accordance with Rule 15), notice in writing of the Amendment shall have been delivered to the office of the Chief Executive of the District Council by no later than 9.30am on the day before the day of the meeting and a copy of it shall be circulated to each Member of the District Council by the Chief Executive at the commencement of the meeting at which it is to be discussed.~~

~~Except that where the Chairman is satisfied that, in the context of the debate which has taken place, a further Amendment becomes necessary, he may at his discretion allow such further Amendment to be moved at the meeting. Any such further Amendment shall be put in writing and handed to the Chairman before it is discussed or put to the meeting.~~

12.2~~16.1~~ ~~Seconder's speech~~

When seconding a motion or amendment, a member may reserve their speech until later in the debate.

~~16.2~~12.3 **Content and length of speeches**

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12.3.1 Speeches must be directed to the question under discussion or to a personal explanation or point of order.

12.3.2 No speech shall exceed:

(a) Five minutes in the case of the mover of a Motion;

(b) Three minutes in the case of the seconder;

(c) Five minutes in the case of the Leader, the relevant Cabinet Member or the Chairman of a Committee dealing with the matters arising from committee reports except with the consent of the Chairman who shall have discretion to extend that time if it appears prudent in his judgement to do so;

(d) Three minutes in all other cases except by consent of the Council; and~~.~~

(e) When the Council's annual budget is under discussion, the leader of each political group on the Council may speak for up to five minutes or such longer period as the Chairman shall allow.

~~16.3~~12.4 **When a Member may speak again**

A member who has spoken on a motion may not speak again whilst it is the subject of debate, except:

(a) to speak once on an amendment moved by another member;

(b) to move a further amendment if the motion has been amended since he/she last spoke;

(c) if his/her first speech was on an amendment moved by another member, to speak on the main issue (whether or not the amendment on which he/she spoke was carried);

(d) in exercise of a right of reply;

(e) on a point of order; and

(f) by way of personal explanation.

~~16.4~~12.5 **Amendments to motions**

An amendment to a motion must be relevant to the motion and will either be:

(a) to refer the matter to an appropriate body or individual for consideration or reconsideration;

i. to leave out words;

ii. to leave out words and insert or add others; or

iii. to insert or add words

iv. as long as the effect of i)~~1~~ to ~~3~~iii) is not to negate the motion.

(b) Only one amendment may be moved and discussed at any one time. No further amendment may be moved until the amendment under discussion has been disposed of provided that the Chairman may permit two or more ~~A~~amendments to be discussed (but not voted on) together if circumstances suggest that this course of action would facilitate the proper conduct of the Council's business.

(c) If an amendment is not carried, other amendments to the original motion may be moved.

(d) If an amendment is carried, the motion as amended takes the place of the original motion. This becomes the substantive motion to which any further amendments are moved.

(e) After an amendment has been carried, the Chairman will read out the amended motion before accepting any further amendments, or if there are none, put it to the vote.

~~16.5~~12.6 **Alteration of motion**

12.6.1A Member may alter a motion of which he/she has given notice with the consent of the meeting. The meeting's consent will be signified without discussion.

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12.6.2 A Member may alter a motion which he/she has moved without notice with the consent of both the meeting and the seconder. The meeting's consent will be signified without discussion.

12.6.3 Only alterations which could be made as an amendment may be made.

~~16.6~~12.7 **Withdrawal of motion**

12.7.1 A Member may withdraw a motion which he/she has moved with the consent of both the meeting and the seconder.

12.7.2 The meeting's consent will be signified without discussion.

12.7.3 No member may speak on the motion after the mover has asked permission to withdraw it unless permission is refused.

~~16.7~~12.8 **Right of reply**

12.8.1 The mover of a motion has a right to reply at the end of the debate on the motion, immediately before it is put to the vote.

12.8.2 If an amendment is moved, the mover of the original motion has the right of reply at the close of the debate on the amendment, but may not otherwise speak on it.

12.8.3 The mover of the amendment has no right of reply to the debate on his/her amendment.

~~16.8~~12.9 **Motions which may be moved during debate**

When a motion is under debate, no other motion may be moved except the following procedural motions:

(a) to withdraw a motion;

(b) to amend a motion;

(c) to proceed to the next business;

(d) that the question be now put;

(e) to adjourn a debate;

(f) to adjourn a meeting;

(g) to exclude the public and press in accordance with the Access to Information Procedure Rules; and

(h) Not to hear further a Member named under Rule ~~23.3~~18.2 or excluded from the meeting under Rule ~~23.4~~18.3.

~~16.9~~12.10 **Closure motions**

12.10.1 A Member may move, without comment, the following motions at the end of a speech of another Member;

(a) to proceed to the next business;

(b) that the question be now put;

(c) to adjourn a debate; or

(d) to adjourn a meeting.

12.10.2 If a motion to proceed to next business is seconded and the Chairman ~~thinks~~ considers the item has been sufficiently discussed, he/she will give the mover of the original motion (if there is one) a right of reply and then put the procedural motion to the vote.

12.10.3 If a motion that the question be now put is seconded and the Chairman ~~thinks~~ considers the item has been sufficiently discussed, he/she will put the procedural motion to the vote. If it is passed he/she will give the

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mover of the original motion (if there is one) a right of reply before putting his/her motion to the vote.

12.10.4 If a motion to adjourn the debate or to adjourn the meeting is seconded and the Chairman ~~thinks~~ considers the item has not been sufficiently discussed and cannot reasonably be so discussed on that occasion, he/she will put the procedural motion to the vote without giving the mover of the original motion the right of reply.

~~16.10~~12.11 **Point of order**

A point of order is a request from a member to the Chairman to rule on an alleged irregularity in the procedure of the meeting. A member may raise a point of order at any time. The Chairman will hear them immediately. A point of order may only relate to an alleged breach of procedure set out in these Council Rules of Procedure or the law. The member must indicate the rule or law and the way in which he/she considers it has been broken. The ruling of the Chairman on the matter will be final.

~~16.11~~12.12 **Personal explanation**

A member may make a personal explanation at any time. A personal explanation may only relate to some material part of an earlier speech by the member which may appear to have been misunderstood in the present debate. The ruling of the Chairman on the admissibility of a personal explanation will be final.

~~17~~13. State of the District Debate

~~17~~13.1 Calling of the debate

The Leader may call a state of the District debate annually on a date to be agreed with the Chairman.

~~17~~13.2 Form of the debate

The Leader will decide the form of the debate with the aim of enabling the widest possible public involvement and publicity. This may include holding workshops and other events prior to or during the state of the District debate.

~~17~~13.3 Chairing of the debate

The debate will be chaired by the Chairman.

~~17~~13.4 Results of the debate

13.4.1 The results of the debate will be:

(a) disseminated as widely as possible within the community and to agencies and organisations in the area; and

(b) considered by the Leader in proposing the Budget and Policy Framework to the Council for the coming year.

13.4.2 If the Leader fails to call a debate within nine months in any municipal year, it may be called by notice in writing to the Chief Executive signed by any 10 Members of the Council and that the debate shall be heard on the subject and form specified by those 10 Members.

~~18~~14. Previous Decisions and Motions

~~18~~14.1 Motion to rescind a previous decision

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A motion or amendment to rescind a decision made at a meeting of Council within the past six months cannot be moved unless the notice of motion is signed by at least 10 Members.

~~18~~14.2 **Motion similar to one previously rejected**

14.2.1 This Procedure Rule 14.2 shall not apply to Motions moved in pursuance of a recommendation of a Committee.

14.2.2 A motion or amendment in similar terms to one that has been rejected at a meeting of Council in the past six months cannot be moved unless the notice of motion or amendment is signed by at least ten members.

14.2.3 Once the motion or amendment is dealt with, no one can propose a similar motion or amendment for six months.

~~Provided that the Procedure Rule shall not apply to Motions moved in pursuance of a recommendation of a Committee.~~

~~19~~15. **Voting**

~~19~~15.1 **Majority**

Unless this Constitution provides otherwise, any matter will be decided by a simple majority of those members voting and present in the room at the time the question is put.

~~19~~15.2 **Chairman's casting vote**

If there are equal numbers of votes for and against, the Chairman will have a second or casting vote. There will be no restriction on how the Chairman chooses to exercise a casting vote.

~~19~~15.3 **Method of Voting**

Unless a recorded vote is demanded under Rule ~~19~~15.4 the Chairman will take the vote by show of hands, or if there is no dissent, by the affirmation of the meeting.

~~19~~15.4 **Recorded vote**

If ~~ten~~ 10 members present at the meeting demand it, the names for and against the motion or amendment or abstaining from voting will be taken down in writing and entered into the minutes.

~~19~~15.5 **Right to require individual vote to be recorded**

Where any member requests it immediately after the vote is taken, their vote will be recorded in the minutes to show whether they voted for or against the motion or abstained from voting.

~~19~~15.6 **Voting on appointments**

15.6.1 If there are more than two people nominated for any position to be filled and there is not a clear majority of votes in favour of one person, then the name of the person with the least number of votes will be taken off the list and a new vote taken.

15.6.2 The process will continue until there is a majority of votes for one person.

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~~19~~15.7 **Voting on the Budget and Council Tax**

At a Budget meeting, the vote on any motion or amendment relating to the setting of the Budget (revenue and capital budget) and Council Tax or precept shall be by roll call and the names of Members who voted as for, against or in abstention to any such motion or amendment shall be recorded in the minutes of that meeting.

~~20~~16. Minutes

~~20~~16.1 **Signing the minutes**

16.1.1 The Chairman will sign the minutes of the proceedings at the next suitable meeting.

16.1.2 The Chairman will move that the minutes of the previous meeting be signed as a correct record.

16.1.3 The only part of the minutes that can be discussed is their accuracy.

16.2 **No requirement to sign minutes of previous meeting at an E~~e~~xtra-~~ordinary meeting~~**

Where in relation to any meeting, the next meeting for the purpose of signing the minutes is a meeting called under paragraph 3 of Schedule 12 to the Local Government Act 1972 (an extraordinary meeting), then the next following meeting (being a meeting called otherwise than under that paragraph) will be treated as a suitable meeting for the purposes of paragraph 41(1) and (2) of Schedule 12 relating to signing of minutes.

~~20.2~~16.3 **Form of minutes**

Minutes will contain all motions and amendments in the exact form and order the Chairman put them.

~~**21. Record of Attendance**~~

~~Every member of the Council attending a meeting of the Council, the Cabinet, Scrutiny Committee, Audit Committee, Policy Development Groups, Committees and Sub-Committees of which he/she is a member, shall sign his/her name in the attendance book or sheet provided for that purpose.~~

~~All members present during the whole or part of a meeting must sign their names on the attendance book or sheets before the conclusion of every meeting to assist with the record of attendance.~~

~~22~~17. Exclusion of Public

Members of the public and press may only be excluded either in accordance with the Access to Information Procedure Rules in Part 4 of this Constitution or Rule ~~24~~ 19 (Disturbance by Public) or otherwise permissible in law.

~~23~~18. Members' Conduct

~~23~~18.1 **Speaking at meetings**

18.1.1 When a Member speaks at full Council he/she must address the meeting through the Chairman.

18.1.2 If more than one member signifies their intention to speak, the Chairman will ask one to speak.

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18.1.3 Other Members must remain silent whilst a Member is speaking unless they wish to make a point of order or a point of personal explanation.

~~23.2 Chairman speaking~~

~~When the Chairman stands during a debate, any member speaking at the time must stop and sit down. The meeting must be silent.~~

~~23.3~~18.2 **Member not to be heard further**

18.2.1 If a Member persistently disregards the ruling of the Chairman by behaving improperly or offensively or deliberately obstructs business, the Chairman may move that the member not be heard further.

18.2.2 If seconded, the motion will be voted on without discussion.

~~23.4~~18.3 **Member to leave the meeting**

18.3.1 If the Member continues to behave improperly after such a motion is carried, the Chairman may move that either the Member leaves the meeting or that the meeting is adjourned for a specified period.

18.3.2 If seconded, the motion will be voted on without discussion.

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~~23.5~~18.4 **General disturbance**

If there is a general disturbance making orderly business impossible, the Chairman may adjourn the meeting for as long as he/she thinks necessary.

~~24~~19. Disturbance by the Public

~~24~~19.1 **Removal of member of the public**

19.1.1 If a member of the public interrupts proceedings, the Chairman will warn the person concerned.

19.1.2. If they continue to interrupt, the Chairman will order their removal from the meeting room.

~~24~~19.2 **Clearance of part of meeting room**

If there is a general disturbance in any part of the meeting room open to the public, the Chairman may call for that part to be cleared.

~~25~~20. Suspension and Amendment of Council Procedure Rules

~~25~~20.1 **Suspension**

All of these Council Rules of Procedure except Rules ~~19.5~~5.3, ~~20.2~~15.5, ~~and 27~~ 16.3 may be suspended by motion on notice or without notice if at least one half of the whole number of members of the Council are present. Suspension can only be for the duration of the meeting.

~~25~~20.2 **Amendment**

Any motion to add to, vary or revoke these Council Rules of Procedure will, when proposed and seconded, stand adjourned without discussion to the next ordinary meeting of the Council unless the amendment is the subject of a report from the Standards Committee.

~~**26. Application to Committees and Sub-Committees**~~

~~All of the Council Rules of Procedure apply to meetings of full Council.~~

~~The Rules which apply to meetings of the Cabinet (except Rule 4), Committees and Sub-Committees are as follows:~~

~~(a) Rule 4 – Appointment of substitute members~~

~~(b) Rule 5 – Time and Place of Meetings~~

~~(c) Rule 6 – Notice and Summons to Meeting~~

~~(d) Rule 7 – Chairing of the Meeting~~

~~(e) Rule 8 – Quorum~~

~~(f) Rule 11 – Public Question Time~~

~~(g) Rule 16 – Rules of Debate~~

~~(h) Rule 19 – Voting (with the exception of 19.4 and 19.6)~~

~~(i) Rule 20.1 – Signing the Minutes~~

~~(j) Rule 21 – Record of Attendance~~

~~(k) Rule 22 – Exclusion of Public~~

~~(l) Rule 23 – Members Conduct~~

~~(m) Rule 24 – Disturbance by Public~~

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~~(n) Rule 25 – Suspension of Procedure Rule~~

~~In applying Rule 16 to meetings of the Cabinet, Committees and Sub-Committees, Rules 16.4, (content and length of speeches) and 16.5 (when a member may speak again) shall not apply.~~

~~**27. Interpretation of Procedure Rules**~~

~~The ruling of the Chairman as to the construction or application of any of these Procedure Rules, or as to any proceedings of the Council, shall not be challenged at any meeting of the Council.~~