

# Public Document Pack

Mid Devon District Council

## Community Policy Development Group

Tuesday, 16 November 2021 at 2.15 pm  
Council Chambers, Phoenix House, Tiverton

Next ordinary meeting  
Monday, 20 December 2021 at 2.15 pm

**PLEASE NOTE:** - this meeting will take place at Phoenix House and members of the Public and Press are encouraged to attend via Zoom wherever possible. The attached Protocol for Hybrid Meetings explains how this will work. Please do not attend Phoenix House without contacting the committee clerk in advance, in order that numbers of people can be appropriately managed in physical meeting rooms.

Join Zoom Meeting

<https://zoom.us/j/96660103307?pwd=Q05QbWlVNCs3WmVscU5LMmdiWkZxQT09>

Meeting ID: 966 6010 3307

Passcode: 217719

One tap mobile

08002605801,,96660103307#,,,,\*217719# United Kingdom Toll-free

08003582817,,96660103307#,,,,\*217719# United Kingdom Toll-free

Dial by your location

0 800 260 5801 United Kingdom Toll-free

0 800 358 2817 United Kingdom Toll-free

0 800 031 5717 United Kingdom Toll-free

Meeting ID: 966 6010 3307

Passcode: 217719

## Membership

Cllr Mrs E M Andrews

Cllr Mrs C Collis

Cllr W Burke

Cllr L J Cruwys

Cllr J M Downes

Cllr B Holdman

Cllr S Pugh

Cllr Mrs E J Slade

Cllr Mrs M E Squires

# AGENDA

*Members are reminded of the need to make declarations of interest prior to any discussion which may take place*

- 1      **Apologies and Substitute Members**  
To receive any apologies for absence and notices of appointment of substitute Members (if any).
- 2      **Declarations of Interest under the Code of Conduct**  
Councillors are reminded of the requirement to declare any interest, including the type of interest, and reason for that interest, either at this stage of the meeting or as soon as they become aware of that interest.
- 3      **Minutes of the Previous Meeting** (*Pages 5 - 8*)  
Members to consider whether to approve the Minutes of the last meeting as a correct record.
- 4      **Public Question Time**  
To receive any questions relating to items on the Agenda from members of the public and replies thereto.  
Note: A maximum of 30 minutes is allowed for this item.
- 5      **Chairmans Announcements**  
To receive any announcements that the Chairman may wish to make.
- 6      **Customer Care Policy** (*Pages 9 - 24*)  
To receive the 3 yearly review of the Customer Care Policy
- 7      **Air Quality Action Plan** (*Pages 25 - 106*)  
To provide Members of the Policy Development Group (PDG) with an opportunity to review and recommend adoption of the revised corporate Air Quality Action Plan (Annex 1) following the recent completion of external and public consultation. Details of the consultation are set out within the report. The consultation responses and outcomes are set out in Annex 2.  
  
The report also provides Members of the PDG with an update on progress with the development of a revised Air Quality Supplementary Planning Document (SPD) together with details and timeline to secure the legal adoption of the document. This is important to the delivery of aspects of the updated Air Quality Action Plan (AQAP), notably in relation to managing the impact of new development and securing planning obligations.
- 8      **Recommendations from Community Safety Partnership Working Group** (*Pages 107 - 112*)  
To receive the recommendations from the Community Safety Partnership Working Group.

9 **Medium Term Financial Plan - General Fund (GF), Housing Revenue Account (HRA) and Capital Programme** (Pages 113 - 132)

To consider the updated Medium Term Financial Plan (MTFP) which covers the period 2022/2023 to 2026/2027 and options available in order for the Council to set a balanced budget.

10 **Access to information - Exclusion of Press and Public**

During discussion of the next item it may be necessary to pass the following resolution to exclude the press and public having reflected on Article 12 12.02(d) (a presumption in favour of openness) of the Constitution. This decision may be required because consideration of this matter in public may disclose information falling within one of the descriptions of exempt information in Schedule 12A to the Local Government Act 1972. The Community Policy Development Group will need to decide whether, in all the circumstances of the case, the public interest in maintaining the exemption, outweighs the public interest in disclosing the information.

To consider passing the following resolution so that exempt information may be discussed.

**Recommended** that under Section 100A(4) of the Local Government Act 1972 the public be excluded from the next item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 respectively of Part 1 of Schedule 12A of the Act, namely information relating to the financial or business affairs of any particular person (including the authority holding that information).

11 **Leisure Pricing Review - 2022-2023** (Pages 133 - 162)

To receive details of the Leisure Pricing Review for 2022-2023

12 **Work Plan** (Pages 163 - 168)

To receive the current work plan for the Community PDG.

Members to agree and discuss additional items that they would like added to the work plan.

A proposal form for Members to discuss and agree whether they would like Officers to develop a vulnerability policy, which will be brought back to the PDG for approval at a later date

**Stephen Walford**  
Chief Executive  
Monday, 8 November 2021

## Covid-19 and meetings

From 7 May 2021, the law requires all councils to hold formal meetings in person. However, the Council is also required to follow government guidance about safety during the pandemic. The Council will enable all people to continue to participate in meetings via Zoom.

You are strongly encouraged to participate via Zoom to keep everyone safe - there is limited capacity in meeting rooms if safety requirements are to be met. There are restrictions and conditions which apply to those in the building and the use of the building. You must not attend a meeting at Phoenix House without complying with the requirements in the new protocol for meetings. You must follow any directions you are given.

Please read the new meeting protocol which is available here: <https://democracy.middevon.gov.uk/documents/s23135/MeetingProtocolUpdateOct2021nextreviewFeb2022.pdf>

If you want to ask a question or speak, email your full name to [Committee@middevon.gov.uk](mailto:Committee@middevon.gov.uk) by no later than 4pm on the day before the meeting. This will ensure that your name is on the list to speak and will help us ensure that you are not missed – as you can imagine, it is easier to see and manage public speaking when everyone is physically present in the same room. Notification in this way will ensure the meeting runs as smoothly as possible.

If you would like a copy of the Agenda in another format (for example in large print) please contact Carole Oliphant on:

E-Mail: [coliphant@middevon.gov.uk](mailto:coliphant@middevon.gov.uk)

Public Wi-Fi is available in all meeting rooms.

1.

## MID DEVON DISTRICT COUNCIL

**MINUTES** of a **MEETING** of the **COMMUNITY POLICY DEVELOPMENT GROUP**  
held on 21 September 2021 at 2.15 pm

### **Present Councillors**

W Burke, Mrs C Collis, L J Cruwys,  
B Holdman, S Pugh, Mrs E J Slade and  
D R Coren

**Apologies  
Councillor(s)** Mrs M E Squires and J M Downes

**Also Present  
Councillor(s)** D J Knowles and B G J Warren

**Also Present  
Officer(s):** Andrew Jarrett (Deputy Chief Executive (S151)), John Bodley-Scott (Economic Development Team Leader), Clare Robathan (Policy and Research Officer) and Carole Oliphant (Member Services Officer)

### 15 **APOLOGIES AND SUBSTITUTE MEMBERS (0.03.31)**

Apologies were received from Cllrs J M Downes and Mrs M E Squires who was substituted by Cllr D R Coren. The Vice Chairman was in the Chair.

### 16 **HYBRID MEETINGS PROTOCOL (0.03.52)**

The Group had before it, and **NOTED**, the \*Hybrid Meetings Protocol.

Note: \*Protocol previously circulated and attached to the minutes

### 17 **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (0.04.04)**

Members were reminded of the need to declare interests where appropriate.

### 18 **MINUTES OF THE PREVIOUS MEETING (0.04.22)**

The Minutes of the Meeting held on 27<sup>th</sup> July 2021 were approved as a correct record and **SIGNED** by the Chairman.

### 19 **PUBLIC QUESTION TIME (0.05.04)**

There were no members of the public present.

### 20 **CHAIRMAN'S ANNOUNCEMENTS (0.05.21)**

The Chairman had no announcements to make.

## 21 **STRATEGIC GRANTS REVIEW (0.05.51)**

The Group had before it a \*report from the Strategic Manager Growth, Economy and Delivery presenting the process for a review of strategic grant funding for the financial year 2022-2023.

The Economic Development Team Leader outlined the contents of the report and explained that the framework for the strategic grants review had been postponed due to the pandemic.

The officer explained that the intention for the 2022-2023 awards would be to invite written submissions and presentations from strategic partners to be presented to a working group of the PDG so that recommendations could be made on priorities and funding levels.

He explained that in view of the continuing pressure on local government finances, which was likely to require an 8-10% reduction in funding the PDG was recommended to seek clarification from the Cabinet on funding levels for strategic grants.

Consideration was given to:

- Members views that funding to strategic partners should not be reduced
- How new organisations could apply for funding as a strategic partner

It was therefore **RESOLVED** that:

- A working group be formed to look at the Council's funding priorities for the period 2022-2023 – The membership of the working group was agreed as Cllrs W Burke, L J Cruwys, B Holdman and Mrs M E Squires
- The PDG ask the Cabinet to set the level of strategic grants funding as part of the budget setting process

(Proposed by the Chairman)

**Reason for the decision:** To agree the process for a review of the strategic grant funding for the financial year 2022-2023

Note: \*report previously circulated and attached to the minutes

## 22 **CONSULTATION - DCC DOMESTIC ABUSE SUPPORT SAFE ACCOMMODATION STRATEGY (0.17.28)**

The Group had before it, and **NOTED**, the \*Devon County Council (DCC) Strategy for Domestic Abuse in Safe Accommodation presented by the Cabinet Member for Community Wellbeing.

The Cabinet Member explained that there was a need for DCC to formally consult on the Strategy and that they had a legal duty to finalise and publish the Strategy by the end of October 2021. He confirmed that the deadline for comments on the Strategy by Members was required by Friday 24<sup>th</sup> September.

He explained that there had been a 110% increase in case referrals during the pandemic and that services were seeing increased trauma and the number of children affected by domestic violence.

In response to questions asked, the Cabinet Member explained that the Strategy was applicable to all genders and all ages of anyone affected by domestic abuse.

It was **AGREED** that if any Members wanted to make any comments on the Strategy before the deadline of 24<sup>th</sup> September 2021 they would be forwarded to the Committee Clerk who would collate the responses and ensure that these were submitted.

Note: \*Strategy previously circulated and attached to the minutes

### 23 **ANTI SOCIAL BEHAVIOUR PROPOSAL FOR WORK PLAN (0.25.29)**

The Group had before it a \*proposal form submitted by Cllr S Pugh detailing a proposal that the Community PDG form a working group to investigate the Council's response to anti-social behaviour in the District.

The Scrutiny Officer explained that the proposal had also been discussed at a recent Programming Panel and that the Chairman of the Homes PDG had requested that their Members also be involved and offered the opportunity to join the working group. She explained that the Scrutiny Committee would be investigating community policing with police representatives.

Cllr Pugh outlined his proposal and stated that anti-social behaviour was not just an issue in Mid Devon but was wide reaching. He wanted to investigate if the Council's current policies were targeted and effective and the enforcement of these policies.

He explained that although the Council's website signposted people to the various organisations and departments who deal with anti-social behaviour it was not clear where people should report instances.

He wanted to explore projects which linked into local primary schools to educate young people of the effect of anti-social behaviour.

Consideration was given to

- Members views that the current CCTV offering in Tiverton was not felt to be adequate
- The re-opening of Tiverton Police station in the autumn

It was therefore **RESOLVED** that Anti-Social Behaviour was added to the work programme and:

- A working group be formed which consisted of Cllrs W Burke, B Holdman, S Pugh and Mrs M E Squires
- Members of the Homes PDG would be invited to join the working group

(Proposed by Cllr S Pugh and seconded by Cllr W Burke)

**Reason for the decision:** Anti-social behaviour was a major issue nationally and a key concern for residents.

Note: \*proposal form previously circulated and attached to the minutes

24 **WORK PLAN (0.46.16)**

The Group had before it, and **NOTED**, the \*Workplan which outlined the work of the PDG for the remainder of the municipal year.

The following items were raised as possible inclusion on the Workplan and it was **AGREED** that a proposal form would be completed and presented to the PDG at the next meeting:

- Vulnerability Protocol – Cllr B Holdman

The Scrutiny Officer informed the Group that the Scrutiny Committee were having representatives from Devon County Council present at their November meeting to give an update on Broadband within the District and that Members could either attend the meeting or submit written questions in advance.

Note: \*Workplan previously circulated and attached to the minutes

(The meeting ended at 3.07 pm)

**CHAIRMAN**



**COMMUNITY WELLBEING PDG  
16 NOVEMBER 2021  
REVIEW OF CUSTOMER CARE POLICY**

**Cabinet Member(s):** Councillor Nikki Woollatt, Working Environment Portfolio  
**Responsible Officer:** Lisa Lewis, Corporate Manager for Digital Transformation and Customer Engagement

**Reason for Report:** Review of the Customer Care Policy

**Recommendation:** To recommend to the Cabinet the content of the reviewed Customer Care Policy and Standards

**Financial Implications:** None

**Budget and Policy Framework:** None

**Legal Implications:** To ensure that all staff are aware of data protection requirements, along with their duties under the Equality Act 2010.

**Risk Assessment:** None

**Equality Impact Assessment:** To be completed in conjunction with Channel Access Strategy.

**Relationship to Corporate Plan:** The policy underpins the core values of Mid Devon District Council as stated in the Corporate Plan around People, Performance, Pride and Partnership.

**Impact on Climate Change:** None

## **1.0 Introduction/Background**

**1.1** The Customer Care Policy was last reviewed in August 2018. The key requirements for providing a good customer service remain unchanged; however the policy has been amended to ensure ease of understanding and a separate document created to establish expected Standards of Customer Service across the council (Appendix A).

**1.2** The provision of good customer service is important for every employee of Mid Devon District Council to understand. It is not service specific and applies across all services and posts.

**1.3** This policy and associated standards sets out the level of customer service that customers can expect from us when using the contact method of their choice.

**1.4** Appendix A shows the proposed standards, but not the final document design. This will be created on adoption of the agreed policy/standards.

## **2.0 Customer Service and Continuous Improvement**

**2.1** Work has commenced over the last twelve months in response to a Customer Experience Working Group and subsequent set of recommendations. These recommendations now form a Customer Service Improvement Plan as reported to Scrutiny in April 2021, with a subsequent update to the same committee in October 2021.

**2.2** The portfolio holders for Working Environment and Continuous Improvement have been involved in the initial review of that Policy and discussions around the creation of the Standards attached at Appendix A, as well as work in implementing the Customer Service improvement plan.

**2.3** On approval of the Policy and Standards, work will commence on the planning and delivery of Customer Service training and awareness to all staff and members to ensure we are appropriately skilled and have a common understanding of what good Customer Service looks like.

**2.4** As part of Customer Service improvement plans we will also be working with the portfolio holders for Working Environment and Continuous Improvement toward the creation of a Vulnerable Customer Policy. We will also review our activities in each service to ensure that we are able to meet the needs of these customers.

## **3.0 Customer Care Policy**

**3.1** Our Customer Care Standards will be available in our reception area at Phoenix House and published on our Website. The standards will set out what customers can expect from us.

**Contact for more Information:** Lisa Lewis, Group Manager for Business Transformation and Customer Engagement, Tel. 01884 234981, email: [llewis@middevon.gov.uk](mailto:llewis@middevon.gov.uk)

**Circulation of the Report:** Councillors Nikki Woollatt, Portfolio Holder Working Environment, Corporate and Operational Managers, Leadership Team

**List of Background Papers:** Customer Care Policy 2021 V4

# Customer Care Standards



# Introduction

## Our Vision

An organisation that provides consistently high quality customer services, which add value to the customer and to the Council

## Strategy

The standard of service a customer receives when they contact the Council will influence their view of the Council and potentially the area it serves. At a time when customer expectations are continually changing and councils are striving to make efficiencies.

- We aim to address these challenges by making the best use of technology to deliver cost effective services to customers.
- Prevent valuable resources being wasted on providing poor customer service.
- Transform services to make them simple to deliver and easy for customers to access, whilst making use of social media and other methods of communications.

## We work to:-

- Transform services to make them streamlined and easy for you to access and for us to deliver.
- Embed a culture of good practice across the Authority where staff and customers are clear about the standards of service they can expect to receive.

## Council Values

**People** - a people focused business

**Performance** - as individuals and a collective

**Pride** - in our work and outcomes achieved

**Partnership** - delivering outcomes through partnership

“We are a progressive council committed to creating an environment where people can flourish and to providing quality services to those who live and work in the district. Equally as important to the ‘what’ we are trying to achieve, is the ‘how’ the organisation operates and conducts itself. To that end we have introduced an increased focus on values within the organisation to try and ensure that, whatever type of service is being provided, our colleagues all have a shared understanding of the values that are important. We use these within the organisation to help guide discussions around behaviours, culture and performance but at its heart we are simply reflecting how we can apply these values to best deliver the quality service and outcomes that the Council and our residents expect.”

Chief Executive: Stephen Walford - Corporate Plan 2020-2024

# Outcome

We aim to get it right first time to promote high regard and trust in the Council. We will keep you informed on progress of your enquiry.

**When you contact us you can expect us to:**

- Achieve targets and service delivery
- Aim to get it right first time to promote high regard and trust in the Council
- Keep customers informed on progress or delays
- Achieve high satisfaction ratings
- Acknowledge and learn from mistakes
- Have a robust Complaints Policy and Procedure

# Choice

Our intention is to make it easy for you to contact us and to provide a friendly and professional service at all times.

- We aim to provide access to services 24/7 via on-line and digital channels whilst retaining choices including telephone, email, post and in person visits during officer hours
- During office hours, we will offer an appointment service to achieve mutual convenience, either face to face or virtually
- We will offer telephone interpretation services where English is not your first language to make it easier for you to understand and communicate with us
- We will support services including Type Talk for hearing impaired customers
- If you need a private space to talk to someone we will arrange that for you, this may mean coming back later if there is no space available at the time
- We will provide an emergency service outside of our normal working hours

# Quality

We will offer a service which reflect the core values of the council, ensuring that the focus remains on you, the customer.

**When you contact us you can expect us to:**

- Resolve your enquiry wherever possible at the first point of contact
- Offer a range of access options including interpretation service for other languages
- Identify and address any special needs with sensitivity
- Clearly define timescales for service delivery
- We will aim to avoid unnecessary further contact

# Speed

We aim to resolve queries at the first point of contact. If this is not possible we will find the right person who can help\*

## **When you use social media**

- We will monitor our main twitter and Facebook accounts during normal working hours (except bank holidays and public holidays)
- If you contact us via these channels during these times we will respond as soon as possible. There could be delays whilst we investigate but we will keep you updated or log a request for assistance with the appropriate service

## **When you use our online forms**

- We will acknowledge your email within 3 working days
- We will provide the name of the service you have contacted
- We will normally provide a full response to your query in 10 working days
- If we are unable to answer your query in 10 working days we will keep you informed (this does not include service requests where there are statutory deadlines for responses i.e. Planning Applications)

## **When you email us**

- We will acknowledge your email within 3 working days
- We will provide our name and the name of the service you have contacted
- We will normally provide a full response to your email in 10 working days
- If we are unable to answer your query in 10 working days we will keep you informed (this does not include service requests where there are statutory deadlines for responses i.e. Planning Applications)

## **When you telephone us**

- We will answer your call in a friendly and professional manner
- We will aim to answer your call quickly, although at busy times there may be a short wait



- If we need to transfer your call, we will explain the nature of your call to the person you need to speak to. If their voicemail is on, we will retrieve the call and offer to transfer you to the voicemail, or offer to take a message for the person to make contact with you
- Occasionally you may get through to an officers voicemail, these will be checked regularly, messages will be up to date and confirm officer availability and alternative contacts if available

#### **When you write to us by post**

- We will acknowledge your letter within 5 working days
- We will normally provide a full response within 10 working days of receipt
- If we are unable to fully respond within 10 working days we will tell you within those 10 days when you can expect a full response

#### **When you visit Customer Services**

- We will provide 15 minute appointments to deal with your enquiries face to face
- If you require assistance from an officer from a service, e.g. Planning or Housing, we will assist you understanding how that can be arranged
- If you have an appointment you will normally be seen on time
- If you do not have an appointment we will make one with you for the next available slot

\*Some services have statutory response times which may differ from those identified in these standards. Service specific details are provided on our web pages where applicable.

# Behaviour

You can expect our staff to have a professional, helpful, courteous attitude whilst observing the councils values.

**When you contact us you can expect us to:**

- Have a professional, helpful and courteous attitude
- Maintain confidentiality
- Listen to your enquiry
- Take ownership of the enquiry
- Explain what we can do to help or find someone who can help you

**When you visit us:**

- Staff will greet you in a polite, courteous and professional manner
- Where possible we will assist you with use of public access computers to self-serve

**When you telephone us:**

- We will answer in a polite and courteous manner with a standard greeting
- We will provide you with a name and name of the service you have called

# Additional Support

Mid Devon District Council is responsible for delivering a range of services to the people who live, work and visit and invest in the area. The Council are committed to equality and improving quality of life for everyone across the district.

## **We recognise how important accessible information and buildings are:**

- We aim to ensure that our building is accessible for everyone who wants to visit us
- Our reception will be accessible, welcoming and clean
- In our reception area and meeting rooms there are loop systems in place for customers with hearing loss
- We aim to publish information in plain language that is easy to understand, without jargon and unnecessary abbreviations
- If a customer who does not speak English contacts us, we will arrange for telephone interpretation services to assist with the enquiry

This page is intentionally left blank

**Mid Devon District Council**

**Customer Care Policy**

**October 2021**

## Version Control Sheet

*Title:* **Customer Care Policy**

*Purpose:* **To detail the commitment of Mid Devon District Council to provide customer services that meet the varying needs of customers and to set the standards that can be expected from the Council and it's officers to customers.**

*Owner:* **Corporate Manager for Digital Transformation and Customer Engagement**

**Email:** [llewis@middevon.gov.uk](mailto:llewis@middevon.gov.uk)

**Telephone number** 01884 234981

*Date:* **October 2021**

*Version Number:* 3.0

*Status:* DRAFT

*Review Frequency:* **Every 2 years or sooner if required.**

*Next review date:* **October 2023**

*Consultation* **This document was sent out for consultation to the following:**

Operational and Corporate Managers

Leadership Team

Cabinet Member

### Document History

This document obtained the following approvals.

<b>Title</b>	<b>Date</b>	<b>Version Approved</b>
Operational and Corporate Managers	<b>Nov 2021</b>	
Leadership Team	<b>Nov 2021</b>	
Portfolio Holder for Working Environment	<b>Nov 2021</b>	

\*- Delete if not applicable

## 1. Introduction

### Vision

Mid Devon District Council are committed to ensuring that customer service excellence is an integral part of planning, resourcing and delivery of our services. Our vision is to be an organisation that provides consistently high quality customer services, which add value to the customer and to the Council.

## 2. Strategy

The standard of service a customer receives when they contact the Council will influence their view of the Council and potentially the area it serves. At a time when customer expectations are continually changing and councils are striving to make efficiencies we aim to address these challenges by

- Making the best use of technology to deliver cost effective services
- Preventing valuable resources being wasted on providing poor customer service by reviewing what we do and how we do it.
- Transform services to make them simple to deliver and easy for customers to access
- Consider alternative methods of communications such as social media

Whilst this policy is concerned with standards, the Council has a policy specifically for Compliments, Comments and Complaints which is available via the website **Complaints and Feedback Policy (middevon.gov.uk)** or from the Customer Service Team (contact details included in this document). This policy guides customers through the process of making a compliment, comment or complaint.

## 3. Scope

This document applies to all Mid Devon residents and customers of the Council and all Council staff. Where third parties provide services on the Councils behalf, those third parties must be able to deliver a customer service which is broadly in line with this policy.

## 4. Related Documents

- a. Complaints Policy
- b. Chanel Access Strategy
- c. Customer Care Standards

## 5. Customer Service Promise

We will:

Have policies and procedures which support the right of all customers to expect excellent levels of service, and that meet the diverse needs of our customers.

Have staff that are polite and friendly to customers, and have an understanding of our customer needs.

Advise our customers and potential customers about our customer care standards and what can be expected from our services in terms of timeliness and quality.

We aim to improve how we learn from customer feedback, both good and bad and use that to improve services.

We will also ensure staff have the skills and knowledge to support customers and resolve queries at the point of contact wherever possible.

## **6. Customer Service Standards**

We would like all customers to know the standards and behaviours they can expect from us. Customer Service Standards set out how we will behave, and how quickly we will respond.

What the responsibilities of customers are when contacting us by their chosen method.

We will ensure that standards take into account our responsibility to deliver national and statutory standards and targets.

In addition to the standards set to support this policy, some services may also have standards and targets specific to their particular areas of work (e.g. Housing benefit applications, planning applications, grass cutting).

## **7. Measuring success**

Over time we aim to have customers involved in setting and monitoring customer service standards. The Council will develop ways of engaging with customers and encouraging customer feedback.

Performance will be monitored by self-assessment, comparisons with other organisations, customer satisfaction ratings and sometimes feedback from external bodies.

As a Council we are developing ways of getting customer feedback and finding out whether or not our customers are satisfied with the standard of service they have received. Comments, compliments and complaints are an important part of the continued improvement process and will be needed in order for us to be a customer-focused organisation.

## **8. Staff training**

Standards will be included in induction for all new staff. All staff will be required to read and adopt this policy via Learning Management System (LMS) and to review annually. A programme of targeted training and workshops for all staff, to ensure they know what is expected of them within their role in behaviour and response to customers will be delivered. This will be supported by a staff guide, regular promotion of good customer service and useful resources via The Link weekly staff newsletter and other resources available. Appraisals will include discussion around customer focus and customer service, linked to the core competencies for the role.



## COMMUNITY PDG

16 NOVEMBER 2021

### AIR QUALITY ACTION PLAN

**Cabinet Member(s):** Cllr Dennis Knowles

**Responsible Officer:** Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing

**Reason for Report and Recommendation:** To provide Members of the Policy Development Group (PDG) with an opportunity to review and recommend adoption of the revised corporate Air Quality Action Plan (Annex 1) following the recent completion of external and public consultation. Details of the consultation are set out within the report. The consultation responses and outcomes are set out in Annex 2.

The report also provides Members of the PDG with an update on progress with the development of a revised Air Quality Supplementary Planning Document (SPD) together with details and timeline to secure the legal adoption of the document. This is important to the delivery of aspects of the updated Air Quality Action Plan (AQAP), notably in relation to managing the impact of new development and securing planning obligations.

#### RECOMMENDATIONS:

1. **That the PDG recommends to Cabinet that the updated Air Quality Action Plan attached in Annex 1 of this report is adopted**
2. **That the PDG note the details and timeline for the adoption of the updated Air Quality Supplementary via the Planning Policy Development Group and Cabinet as set out in Section 5.3 of the report**

**Relationship to Corporate Plan:** The Air Quality Action Plan aligns with and directly supports a number of key themes in the Corporate Plan 2020-24. In particular, the priority given to the environment and aspirations towards sustainable communities and a sustainable planet. Furthermore, there is a relationship between Local Air Quality Management and Climate Change as set out below.

**Financial and Policy Implications:** The current and future updated plan encompass measures ranging from small-scale initiatives through to major infrastructure projects such as the Cullompton Town Centre relief road. As such, the plan will be delivered through a variety of different mechanisms including the Local Plan Review and planning obligations such as s106 in addition to Government infrastructure funds and the Devon

County Local Transport Plan (LTP 3). There may also be opportunities to bid for future Air Quality Grant funding nationally though this is not certain.

As measures are formalised and updated then these will be further assessed and provisional implementation costs identified where these costs are not already known. Major infrastructure proposals for example are included in the Local Plan Review Infrastructure Plan which outlines estimated costs.

Specifically, the Cullompton Town Centre Relief Road has been awarded £10m funding from the Homes England Housing Infrastructure Fund towards the £15m scheme. The Council is required to part forward fund the project and the £5m balance for the Cullompton Scheme will need to be funded by the Council until such a time as the s106 monies can be collected from future housing development that is unlocked by the provision of the road.

The removal of the s106 pooling restrictions under the Community Infrastructure Levy Regulations from 1<sup>st</sup> September 2019 has allowed for s106 contributions to be pooled or collated from different developments. This has made the collection of s106 funds to deliver specific projects easier as the previous limit on pooling 5 or more obligations has now been removed.

One of the key measures within the proposed Action Plan is an updated to the formal Air Quality Supplementary Planning Document (SPD). The existing SPD has been in place since 2008 and is due for review in line with the revised Action Plan alongside updated methodology to assess the local air quality impact of new development and allow for mitigation including potential s106 contributions to measures within the AQAP. More on the SPD is set out within Section 5.0 of the report.

**Legal Implications:** The adoption and implementation of an Air Quality Action Plan (where an authority has designated one or more Air Quality Management Areas) is a statutory requirement under Part IV of the Environment Act 1995 for Local Air Quality Management (known as the LAQM regime). Under the regime, Local Authorities (LA's) therefore have a duty to pursue measures aimed at improving air quality. The thresholds for air pollution are set out in statutory UK Air Quality Objectives which in turn duplicate EU limit values and binding air quality standards.

These EU requirements are enshrined into UK law and furthermore the Localism Act 2011 allows the Government (Defra) to recharge LA's with the cost of meeting these standards if it chooses to do so.

The remodelled statutory Government guidance to the LAQM regime and the Clean Air Strategy place greater emphasis on delivery of effective intervention mechanisms to improve existing hot-spots and the need to mitigate for the effects of new development and public exposure to poor air quality.

**Risk Assessment:** In addition to meeting our statutory duties and the risk of financial penalties under the Localism Act 2011 if we fail to do so (see above), a failure to make improvements to air quality would be directly contrary to our adopted Public Health plan. Therefore, we would not address a priority health target locally. Furthermore, the successful implementation of an Air Quality Action Plan underpinning relevant Local Plan policies is essential to mitigate against the impact of significant new development district-wide and to deliver the wider community infrastructure benefits.

Given the inherent requirement to have planning obligation measures in place in order to deliver major parts of the plan then the successful implementation of the Air Quality Action Plan should be considered against the requirement to update the SPD on Air Quality.

Air quality has an increasingly high profile in terms of both local and national policy in addition to wider reporting of the issue across regional and national media. In turn this is generating public awareness beyond local communities within our specific AQMA areas.

**Equality Impact Assessment:** No equality issues specifically identified in this report. Nonetheless, whilst poor local air quality impacts everyone, air quality standards are health-based and designed to protect the most vulnerable persons including those who are young, elderly and/or have pre-existing disabilities arising from sensitive medical conditions. Consequently, the Council's Air Quality Action Plan seeks to proactively protect some of those residents with protected characteristics.

**Impact on Climate Change:** None directly arising from the report. The LAQM statutory regime does not include carbon dioxide or other major climate change gases. However, there will be impacting emissions from road transport and other relevant sources targeted within the Council's Air Quality Action Plan (AQAP) and consequently a potential surrogate benefit between tackling local air quality issues and climate change. However, it is also recognised that national policies have resulted in a consumer/manufacture shift away from diesel to petrol (or petrol/hybrid) powered road vehicles due to local pollution concerns. This may have a negative impact nationally on carbon dioxide emissions due to the inherent better performance of modern diesel engines in this respect. Nonetheless, whilst there are measures in the MDDC AQAP promoting a switch to low-emission/non-combustion engine vehicles there are none directly targeting diesel vehicles in this context.

## **1.0 Air Quality as a Public Health concern**

- 1.1 Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. It is the fourth greatest threat to public health after cancer, heart disease and obesity.
- 1.2 Nationally, the health cost of poor air quality is estimated at £8-20 billion each year and Public Health England assess that long-term exposure to man-made pollution has an annual effect equivalent to 28-36,000 deaths (Committee on the Medical Effects of Air Pollutants). A recent European survey (European Heart Journal) has put forward an even higher UK figure of 64,000, meaning the impact is now similar to that of smoking.
- 1.3 Furthermore, for the first time in the UK (possibly the world) air pollution has been recognised as a cause of a person's death. In December 2020, Southwark Coroner's Court in London found that air pollution "made a material contribution" to the death of nine-year-old Ella Adoo-Kissi-Debrah.
- 1.4 Ella had a rare type of acute asthma; she was particularly susceptible to the toxic gases and particles in air pollution. In his verdict, the coroner said the cause was "...multi-factorial. It was down to both genes, and the environment". From a legal perspective, although this decision does not have any binding impact on other courts, it is still important as the first formal legal recognition of air pollution as contributing to the death of a particular individual.
- 1.5 In accordance with our legal duties, Mid Devon has declared Air Quality Management Areas in Crediton and Cullompton due to exceedances of air quality standards leading to the adoption and implementation of an Air Quality Action Plan. For context, Ella had lived near the South Circular Road in Lewisham and died in 2013, following an asthma attack. Pollution at this location also exceeded statutory air quality objectives, but at an order of magnitude higher than any levels recorded in Mid Devon.

## **2.0 Air Quality Action Plan Measures and activity during 2020**

- 2.1 As previously reported to members in March 2021 (Community PDG), there are twenty-one measures identified in the current Air Quality Action Plan. The

measures range from small-scale projects such as car clubs, to large infrastructure projects such as the Cullompton Town Centre Relief Road.

2.2 Planning obligation (s106) funding is a key mechanism in delivering many of the measures. There is ongoing dialogue between Public Health and the S106 Monitoring officer, other officers in relation to identifying new air quality projects and the release of funds for projects already earmarked.

2.3 As also previously reported to members, a number of projects were due to be completed in early 2020 designed to accelerate delivery of the wider plan overall and provide resilience/additional capability going forward. These were duly accomplished and were intended to inform a comprehensive update of the Action Plan later in 2020 however this was not possible due to the ongoing Covid pandemic. Nonetheless, those projects completed included:

- Review and redesign of our air quality monitoring network
- Commissioning 4 no. 'AQ Mesh' air quality monitoring devices. These are highly mobile, solar/battery powered lamp-post mounted instruments capable of real-time monitoring 24/7/365 for nitrogen oxides and particulate matter. They provide a cost-effective but significant strengthening of our monitoring capabilities and will be used flexibly to support our development of Action Plan measures in each air quality management area and assessment work in relation to new major development proposals
- Crediton Traffic and Urban Realm Feasibility Study
- A comprehensive Low Emission Strategy for Cullompton – this will link to the assessment work on the town centre relief road and provide a wider plan for further improvements in the town

### 3.0 **Action Plan update 2021**

3.1 Due to the Covid pandemic, the planned update of the Action Plan and other related projects was moved into 2021.

3.2 In November 2020, approval was granted to allocate circa £32k of s106 Air Quality project funding in order to deliver the projects and work plan for 2021 set out in below, building on work completed 12-months previously.

- 3.3 In summary, the Air Quality project funding enabled the delivery of three interconnected projects or work-streams as follows:
- Project 1 – Air Quality Action Plan (AQAP) Update
  - Project 2 - Update to the Supplementary Planning Document on Air Quality and Development
  - Project 3 – Mid Devon Air Quality Sensor (monitoring) Data and Public Reporting
- 3.4 Due to the specialist nature of this work and the need for independent technical and quality assurance to meet Defra requirements, Ricardo Energy and Environment were commissioned to complete this work, supported extensively by officers as required.
- 3.5 Ricardo have in-depth experience in preparing AQAPs and SPDs for local authorities throughout the UK, including AQAPs recognised as examples of good practice by Defra and the Devolved Administrations. The Ricardo project delivery team comprised several specialists, all of whom have worked on the previous LAQM work packages for MDDC, and have extensive experience in supporting other local authorities across the UK in the development of AQAPs and associated LAQM work.
- 3.6 In early 2021, Ricardo completed a review and working draft of the AQAP report which included an updated source apportionment analysis (detailed breakdown of pollutant sources for action planning purposes), review of existing policies and preparation of a provisional (long) list of measures.
- 3.7 As set out to members of the PDG in March (see update report), the next steps were to confirm the provisional list of measures and hold the core steering group meeting to assess which measures are taken forward in the AQAP process.
- 3.8 The specific make-up of the core steering group was discussed in March and include officers from relevant internal services, a member representative of this PDG and external bodies:
- Corporate Manager for Public Health, Regulation and Housing
  - Public Health – air quality management and licensing representatives
  - Forward Planning – Principal Planning Officer
  - Carbon and climate change lead officer
  - Cllr John Downes – CPDG representative
  - Cllr Dennis Knowles – Cabinet lead

- Crediton Town Council – nominated representative
- Cullompton Town Council – nominated representative
- Devon County Council – Senior Highways representative
- Ricardo Energy and Environment - consultants

#### **4.0 Air Quality Action Plan workshop and consultation**

- 4.1 Prior to meeting in June, the workshop group engaged in a remote survey to review the initial long-list of measures and enable any additional, proposed measures to be identified. Full details of this process and the feedback from stakeholders is set out in Appendix A of the AQAP.
- 4.2 In June, the workshop group then met to review and refine the long-list of measures and reduce these to a confirmed shortlist. This subsequently formed the basis of a draft, updated AQAP which was further consulted upon with the workshop stakeholder group over the summer period.
- 4.3 Following completion of the work of the group and further development of the plan by Ricardo, a wider public consultation on the draft, updated AQAP was completed by MDDC in September – October 2021
- 4.4 The external and public consultation commenced on the 20 September 2021 and was completed via a dedicated web-site page which can currently still be viewed at <https://www.middevon.gov.uk/your-council/consultation-involvement/current-consultations/>

This page set out a summary of the AQAP and invited comment and response via a web link. This was contextualised against three broad priorities and nine topics within the plan:

- **Priority 1 – Tackling NO<sub>2</sub> hotspots**
- **Priority 2 – Improving the overall air quality across Mid Devon**
- **Priority 3 – Managing PM<sub>2.5</sub> (ultra-fine particulates) exposure**

Topics:

- Alternatives to private vehicle use
- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information

- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency

A link to the full AQAP and more about how to respond in writing if preferred was included on the page. This page was accompanied by a media press release that was also circulated to all members internally and to all town and parish councils.

- 4.5 In addition to the above, a targeted email was sent to those external organisational contacts involved in the workshop as well as neighbouring Local Authorities and Public Health England in order to meet Defra consultation requirements.
- 4.6 The consultation through all channels closed on the 11 October 2021.
- 4.7 Despite a three-week consultation period and a tailored, but extensive, consultation exercise only one response was received. This may be indicative of the positive, early stakeholder engagement in the plan development. It may also reflect a general, wide support for the AQAP and its proposals (comments are typically provided if people object rather than approve of change). Another, less positive factor, may also be the relative breadth and technical nature of the document, containing several themes with a detailed air pollution source apportionment and some 25 specific measures. The document must also be structured within a prescribed Defra template which is designed to present information as required to Government as opposed to being a bespoke, public-facing document.
- 4.8 The single respondent was a member of the public and their full response is set out in Annex 2 of this report with all comments provided in full/verbatim as received but with any personal data removed. A response by the lead officer (Corporate Manager) is also set out in the Annex.
- 4.9 As a result of the final consultation exercise there have been no further technical amendments to the proposed updated AQAP as attached.
- 5.0 **Supplementary Planning Document (SPD)**
- 5.1 The SPD is an important, added document that sits alongside our adopted AQAP, specifically in relation to the management of potential air quality impacts arising from new development across the district including the two district AQMAs at Crediton and Cullompton.



5.2 Following internal review with both the Public Health and Forward Planning Teams including Development Management colleagues, a draft, updated Air Quality SPD has been prepared by Ricardo in October 2021.

5.3 In summary, the purpose of the SPD document is to:

1. Provide guidance on the relevant policies adopted in the Mid Devon Local Plan 2013 – 2033 in relation to air quality
2. Assist developers in determining when an air quality assessment is required for a new development
3. Provide guidance through the emissions and air quality assessment procedures
4. Identify suitable mitigation measures to be included at the planning stage and set out the relationship with the adopted AQAP

5.4 The following timeline has been agreed with the Forward Planning team in order to move forward with the formal SPD consultation and adoption requirements

- By end of year 2021, draft HRA (Habitats Regulations Assessment) and SEA (Strategic Environmental Assessment) as required to accompany the SPD (Forward Planning with some input from Ricardo)
- Agree consultation materials with Comms team. Once agreed Forward Planning to discuss regulatory requirements
- January 2022 PPAG (Planning Policy Advisory Group) and Cabinet – Corporate Manager to lead with Forward Planning support
- February 2022 (potentially into March 2022) – minimum 4-week consultation with allowance for 6-weeks if members require this
- March/April 2022 – process representations. Summary of key points provided to Ricardo. Ricardo update SPD where relevant
- April/May 2022 – PPAG and Cabinet for Adoption (Corporate Manager lead)
- May/June 2022 – Place adoption materials on website and notify stakeholders

## 6.0 Recommendations

6.1 That the PDG recommends to Cabinet that the updated Air Quality Action Plan attached in Annex 1 of this report is adopted.

6.2 That the PDG note the details and timeline for the adoption of the updated Air Quality Supplementary via the Planning Policy Development Group and Cabinet as set out in Section 5.3 of the report.

**Contact for more Information:** Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk)

**Circulation of the Report:**

Cabinet Member for Community Well Being (Cllr Dennis Knowles)  
Members of the Community Policy Development Group  
All Leadership Team  
All Corporate Management Team  
All Operations Managers  
Principal Forward Planning Officer

**List of Background Papers:**

*MDDC and Crediton Town Council:*

Mid Devon Air Quality Action Plan 2017-21

(<https://www.middevon.gov.uk/media/345645/aqap-mid-devon-district-council-2017.pdf>)

Cabinet 31st January 2019, 30th May 2019 - Housing Infrastructure Fund  
Community PDG 23<sup>rd</sup> March 2021– Air Quality Action Plan update

Crediton Traffic and Urban Realm Feasibility Study (PJ Associates September 2018)

*National legislation, Strategy and Guidance:*

Local Air Quality Management legislation and regulations

(<https://www.gov.uk/government/publications/2010-to-2015-government-policy-environmental-quality/2010-to-2015-government-policy-environmental-quality#appendix-5-international-european-and-national-standards-for-air-quality>)

Local Air Quality Management Statutory Policy Guidance

(<https://www.gov.uk/government/publications/local-air-quality-management-policy-guidance-pg09>)

National Clean Air Strategy 2019 (DEFRA)

(<https://assets.publishing.service.gov.uk/./clean-air-strategy-2019.pdf>)

*Air quality and public health:*

Associations of long term average concentrations of nitrogen dioxide with mortality -  
A report by the Committee on the Medical Effects of Air Pollutants 2018

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/734799/COMEAP\\_NO2\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf))

European Heart Journal report on Cardiovascular Disease and Air Pollution 2019

(<https://academic.oup.com/eurheartj/article/40/20/1590/5372326>)

**Annex 1 – Updated Air Quality Action Plan (v1.2 August 2021 – attached separately)**

## Annex 2 - Summary of the final Air Quality Action Plan consultation responses and outcomes

### Responses (verbatim)

No.	Consultee type	Open field	<i>Comments and outcomes</i>
1	Member of the Public	<p><i>Good evening,</i></p> <p><i>I read the Action Plan with interest and was surprised that air quality associated with the storage, spreading and transport of cattle slurry, chicken waste and pig manure was not included. As a resident of a village which is experiencing ever increasing levels of air pollution due to the smell caused by intensive farming I would like this issue to be part of the consultation.</i></p> <p><i>Please could you confirm that this would be possible.</i></p>	<p>The dominant and key emissions associated with animal livestock production and animal waste storage are essentially greenhouse gases (GHGs - methane and nitrous oxide) alongside ammonia. Whilst impactful in terms of climate change they are not specific pollutants included within the scope of the Part IV of the Environment Act 1995 for Local Air Quality Management (LAQM regime). As a result the Council's statutory AQAP cannot include measure to tackle non-LAQM pollutants.</p> <p>The AQAP must focus on those sources set out in the AQAP source apportionment relevant to local air quality pollutants of concern within our district Air Quality Management Areas – therefore Nitrogen dioxide and particulate matter largely associated with road transport sources.</p> <p>The Government's Clear Air Strategy and other climate change policies do seek to separately address emissions of GHGs from agricultural sources.</p> <p>Furthermore, odour is a potential statutory nuisance under the Environmental Protection Act 1990 and as such the Council has existing powers to assess specific concerns if relevant under this legislation.</p>

# Mid Devon



# Devon

## DISTRICT COUNCIL

## Mid Devon District Council Air Quality Action Plan

In fulfilment of Part IV of the  
Environment Act 1995  
Local Air Quality Management

August 2021

Local Authority Officer	Simon Newcombe
Department	Public Health and Housing Options /Corporate Management Team
Address	Mid Devon District Council Phoenix House Phoenix Lane Tiverton EX16 6PP
Telephone	01884 255255
E-mail	<a href="mailto:snewcombe@middevon.gov.uk">snewcombe@middevon.gov.uk</a>
Report Reference number	MDDC AQAP 2021 ConsultDraft v1.1
Date	August 2021

DRAFT

## Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the actions we will take to improve air quality in Mid Devon between 2021 – 2025.

This AQAP replaces the previous Plan which ran from 2017 – 2021. Projects delivered through the past AQAP include:

- Implementation of taxi licensing conditions
- Air quality assessment of Crediton traffic management schemes
- Development of a Low Emission Strategy for Cullompton
- Completion of a Cullompton / Wellington rail link feasibility study
- Review of the current monitoring in the region
- Review of MDDC planning policies
- Exploration of alternative parking and traffic flow measures

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The impact of poor air quality on less affluent areas is also a concern as studies have shown these communities can be disproportionately impacted by pollution emissions.<sup>1,2</sup>

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion.<sup>3</sup> Mid Devon District Council is committed to reducing the exposure of people in Mid Devon to poor air quality in order to improve health.

We have developed actions that can be considered under nine broad topics:

- Alternatives to private vehicle use
- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport

<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

<sup>3</sup> Defra. Abatement cost guidance for valuing changes in air quality, May 2013

- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency

Our priorities are to protect our citizens from the harmful impacts of poor air quality by reducing concentrations of NO<sub>2</sub> to within legal limits and beyond, in all areas of the district where the population is at risk to exposure. Alongside this objective, MDDC are also committing to reducing levels of all pollutants in ambient air, with a focus on PM<sub>2.5</sub>.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Mid Devon District Council's direct influence.

### Responsibilities and Commitment

This AQAP was prepared by the Environmental Protection Department of Mid Devon District Council with the support and agreement of the following officers and departments:

- Simon Newcombe (Corporate Manager for Public Health, Regulatory Services and Housing, MDDC)
- Cllr Dennis Knowles (Cabinet Member for Community Wellbeing, MDDC)
- Joy Norris (Town Clerk, Cullompton Town Council)
- Poie-Yee Li (Principal Forward Planning Officer, MDDC)
- Rachel Avery (Town Clerk, Crediton Town Council)
- Stuart Jarvis (Principal Transport Planning Officer, Devon County Council)
- Tanya Wenham (Operations Manager Public Health, MDDC)
- Tom Keating (Lead Licensing Officer, MDDC)



## Mid Devon District Council AQAP

- Cllr John Downes (Crediton Town Council, Environment Policy Development Group, Waste Management Efficiency Committee, Planning Committee, MDDC)
- Jason Ball (Climate and Sustainability Specialist, MDDC)

This AQAP has been approved by: (Date of Cabinet meeting to be inserted)

The final version of this plan will be reviewed by the MDDC Community Policy Development Group for subsequent recommendation for formal adoption by the MDDC Cabinet'

This may also include support from relevant senior officers within the transport and public health functions of Devon County Council.

This AQAP will be subject to an annual review, appraisal of progress and reporting to the MDDC Community Policy Development Group. Progress each year will be formally reported in the Annual Status Reports (ASRs) produced by Mid Devon District Council, as part of our statutory Local Air Quality Management duties, provided to Defra for appraisal.

If you have any comments on this AQAP please send them to Tanya Wenham at:

Public Health

Mid Devon District Council

Phoenix House

Phoenix Lane

Tiverton

EX16 6PP

01884 255255

[health@middevon.gov.uk](mailto:health@middevon.gov.uk)

# Table of Contents

<b>Executive Summary .....</b>	<b>i</b>
Responsibilities and Commitment .....	ii
<b>Introduction.....</b>	<b>1</b>
Summary of Current Air Quality in Mid Devon.....	2
Mid Devon District Council's Air Quality Priorities .....	5
Public Health Context .....	5
Planning and Policy Context .....	6
Regional planning and policy context.....	6
<i>Devon Climate Emergency</i> .....	6
Local planning and policy context .....	7
Source Apportionment .....	15
Required Reduction in Emissions .....	16
Key Priorities .....	26
<b>Development and Implementation of Mid Devon District Council's AQAP .....</b>	<b>28</b>
Consultation and Stakeholder Engagement.....	28
Steering Group .....	28
<b>AQAP Measures.....</b>	<b>29</b>
<b>Appendix A: Response to Consultation .....</b>	<b>37</b>
<b>Appendix B: MDDC Local Plan Key Policies.....</b>	<b>46</b>
<b>Appendix C: Source Apportionment.....</b>	<b>50</b>
<b>Appendix D: Longlist of actions.....</b>	<b>53</b>
<b>Glossary of Terms .....</b>	<b>61</b>

## List of Tables

Table 1 – National Air Quality Objectives (NAQO) for NO <sub>2</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> .....	2
Table 2 – Nitrogen dioxide concentrations measured at locations with exceedances and the required reduction in NO <sub>x</sub> emissions from road traffic to achieve compliance .....	17
Table 3 – Nitrogen dioxide concentrations measured at locations with exceedances and the required reduction in NO <sub>x</sub> emissions from road traffic to achieve 10% below compliance .....	17
Table 4 – NO <sub>x</sub> concentrations for major vehicle types, calculated using measured road NO <sub>x</sub> concentrations (derived from NO <sub>x</sub> to NO <sub>2</sub> calculator).....	18
Table 5 – Contribution of PM <sub>10</sub> concentrations from major vehicle types, calculated using measured road PM <sub>10</sub> concentrations.....	19
Table 6 – NO <sub>x</sub> source apportionment by background and vehicle type (road transport emissions from major roads) at monitoring locations within MDDC (µg.m <sup>-3</sup> ) for the baseline fleet, 2019 (NO <sub>2</sub> concentrations derived from the NO <sub>x</sub> to NO <sub>2</sub> calculator) .....	21

Table 7 – PM <sub>10</sub> source apportionment by background and vehicle type (road transport emissions from major roads) at monitoring locations within MDDC (µg.m <sup>-3</sup> ) for the baseline fleet, 2019 .....	23
Table 8 – PM <sub>2.5</sub> source apportionment by background and vehicle type (road transport emissions from major roads) at all monitoring locations within MDDC (µg.m <sup>-3</sup> ) for the baseline fleet, 2019 .....	25
Table 9 – Consultation Undertaken .....	28
Table 10 – Air Quality Action Plan Measures .....	30
Table A. 1 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Develop a priority matrix of low emission vehicle options for MDDC’s vehicle fleet.....	37
Table A. 2 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Upgrade MDDC’s vehicle fleet.....	38
Table A. 3 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: MDDC staff travel strategy.....	38
Table A. 4 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Low emission taxi programme .....	39
Table A. 5 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Upgrade / retrofit buses .....	40
Table A. 6 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Electric vehicle strategy including development of EV charging network.....	40
Table A. 7 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Fleet recognition scheme .....	41
Table A. 8 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Clean air campaign .....	42
Table A. 9 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Solid fuel burning public information campaign.....	43
Table A. 10 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Anti-idling campaign.....	44
Table A. 11 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Promote data captured from the AQ monitoring network .....	44
Table A. 12 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Promotion of Car Share Devon scheme .....	45
Table B. 1 – Strategic policies .....	46
Table B. 2 – Site allocation policies .....	47
Table B. 3 – Sustainable development principles .....	49
Table C. 1 – NO <sub>x</sub> source apportionment for all road transport and background at all monitoring locations within MDDC (%) for the baseline fleet, 2019 .....	50
Table C. 2 – PM <sub>10</sub> source apportionment for all road transport and background at all monitoring locations within MDDC (%) for the baseline fleet, 2019 .....	51
Table C. 3 – PM <sub>2.5</sub> source apportionment for all road transport and background at all monitoring locations within MDDC (%) for the baseline fleet, 2019 .....	52

## List of Figures

Figure 1 – Monitoring locations across MDDC, including the Crediton and Cullompton AQMAs .....	15
--	----

Figure 2 – Stacked bar chart showing NO<sub>x</sub> source apportionment for all road transport and background for monitoring locations within MDDC (%), for the baseline fleet, 2019.....20

Figure 3 – Stacked bar chart showing PM<sub>10</sub> source apportionment by background and vehicle type (road transport emissions from major roads) for monitoring locations within MDDC (%), for the baseline fleet, 2019 .....22

Figure 4 – Stacked bar chart showing PM<sub>2.5</sub> source apportionment by background and vehicle type (road transport emissions from major roads) for each monitoring location within MDDC (%), for the baseline fleet, 2019 .....24

DRAFT

## Introduction

This report outlines the actions that Mid Devon District Council (MDDC) will deliver between 2021 – 2025 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Mid Devon area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Mid Devon's air quality ASR.

DRAFT

## Summary of Current Air Quality in Mid Devon

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The impact of poor air quality on less affluent areas is also a concern as studies have shown these communities can be disproportionately impacted by pollution emissions<sup>4,5</sup>.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion<sup>6</sup>. Mid Devon District Council (MDDC) is committed to reducing the exposure of people in Mid Devon to poor air quality in order to improve health.

Mid Devon has undertaken regular reviews of ambient air quality, fulfilling its obligations set by Part IV of the Environment Act (1995). The act sets out the Local Air Quality Management (LAQM) process; which requires authorities to regularly review and assess ambient air quality and work towards a target limit value for concentrations of six pollutants in areas where the population is regularly exposed<sup>7</sup>. Following the enactment of the Environment Act, MDDC began a monitoring campaign to identify areas within the city that are in exceedance of the NAQS target limit values.

Table 1 provides details of the current National Air Quality Objectives (NAQO) for Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>).

**Table 1 – National Air Quality Objectives (NAQO) for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>**

Pollutant	Concentration	Objective
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	200 µg.m <sup>-3</sup> not to be exceeded more than 18 times a year	1 hour mean
	40 µg.m <sup>-3</sup>	Annual mean
<b>Particulate matter, ≤ 10 µm (PM<sub>10</sub>)</b>	50 µg.m <sup>-3</sup> not to be exceeded more than 35 times a year	24 hour mean
	40 µg.m <sup>-3</sup>	Annual mean
<b>Particulate matter, ≤ 2.5 µm</b>	25 µg.m <sup>-3</sup>	Annual mean

<sup>4</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

<sup>5</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

<sup>6</sup> Defra. Abatement cost guidance for valuing changes in air quality, May 2013

<sup>7</sup> <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits>

Pollutant	Concentration	Objective
(PM <sub>2.5</sub> )	Target of 15% reduction in concentrations in urban background areas	

The main source of air pollution in Mid Devon is road traffic emissions from major roads, notably the M5, A373, A361, A377, A396 and A3126. Traffic emissions are a major source of nitrogen dioxide (NO<sub>2</sub>) and particulate matter of different size fractions (PM<sub>10</sub> and PM<sub>2.5</sub>). Other pollution sources, such as commercial, industrial and domestic, also contribute to pollutant concentrations.

In accordance with the LAQM process, MDDC declared two Air Quality Management Areas (AQMAs) as a result of areas where the population is exposed to concentrations of pollutants in exceedance of NAQOs. The two AQMAs are described in the declaration as the following<sup>8</sup>:

- **Cullompton AQMA** – An area encompassing the entire built-up area of the town of Cullompton was declared in December 2006. This AQMA is the result of exceedances of the annual mean NO<sub>2</sub> concentration NAQO.
- **Crediton AQMA** – An AQMA encompassing the majority of the built-up area of Crediton was declared in November 2004. This AQMA is the result of exceedances of the annual mean NO<sub>2</sub> concentration NAQO, as well as exceedances of the 24 hour mean PM<sub>10</sub> NAQO. However, Crediton AQMQ has had no exceedances of the 24 hour mean PM<sub>10</sub> NAQO in the five years prior to 2018, leading to the Council planning on revoking the AQMA for PM<sub>10</sub> and have decommissioned the automatic monitoring site.

In place of automatic monitoring sites, MDDC installed four indicative monitoring stations (AQMesh) in September/October 2019 for the purpose of highlighting any potential pollution hotspots. Two of these sites are located in Cullompton, and a further two in Crediton. Each monitoring site measures NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.

The most recent AQAP (2017) set out a number of actions which aimed to tackle air quality issues across Mid Devon, including those within the Council’s control, and those beyond the direct influence of MDDC. Actions in the most recent Plan include:

- Alternatives to private vehicle use

<sup>8</sup>Mapped location and further details can be found from: [Local Authority Details - Defra, UK](https://www.gov.uk/government/collections/local-authority-details)

- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency

This AQAP builds on Ricardo's previous work in reviewing the current MDDC Air Quality Action Plan.<sup>9</sup> It details Mid Devon's new plan to reduce NO<sub>2</sub> concentrations in the two AQMA's and across the city, and also details further measures to reduce the level of PM<sub>2.5</sub>.

DRAFT

---

<sup>9</sup> Review of Mid Devon District Council Air Quality Action Plan, Ricardo Energy & Environment, June 2020



## Mid Devon District Council's Air Quality Priorities

### Public Health Context

There is increasing scientific evidence demonstrating the impact of poor ambient air quality on human health. In 2016, the Royal College of Physicians reported that exposure to poor air quality contributed to the equivalent of 40,000 deaths per year.<sup>10</sup> In 2018, the Committee on the Medical Effects of Air Pollutants (COMEAP) provided an updated report on the association between long-term exposure to increased levels of NO<sub>2</sub> and mortality, which estimated that between 28,000 and 36,000 premature deaths in the UK could be linked to air pollution every year<sup>11</sup>. The impact on the economy is estimated to be approximately £20 billion every year, through healthcare related costs and the loss of workplace productivity.

There are several air pollutants that may contribute to poorer health. In Mid Devon the primary pollutant of concern is NO<sub>2</sub>. Although there have been no exceedances reported in the 2020 Annual Status Report,<sup>12</sup> it does however highlight two diffusion tubes within 10% of the objective in Crediton (DT20) and Cullompton (DT12) AQMAs. At present, ambient concentrations of particulate matter in Mid Devon comply with air quality standards, hence the plans for the Crediton PM<sub>10</sub> AQMA to be revoked. However, this Plan will still consider measures to reduce exposure to PM.

The UK Government has responded to the latest research on the effects of PM<sub>2.5</sub>, which indicates there is no real safe threshold for the pollutant, by outlining aims to reduce concentrations below the World Health Organisation's (WHO) recommended limit values by 2030. At present, Mid Devon is under no statutory obligation to monitor PM<sub>2.5</sub> concentrations but is required to consider options for addressing emissions of PM<sub>2.5</sub> at a local level. Many of the measures implemented within this action plan, designed to target reductions in NO<sub>2</sub>, will also have co-benefits for reducing concentrations of particulate matter.

<sup>10</sup> <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

<sup>11</sup> <https://www.gov.uk/government/publications/nitrogen-dioxide-effects-on-mortality>

<sup>12</sup> Mid Devon District Council 2020 Annual Status Report: [https://www.middevon.gov.uk/media/351850/mid-devon\\_asr\\_2020\\_final\\_i1.pdf](https://www.middevon.gov.uk/media/351850/mid-devon_asr_2020_final_i1.pdf)

## Planning and Policy Context

### Regional planning and policy context

#### ***Devon and Torbay Local Transport Plan 3***

The Devon and Torbay Local Transport Plan 3 (LTP3)<sup>13</sup> is a 15-year plan, covering the period 2011 – 2026. The plan aims to deliver a transport system that can meet economic, environmental and social challenges. The five key objectives of the plan, which aim to develop a low carbon transport system that offers choice and encourages sustainable travel behaviour, are:

- Deliver and support new development and economic growth.
- Make best use of the transport network and protect the existing transport asset by prioritising maintenance.
- Work with communities to provide safe, sustainable and low carbon transport choices.
- Strengthen and improve the public transport network.
- Make Devon the 'place to be naturally active'.

The Strategic Connections Strategy aims to:

1. Manage maintenance of the transport network.
2. Proactively address congestion and increased demand.
3. Support low carbon measures.
4. Promote sustainable communities.

#### ***Devon Climate Emergency***

On 26<sup>th</sup> June 2019 our elected Members voted unanimously to support the ambitious cut in carbon emissions by signing the Devon Climate Declaration. The declaration acknowledges our need to understand the near-term and future risks for Mid Devon and beyond, and sets out the joint ambition with our partners to plan for how our infrastructure, public services and communities will have to adapt to a 1.5°C rise in global average temperature.

<sup>13</sup> Devon and Torbay Local Transport Plan 5, 2011 – 2026. Available from: <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/>

It was agreed that the Policy Development Group (PDG) for Environment would act as the initial owner of policy activity regarding Climate Change Emergency within the Council.<sup>14</sup>

### Local planning and policy context

#### ***Current MDDC AQAP***

The current MDDC AQAP<sup>15</sup> outlines the actions that the Council will take to improve air quality in Mid Devon 2017 – 2021. This plan aims to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Mid Devon District area. Some AQAP priorities to be considered in the planning of future developments are:

- To work with Devon County Council and the key bus service providers to maximise patronage and link the bus routes more effectively.
- To improve the Electric Vehicle Charging Network through the installation of units at Council Parks or other appropriate locations and within design specifications for future housing developments (home charging).
- To support alternative forms of transport such as local car sharing schemes, e-bikes, cycles and local bus services that minimise personal car use.
- To adopt Local Plan Policies (Low emission strategies) and monitor their implementation in all future development applications.
- To expand and improve the local network of foot and cycle paths to facilitate a move towards walking or cycling as an alternative to car use for short to medium length journeys.
- To pro-actively engage all stakeholders with responsibility and or/interest in the development of roads, transport and infrastructure to ensure air quality is central to planning and delivery.
- To acknowledge that the car will remain the only alternative for some rural locations and to take this into consideration when making policy or undertaking measures that may directly or indirectly affect rural communities.

<sup>14</sup> Devon Climate Emergency. Available from: <https://www.middevon.gov.uk/residents/devon-climate-emergency/>

<sup>15</sup> Mid Devon District Council Air Quality Action Plan (2017). Available from: <https://www.middevon.gov.uk/media/345645/aqap-mid-devon-district-council-2017.pdf>

- To continue to monitor Mid Devon's two AQMAs and carry out mitigation strategies that will result in their removal from the register.

### **Mid Devon Local Plan 2013 – 2033**

The Mid Devon Local Plan 2013 – 2033<sup>16</sup> which was adopted in July 2020 supersedes the previous Local Plan which was adopted in three parts: The Core Strategy 2026 (Local Plan Part 1) adopted in 2007, the Allocations and Infrastructure Development Plan Document (AIDPD) (Local Plan Part 2) adopted in 2010 and the Local Plan Part 3: Development Management Policies, adopted in 2013.

As part of the spatial strategy, developments will be targeted to *“Protect and enhance the key environmental assets including heritage, biodiversity and air quality”* within Cullompton and other market towns.

A number of key strategies have been updated since the previous Local Plan, the following list provides information on the original policy and the more recently adopted policy. Where a policy has been replaced this document will explore the details of that specific policy.

- **AL/TIV/5** Eastern Urban Extension Carbon Reduction & Air Quality, deleted as covered by Development Management policies on renewable energy, air quality and transport and pollution (2013).
- **AL/CU/5** North West Cullompton Carbon Reduction & Air Quality, replaced by CU5 North West Cullompton Carbon Reduction and Air Quality.
- **AL/CU/15** Cullompton Air Quality, replaced in part by S11 Cullompton; also, each site allocation within Cullompton is required in their policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts.
- **AL/CRE/8** Crediton Air Quality, replaced in part by S12 Crediton CRE11 Crediton Infrastructure.
- **DM6** (LP part 3) Transport and Air Quality, replaced by DM3 Transport and air quality.

<sup>16</sup> MDDC Adopted Local Plan. Available from: <https://www.middevon.gov.uk/residents/planning-policy/adopted-local-plan/>

The new Local Plan includes key policies which are related to air quality. An exhaustive list of the key policies can be found in Appendix B: MDDC Local Plan Key Policies. A summary of the key policies addressed in Appendix C can be found below. The policies identified within the Local Plan explore the relationship between the Local Plan and air quality impacts and mitigation. The policies can be split up into strategic policies, specific site allocation policies and sustainable development principles.

### **Strategic policies**

There are five strategic policies within the MDDC Local Plan which relate to air quality. They are the S1 Sustainable Development Priorities, S2 Amount and Distribution of Development, S8 Infrastructure, S11 Cullompton and S12 Crediton. The key message from this set of policies is to prevent and improve air quality issues within the area, specifically at Crediton and Cullompton. This is planned to be achieved by including new road linkages to relieve traffic congestion in town centres, improve infrastructure for new developments, to offer co-benefits for air quality and other planning objectives, and to implement monitoring to assess if pollutants have been reduced to a level where AQMAs can be withdrawn.

### **Site allocation policies**

There are three areas within Mid Devon which have been identified to include site allocation policies referencing air quality, they are Cullompton, Crediton and Tiverton. All three areas highlight policies to implement proposed developments accounting for the effects they will have on traffic congestion and subsequently air quality impacts. The developments include policies relating to transport provisions, such as a travel plans and non-traditional transport measures. Developments will also include carbon reduction and air quality impact assessments to help minimise the impacts of the development on the environment. As Cullompton and Crediton both have AQMAs there is a policy for both areas relating to infrastructure to help deliver air quality improvements within and adjacent to the AQMAs.

### **Sustainable development principles**

There are two sustainable development principles which relate to air quality in the Local Plan; DM3 Transport and Air Quality and DM4 Pollution. DM3 encompasses

developments which give rise to vehicular movement. If this is the case, the following documents are required to be submitted: Integrated Transport Assessment, Travel Plan, Traffic Pollution Assessment, and a Low Emissions Assessment. DM4 stipulates that any proposals that may negatively impact the environment must be accompanied by a Pollution Impact Assessment and implement mitigation schemes where necessary.

***Mid Devon Supplementary Planning Document on Air Quality and Development***

Mid Devon Supplementary Planning Document (SPD)<sup>17</sup> was developed using the following key local policies:

- Policy **AQ1**: Outlines the criteria for when an AQ Assessment will be required
- Policy **AQ2**: States that the effect of development upon air quality is a material consideration – impacts on AQ will help determine if development is approved
- Policy **AQ3**: Specific to Crediton (AQMA)
- Policy **AQ4**: Specific to Cullompton (AQMA)
- Policy **AQ5**: Covers any new AQMAs that may be declared in Mid Devon – new development in these areas must conform to the same rules as in Policy AQ1 and AQ2

The SPD sets out the policy framework for air quality management, highlights the importance of including air quality as a material planning consideration, sets out when an air quality assessment will be required and outlines the process for completing these assessments, outlines the Council's approach to using planning conditions and S106 agreements for air quality and sets out location specific measures.

The criteria for when an AQ assessment would be required in support of a proposed development takes account of the following characteristics:

- The development type (i.e. retail, office, industry, residential);
- The site area (ha);
- The gross floor area (m<sup>2</sup>) or number of units;
- Whether the facility would require an environmental permit;

<sup>17</sup> Supplementary Planning Document on Air Quality and Development (2008), Mid Devon District Council. Available from: [https://laqm.defra.gov.uk/documents/Mid\\_Devon\\_SPD.pdf](https://laqm.defra.gov.uk/documents/Mid_Devon_SPD.pdf)

- The requirement for an increase in the number of parking places;
- Whether the proposal would significantly alter the composition of traffic, increase congestion or lower vehicle speeds;
- Whether the proposed development is in an area of exceedance / AQMA, or if members of the public are likely to be exposed for long periods; and
- If a development is likely to impact upon the measures set out in the AQAP.

The SPD also provides a detailed checklist of what elements would be expected in an AQIA and describes MDDC's expectations regarding consultation with the Council throughout the application process. Regarding the assessment of significance of air quality impacts, the SPD refers to guidance provided by the NSCA (Development Control: Planning for Air Quality 2006) and presents a decision tree used by the Council. This decision tree identifies four potential outcomes when assessing significance: 'AQ an overriding consideration'; 'AQ a high priority consideration'; 'AQ a medium priority consideration'; and 'AQ a low priority consideration'. These outcomes will influence the likelihood of a proposal being refused and indicate the mitigation measures to be applied.

Policy AQ3 requires "New development in or adjoining Crediton and other settlements identified in policy COR 17 of the LDF Core Strategy that would lead to an increase in traffic that will have a worsening effect on air quality will be required to provide for mitigation through contribution to implement the Air Quality Action Plan". The SPD goes on to present the recommended contributions to the AQAP, depending on the nature of the development, which should be adjusted according to inflation.

The SPD demonstrates a good example of the types of guidance that should be made available to developers to ensure air quality impacts are managed appropriately. The SPD also adopts a strategic approach to encourage the adoption of mitigation measures, on the basis of the scale and type of development. However, many of the reference documents have been superseded, and several authorities have released examples of SPD since its publication in 2009. Potential improvements

to MDDC's air quality developer guidance were identified in the review of MDDC's Air Quality Planning Policies conducted by Ricardo Energy & Environment in 2019.<sup>18</sup>

### ***Crediton Traffic Management Schemes***

The primary source of air pollution in Crediton is vehicles using the A377, for this reason an AQMA was designated. There were concerns that new development in the region would lead to further air quality issues in the High Street area. In response to this, a study was commissioned by Crediton Town Council to define traffic management improvements for key roads in this area along with wider public realm improvements. Air quality modelling was conducted for annual and hourly NO<sub>2</sub> means for a 2019 baseline and a future scenario to assess the impacts of the proposed improvements. There were two key outcomes from this exercise:

1. The annual mean model results showed a significant decrease in NO<sub>2</sub> concentrations along the High Street.
2. All hourly mean NO<sub>2</sub> concentrations were well below the one hour mean NO<sub>2</sub> AQO of 200 µg.m<sup>-3</sup>, not to be exceeded more than 18 times a year.

### ***Cullompton Low Emission Strategy***

A significant new development has been proposed for Cullompton, including an extension to the north and west of the town and a completely new 'Garden City' to the east of the M5. This new development has the potential to increase the risk of further air quality exceedance issues in and around the town, which is already designated as an AQMA for NO<sub>2</sub>. MDDC wished to explore the potential impact of these new developments on air quality in Cullompton and assess potential mitigation measures.

The LES presented a package of measures designed to achieve a long-term, sustainable transition to a low emission future for the District, reflecting the priority emission sources and key sensitivities, resulting in benefits for air quality and climate change. These strategies were designed to focus on transport related emissions, although also incorporate broader policy areas.

In summary, the LES found:

---

<sup>18</sup> Review of Mid Devon District Council's Air Quality Planning Policies, Ricardo Energy & Environment, June 2020



- The largest reductions in annual NO<sub>x</sub> emissions across all the measures resulted from the upgrade of the Council's vehicle fleet across the Low, Medium and High scenarios.
- A freight recognition scheme and an electric vehicle strategy resulted in the smallest NO<sub>x</sub> reductions.
- Economic analysis eluded to all five measures demonstrating net present values (NPVs) when emissions assessments was included.
- The most positive NPVs were seen for the Council fleet improvements and low emission taxi scheme.
- The most promising scenario for the LES was the Medium scenario for the measure "Improvements to the Council fleet and Staff Travel Strategy". The upgrades to the Council fleet under the Medium scenario would be relatively ambitious to complete in a short timescale, but doable as the vehicles identified are all due for replacement by the year 2022. In addition, the emissions savings for this measure were the greatest compared to the other measures.
- The ECO Stars® scheme was also considered to be a promising measure despite the emissions savings being relatively small compared to the other measures. This measure is projected to result in a decrease in NO<sub>2</sub> concentrations at diffusion tube locations in Cullompton.
- The low emission taxi programme would provide a chance for the Council to regulate taxis, but also to encourage transition to lower emission alternatives with incentives. This measure was projected to result in the second greatest reduction in emissions of NO<sub>x</sub>, after the upgrade of the Council fleet.
- The electric vehicle strategy showed relatively low reductions in emissions of all pollutants, despite the High scenario being very ambitious. Despite a seemingly low reduction in emissions of NO<sub>x</sub>, the associated impact on air quality was very positive; projected to achieve a reduction in NO<sub>2</sub> concentrations of approximately 5% at diffusion tubes in Cullompton under the Medium scenario.
- Finally, the clean air campaign was considered to be implementable under the Low scenario for Cullompton alone, although as a county-wide campaign could achieve greater levels of funding. Even under the Low scenario, the

reduction in NO<sub>x</sub> emissions is greater than for most other measures. This measure is likely to complement a number of the other proposed actions, for example the EV strategy and ECO Stars® scheme. Therefore, the clean air campaign should also be a priority for the Council.

DRAFT

## Source Apportionment

Source apportionment allows us to gain a better understanding of the different sources of emissions in Mid Devon. Source apportionment calculations have been completed for 2019 using a combination of local modelling outputs and Defra background concentration maps at 15 monitoring locations across Crediton and Cullompton. For the nine monitoring locations (DT1, DT2, DT3, DT4, DT5, DT6, DT15, DT16 and DT17) where local modelling data was not available, a simplified source apportionment was performed based solely on the Defra background maps. The following sections cover in detail, any locations where either modelled or measured pollutant concentrations either exceed or fall within +/- 10% of the national objective. Figure 1 shows the locations where the detailed (local modelling and background map) and simple (background map) source apportionment was completed; these include the locations of the four AQMesh monitors deployed in the Crediton and Cullompton AQMAs.

**Figure 1 – Monitoring locations across MDDC, including the Crediton and Cullompton AQMAs**



© OpenStreetMap contributors

## Required Reduction in Emissions

The source apportionment identified three locations where the NO<sub>2</sub> national objective was either exceeded or at risk of being exceeded, these locations were DT12 (8 Fore Street, Cullompton), DT20 (Duke of York, High Street, Crediton) and the AQMesh Little Bakery site in Cullompton.

The measured NO<sub>2</sub> concentration reported in the 2020 ASR (37.8 µg.m<sup>-3</sup>) was within 10% of the NAQO at DT12. NO<sub>2</sub> concentrations at DT20 were also within 10% of the NO<sub>2</sub> objective for both the modelled (38.2 µg.m<sup>-3</sup>) and measured (37.9 µg.m<sup>-3</sup>) data.

The AQMesh Little Bakery site has been chosen due to a measured period mean NO<sub>2</sub> concentration of 65.7 µg.m<sup>-3</sup>. In the case of the Little Bakery site, it is important to note that the period mean is representative of October 2019 and March 2020 and not a full year. This is because the AQMesh monitoring sites were installed in October 2019 and the national lockdown caused by the COVID-19 pandemic resulted in an abnormal reduction in travel from March 2020.

It is important to note that the uncertainties of air quality measurements using sensor technology is not to the same standard as conventional measurement systems. At this moment, there are no accepted standard methods or technical specifications to quantify the performance or measurement uncertainty of these sensor systems. Ricardo Energy & Environment was commissioned to install these monitors. Ricardo is heavily involved in the development of these standards in a European Working Group and uses the agreed best practices from the Group in the operation of its sensor systems in the UK. With these quality control procedures in place, we estimate measurement uncertainty to be in the region of ±30% for NO<sub>2</sub> and PM. Limits of detection are in the region of 10 ppbv for NO<sub>2</sub> and 10 µg.m<sup>-3</sup> for PM.

All three locations have been used to determine the required NO<sub>x</sub> emissions reductions from road transport. The reductions in NO<sub>x</sub> concentrations required to meet the NO<sub>2</sub> objective of 40 µg.m<sup>-3</sup> have been calculated using monitoring data from the three locations, in accordance with Section 7.86 (and Box 7.6) of the Technical Guidance LAQM (TG16). The required NO<sub>x</sub> reductions from road traffic to achieve compliance at these three locations are presented in Table 2. Table 3 presents the required NO<sub>x</sub> reductions from road traffic to achieve 10% below compliance at the same locations.

The same methodology has been applied as a result of the PM<sub>10</sub> national objective being exceeded at the AQMesh Church site in Crediton. Again, this is representative of a precautionary approach as monitoring data was restricted to between October 2019 and March 2020.

**Table 2 – Nitrogen dioxide concentrations measured at locations with exceedances and the required reduction in NO<sub>x</sub> emissions from road traffic to achieve compliance**

Site name	NO <sub>2</sub> measured at sampling site, 2019, µg.m <sup>-3</sup>	NO <sub>x</sub> background, µg.m <sup>-3</sup>	Roadside NO <sub>x</sub> from NO <sub>2</sub> calculator, µg.m <sup>-3</sup>	Road NO <sub>x</sub> to achieve compliance, µg.m <sup>-3</sup>	Road NO <sub>x</sub> reduction required, µg.m <sup>-3</sup>	Percentage road NO <sub>x</sub> reduction, %
DT12	37.8	6.1	66.5	71.6	N/A	N/A
DT20	37.9	6.0	66.9	71.8	N/A	N/A
AQMesh Little Bakery	65.7	6.3	138.9	71.4	67.5	48.6

**Table 3 – Nitrogen dioxide concentrations measured at locations with exceedances and the required reduction in NO<sub>x</sub> emissions from road traffic to achieve 10% below compliance**

Site name	NO <sub>2</sub> measured at sampling site, 2019, µg.m <sup>-3</sup>	NO <sub>x</sub> background, µg.m <sup>-3</sup>	Roadside NO <sub>x</sub> from NO <sub>2</sub> calculator, µg.m <sup>-3</sup>	Road NO <sub>x</sub> to achieve 10% below compliance, µg.m <sup>-3</sup>	Road NO <sub>x</sub> reduction required, µg.m <sup>-3</sup>	Percentage road NO <sub>x</sub> reduction, %
DT12	37.8	6.1	66.5	62.4	4.1	6.2
DT20	37.9	6.0	66.9	62.5	4.4	6.6
AQMesh Little Bakery	65.7	6.3	138.9	62.1	76.8	55.3

Table C. 1, Table C. 2 and Table C. 3 in Appendix C: Source Apportionment present the source apportionment in terms of percentage contribution of the major vehicle types to the total NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions respectively. These tables can be visualised in Figure 2 to 4. Similarly, Table 6, Table 7 and Table 8 show the source apportionment in terms of the absolute modelled concentrations (in µg.m<sup>-3</sup>) originating from these sources. It is important to note that there are expected differences between the road NO<sub>x</sub> absolute concentrations calculated through modelling and the road NO<sub>x</sub> absolute values calculated using the monitored values and the NO<sub>x</sub> to NO<sub>2</sub> calculator in Table 2 and Table 3. In order to determine the absolute NO<sub>x</sub> concentration values based on the measured data Table 4 applies the

percentage breakdown of major vehicle types given in Appendix C to the measured road NO<sub>x</sub>.

**Table 4 – NO<sub>x</sub> concentrations for major vehicle types, calculated using measured road NO<sub>x</sub> concentrations (derived from NO<sub>x</sub> to NO<sub>2</sub> calculator)**

Site name	Roadside NO <sub>x</sub> from NO <sub>2</sub> calculator	Petrol car	Diesel car	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles
DT12	66.5	3.5	29.5	4.4	18.6	7.5	2.9	0.1
DT20	66.9	2.4	32.4	8.3	17.3	4.9	1.5	0.1
AQMesh Little Bakery	138.9	7.4	61.6	9.1	38.9	15.6	6.3	0.2

At the road adjacent to AQMesh Little Bakery, diesel cars and LGVs represent the largest contribution of NO<sub>x</sub> emissions representing 39.4% and 24.9% of all NO<sub>x</sub> emissions respectively. Applying these percentages to the measured road NO<sub>x</sub> concentrations, these two vehicle types would account for 100.5 µg.m<sup>-3</sup> of NO<sub>x</sub> emissions. In order for NO<sub>2</sub> concentrations to be reduced to be in line with the national objective, a 67.5 µg.m<sup>-3</sup> reduction in road NO<sub>x</sub> is needed. Implementing a blend of measures which focus on a reduction of emissions in these two vehicle types will lead to the national objectives being met. Similarly, to reduce NO<sub>2</sub> concentrations to be 10% below the national objective a reduction of 76.8 µg.m<sup>-3</sup> road NO<sub>x</sub> would be needed, again this can be achieved by reducing emissions in these two vehicle categories.

The road adjacent to DT12 contributes 66.5 µg.m<sup>-3</sup> of road NO<sub>x</sub>, 44.4% of this is assigned to diesel cars, whilst a further 30.0% comes from LGVs. Applying these percentages to the measured NO<sub>x</sub> concentrations, these two vehicle types account for 29.5 µg.m<sup>-3</sup> and 18.6 µg.m<sup>-3</sup>. Since the NO<sub>2</sub> concentrations at DT12 are below the NO<sub>2</sub> national objective, we have calculated the reduction needed to be below the national objective by more than 10% (> 36 µg.m<sup>-3</sup>). In this case a reduction of 4.1 µg.m<sup>-3</sup> of road NO<sub>x</sub> concentrations would be needed and both Diesel and LGV vehicle types provide ample opportunity to reduce the necessary NO<sub>x</sub> concentrations.

Finally, the NO<sub>2</sub> concentration at DT20 is below the NO<sub>2</sub> national objective and therefore the necessary reduction in road NO<sub>x</sub> to achieve a NO<sub>2</sub> concentration below 36 µg.m<sup>-3</sup> will be identified. Similar to DT12, the largest contribution to road NO<sub>x</sub> was

assigned as diesel cars and LGVs, contributing 48.4% and 25.8% respectively. Through application of these percentage contributions to the measured road NO<sub>x</sub>, an absolute NO<sub>x</sub> concentration value of 32.4 µg.m<sup>-3</sup> for diesel cars and 17.3 µg.m<sup>-3</sup> for LGVs was calculated. Therefore, a reduction in road NO<sub>x</sub> of 4.4 µg.m<sup>-3</sup> is required to achieve the required reduction to bring NO<sub>2</sub> concentrations below the national objective. As diesel cars represent almost 50% of the road NO<sub>x</sub> contributions, this vehicle type provides the best opportunity to reduce concentrations at this receptor.

Table 5 presents the measured PM<sub>10</sub> concentrations apportioned into the major road transport types using the percentage breakdown of these road transport types in Table C. 2. To achieve concentrations that comply with the PM<sub>10</sub> national objective, a reduction of 3.2 µg.m<sup>-3</sup> would be required. The largest PM<sub>10</sub> road contributions come from diesel cars (32.2%), petrol cars (24.9%) and LGVs (21.5%), representing PM<sub>10</sub> concentrations of 2.9 µg.m<sup>-3</sup> and 2.2 µg.m<sup>-3</sup> and 1.9 µg.m<sup>-3</sup> respectively. Measures for reducing PM<sub>10</sub> concentrations should therefore be focused on these three categories. To achieve PM<sub>10</sub> concentrations which fall below 10% of the national objective a reduction of 7.2 µg.m<sup>-3</sup> is required. In this case measures may also have to be extended to include buses.

**Table 5 – Contribution of PM<sub>10</sub> concentrations from major vehicle types, calculated using measured road PM<sub>10</sub> concentrations**

Site name	Measured roadside PM <sub>10</sub> (µg.m <sup>-3</sup> )	Contribution to measured roadside PM <sub>10</sub> (µg.m <sup>-3</sup> )						
		Petrol car	Diesel car	Buses	LGVs	rHGVs	aHGVs	Motorcycles
<b>AQMesh Church</b>	43.2	2.2	2.9	0.9	1.9	0.6	0.3	< 0.1

Figure 2 – Stacked bar chart showing NOx source apportionment for all road transport and background for monitoring locations within MDDC (%), for the baseline fleet, 2019

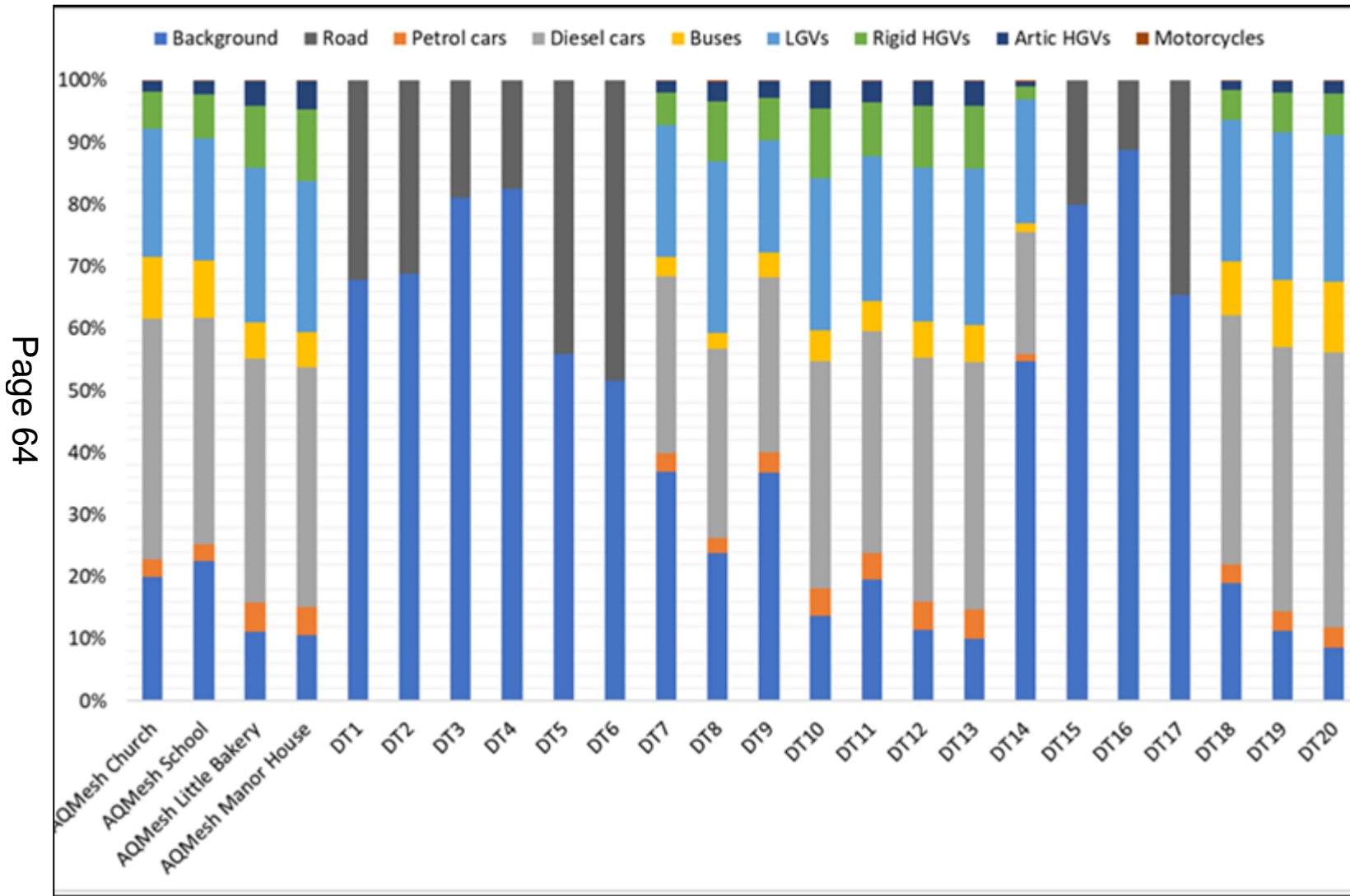


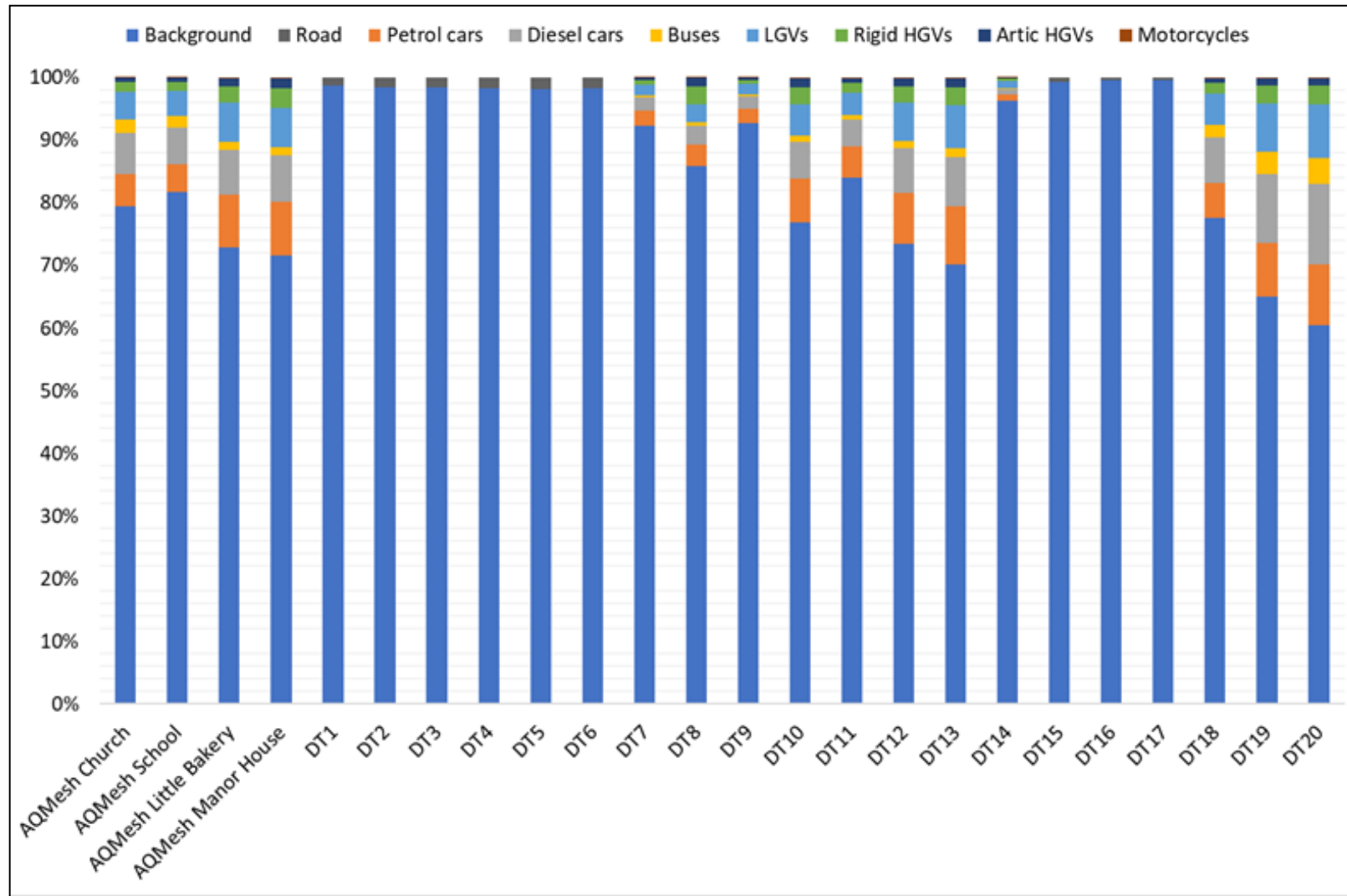


Table 6 – NOx source apportionment by background and vehicle type (road transport emissions from major roads) at monitoring locations within MDDC ( $\mu\text{g.m}^{-3}$ ) for the baseline fleet, 2019 (NO<sub>2</sub> concentrations derived from the NOx to NO<sub>2</sub> calculator)

Site name	Modelled background NOx concentration ( $\mu\text{g.m}^{-3}$ )	Modelled road transport NOx concentration ( $\mu\text{g.m}^{-3}$ ) broken down by vehicle type							Total modelled NOx concentration ( $\mu\text{g.m}^{-3}$ )	Total modelled NO <sub>2</sub> concentration ( $\mu\text{g.m}^{-3}$ )	Total measured NO <sub>2</sub> concentration ( $\mu\text{g.m}^{-3}$ )
		Petrol cars	Diesel cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles			
AQMesh Church <sup>19</sup>	6.6	0.9	12.7	3.3	6.8	1.9	0.6	< 0.1	32.9	19.2	35.3
AQMesh School	6.8	0.8	11.0	2.8	6.0	2.1	0.7	< 0.1	30.3	17.9	24.7
AQMesh Little Bakery	6.0	2.5	21.2	3.1	13.4	5.4	2.1	0.1	53.8	31.21	<b>65.7</b>
AQMesh Manor House	6.1	2.6	22.3	3.3	14.1	6.7	2.6	0.1	57.8	29.37	34.3
DT1	5.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.4	N/A	9.9
DT2	6.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10	N/A	8.7
DT3	7.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.5	N/A	17.2
DT4	11.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13.5	N/A	27.0
DT5	8.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15.2	N/A	22.6
DT6	6.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.8	N/A	20.3
DT7	5.7	0.5	4.4	0.5	3.3	0.8	0.3	< 0.1	15.4	9.91	12.9
DT8	6.3	0.6	8.0	0.7	7.3	2.5	0.8	0.1	26.3	15.77	15.6
DT9	6.1	0.6	4.7	0.7	3.0	1.1	0.4	< 0.1	16.6	10.56	9.9
DT10	6.3	2.0	16.7	2.2	11.2	5.1	2.0	0.1	45.5	25.46	24.8
DT11	6.1	1.3	11.1	1.5	7.3	2.7	1.0	< 0.1	31.0	18.23	32.4
DT12	6.1	2.5	20.9	3.1	13.2	5.3	2.1	0.1	53.2	29.08	<b>37.8</b>
DT13	6.0	2.9	24.1	3.6	15.2	6.1	2.4	0.1	60.4	32.42	33.9
DT14	5.6	0.1	2.0	0.2	2.0	0.2	0.1	< 0.1	10.3	7.1	15.9
DT15	5.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.4	N/A	28.9
DT16	5.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.3	N/A	34.8
DT17	6.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.9	N/A	32.7
DT18	6.7	1.0	14.1	3.0	8.0	1.7	0.5	< 0.1	35.1	20.3	27.7
DT19	6.9	1.9	25.9	6.6	14.5	3.9	1.2	0.1	61.0	32.7	33.1
DT20	6.3	2.4	32.5	8.4	17.3	4.9	1.5	0.1	73.4	<b>38.2</b>	<b>37.9</b>

<sup>19</sup> Total measured NO<sub>2</sub> for both the AQMesh sites are based on the average from October 2019 to March 2020. This is because the AQMesh sites were only installed in October 2019 and the COVID-19 pandemic starting in March causing travel to be restricted to atypical levels.

Figure 3 – Stacked bar chart showing PM<sub>10</sub> source apportionment by background and vehicle type (road transport emissions from major roads) for monitoring locations within MDDC (%), for the baseline fleet, 2019



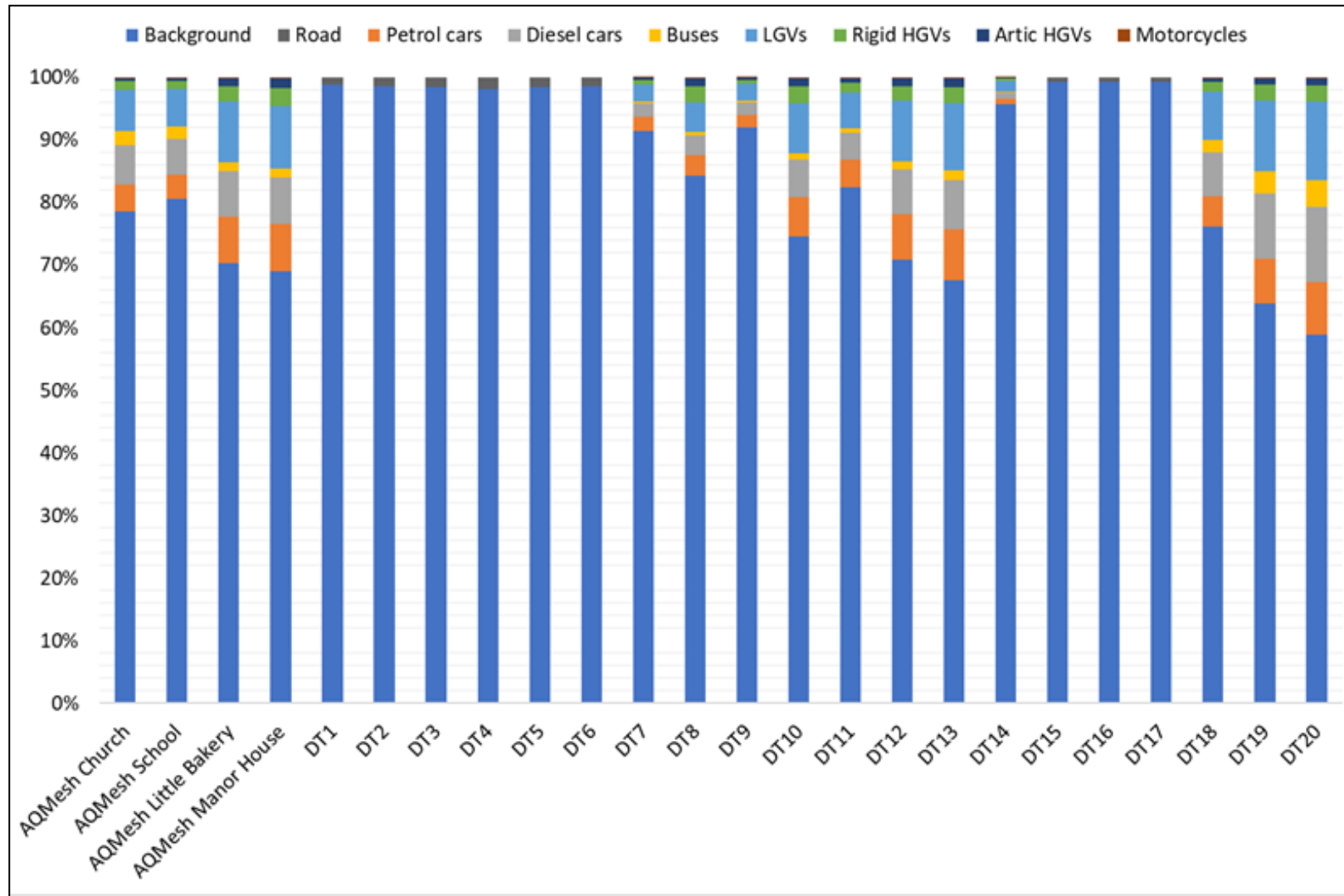
**Table 7 – PM<sub>10</sub> source apportionment by background and vehicle type (road transport emissions from major roads) at monitoring locations within MDDC (µg.m<sup>-3</sup>) for the baseline fleet, 2019**

Site name	Modelled background PM <sub>10</sub> concentration (µg.m <sup>-3</sup> )	Modelled road transport PM <sub>10</sub> concentration (µg.m <sup>-3</sup> ) broken down by vehicle type							Total modelled PM <sub>10</sub> concentration (µg.m <sup>-3</sup> )	Total measured PM <sub>10</sub> <sup>20</sup> concentration (µg.m <sup>-3</sup> )
		Petrol cars	Diesel cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles		
AQMesh Church <sup>21</sup>	9.9	0.6	0.8	0.3	0.6	0.2	0.1	< 0.1	12.5	<b>43.2</b>
AQMesh School	9.9	0.5	0.7	0.2	0.5	0.2	0.1	< 0.1	12.1	24.2
AQMesh Little Bakery	12.1	1.4	1.2	0.2	1.0	0.4	0.2	< 0.1	16.6	26.3
AQMesh Manor House	12.2	1.5	1.3	0.2	1.1	0.5	0.3	< 0.1	17.1	29.0
DT1	10.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.3	N/A
DT2	10.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.5	N/A
DT3	10.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.5	N/A
DT4	10.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.9	N/A
DT5	12.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.5	N/A
DT6	11.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.1	N/A
DT7	12.0	0.3	0.3	< 0.1	0.2	0.1	< 0.1	< 0.1	13.0	N/A
DT8	11.4	0.5	0.4	0.1	0.4	0.4	0.2	< 0.1	13.3	N/A
DT9	11.2	0.3	0.2	< 0.1	0.2	0.1	< 0.1	< 0.1	12.0	N/A
DT10	12.6	1.2	1.0	0.2	0.8	0.5	0.2	< 0.1	16.4	N/A
DT11	12.3	0.7	0.6	0.1	0.5	0.2	0.1	< 0.1	14.6	N/A
DT12	12.2	1.4	1.2	0.2	1.0	0.4	0.2	< 0.1	16.6	N/A
DT13	12.1	1.6	1.4	0.2	1.2	0.5	0.2	< 0.1	17.2	N/A
DT14	11.6	0.1	0.1	< 0.1	0.1	< 0.1	< 0.1	< 0.1	12.1	N/A
DT15	9.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.9	N/A
DT16	9.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.5	N/A
DT17	10.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.2	N/A
DT18	9.9	0.7	0.9	0.3	0.6	0.2	0.1	< 0.1	12.7	N/A
DT19	9.9	1.3	1.7	0.5	1.2	0.4	0.2	< 0.1	15.3	N/A
DT20	9.9	1.6	2.1	0.7	1.4	0.5	0.2	< 0.1	16.4	N/A

<sup>20</sup> Only the AQMesh sites monitor PM

<sup>21</sup> Total measured NO<sub>2</sub> for both the AQMesh sites are based on the average from October 2019 to March 2020. This is because the AQMesh sites were only installed in October 2019 and the Covid-19 pandemic starting in March meant travel was restricted to non-normal levels.

Figure 4 – Stacked bar chart showing PM<sub>2.5</sub> source apportionment by background and vehicle type (road transport emissions from major roads) for each monitoring location within MDDC (%), for the baseline fleet, 2019



**Table 8 – PM<sub>2.5</sub> source apportionment by background and vehicle type (road transport emissions from major roads) at all monitoring locations within MDDC (µg.m<sup>-3</sup>) for the baseline fleet, 2019**

Site name	Modelled background PM <sub>2.5</sub> concentration (µg.m <sup>-3</sup> )	Modelled road transport PM <sub>2.5</sub> concentration (µg.m <sup>-3</sup> ) broken down by vehicle type							Total modelled PM <sub>2.5</sub> concentration (µg.m <sup>-3</sup> )	Total measured PM <sub>2.5</sub> <sup>22</sup> concentration (µg.m <sup>-3</sup> )
		Petrol cars	Diesel cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles		
AQMesh Church <sup>23</sup>	6.2	0.3	0.5	0.2	0.5	0.1	< 0.1	< 0.1	7.9	7.2
AQMesh School	6.2	0.3	0.4	0.1	0.5	0.1	< 0.1	< 0.1	7.6	5.7
AQMesh Little Bakery	7.1	0.7	0.7	0.1	1.0	0.2	0.1	< 0.1	10.1	8.6
AQMesh Manor House	7.1	0.8	0.8	0.1	1.0	0.3	0.2	< 0.1	10.3	10.4
DT1	6.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.3	N/A
DT2	6.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.5	N/A
DT3	6.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.8	N/A
DT4	7.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.1	N/A
DT7	7.0	0.2	0.2	< 0.1	0.2	0.1	< 0.1	< 0.1	7.7	N/A
DT8	6.7	0.3	0.3	< 0.1	0.4	0.2	0.1	< 0.1	8.0	N/A
DT9	6.6	0.1	0.1	< 0.1	0.2	< 0.1	< 0.1	< 0.1	7.2	N/A
DT10	7.3	0.6	0.6	0.1	0.8	0.3	0.1	< 0.1	9.8	N/A
DT11	7.2	0.4	0.4	0.1	0.5	0.1	0.1	< 0.1	8.7	N/A
DT12	7.1	0.7	0.7	0.1	1.0	0.2	0.1	< 0.1	10.1	N/A
DT13	7.1	0.8	0.8	0.2	1.1	0.3	0.1	< 0.1	10.5	N/A
DT14	6.8	0.1	0.1	< 0.1	0.1	< 0.1	< 0.1	< 0.1	7.1	N/A
DT15	5.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.8	N/A
DT16	5.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.9	N/A
DT17	5.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.9	N/A
DT18	6.1	0.4	0.6	0.2	0.6	0.1	0.1	< 0.1	8.0	N/A
DT19	6.3	0.7	1.0	0.4	1.1	0.2	0.1	< 0.1	<b>9.8</b>	N/A
DT20	6.2	0.9	1.3	0.4	1.3	0.3	0.1	< 0.1	10.5	N/A

<sup>22</sup> Only the AQMesh sites monitor PM

<sup>23</sup> Total measured NO<sub>2</sub> for both the AQMesh sites are based on the average from October 2019 to March 2020. This is because the AQMesh sites were only installed in October 2019 and the Covid-19 pandemic starting in March meant travel was restricted to non-normal levels.

## Key Priorities

MDDC's key priority is to protect its citizens from the harmful impacts of poor air quality and the Council is therefore committed to reducing concentrations of NO<sub>2</sub> to within legal limits and beyond, in all areas of the district where the population is at risk to exposure. Alongside this objective, MDDC are also committing to reducing levels of all pollutants in ambient air, with a particular focus on PM<sub>2.5</sub>.

As discussed in the Source Apportionment section, the primary cause of air pollution in the city is vehicle emissions. A closer look at the vehicle mix tells us that diesel cars and LGVs are responsible for the greatest proportion of emissions along most roads where exceedances of the air quality objective are occurring, or are likely to occur. MDDC have shown progress in developing measures to tackle these sources. The Crediton Traffic Management Schemes aims to define traffic management improvements for key roads within Crediton. Whilst the Cullompton Low Emission Strategy presents a study of the potential impacts of a new development and possible mitigation measures to reduce the air quality impact.

Despite compliance in all NO<sub>2</sub> diffusion tube monitoring locations, it is imperative that MDDC continue to address air pollution within the city to ensure that locations within 10% of compliance do not exceed in the following years. Continued progress throughout MDDC is recommended alongside the following key priorities for the AQAP:

- **Priority 1 – Tackling NO<sub>2</sub> hotspots**

The measures under Priority 1 have been designed to address specific areas of NO<sub>2</sub> exceedance across Mid Devon. The modelling conducted along with the measured monitoring data confirms the presence of NO<sub>2</sub> hotspots within MDDC. Source apportionment modelling shows the cause of this is road transport, specifically diesel cars and LGVs.

- **Priority 2 – Improving the overall air quality across Mid Devon**

MDDC recognise that the AQAP needs to both introduce measures that reduce pollution levels in specific areas to ensure national objectives are met and provide a broader strategy which aims to achieve continued improvement in air quality beyond the objectives. Priority 2 will introduce a broader range of measures designed to achieve emission reductions across the region, which both

supplement the measures under Priority 1 and widen the coverage of the air quality benefits.

- **Priority 3 – Managing PM<sub>2.5</sub> exposure**

Recent scientific research has shown that prolonged exposure to particulate matter smaller than 2.5 µm in diameter can lead to cardiopulmonary related diseases. The World Health Organisation (WHO) has recommended that national governments work towards achieving concentrations of 10 µg.m<sup>-3</sup> for PM<sub>2.5</sub> in ambient air. The UK government has stated in its recent Clean Air Strategy that it intends to “*examine what action will be needed to meet this limit*” and halve the number of UK residents currently exposed to levels above this threshold by 2025.

MDDC has made it a priority to be proactive in its role to protect its citizens from the effects of poor air quality and recognises the long-term cost-benefits of taking action now. MDDC are therefore looking at steps that can reduce levels of PM<sub>2.5</sub> and will consider revising both the cities wood burning and urban planning policy to reduce the contribution of major PM<sub>2.5</sub> pollutant sources.

## Development and Implementation of Mid Devon District Council's AQAP

### Consultation and Stakeholder Engagement

In developing/updating this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 9.

On 2<sup>nd</sup> June 2021, a Stakeholder Engagement Workshop was held to discuss the measures included in the draft AQAP, online via Microsoft Teams. Prior to the workshop, participants were asked to complete a multi-criteria analysis (MCA) exercise – the findings of which are presented in Appendix A.

**Table 9 – Consultation Undertaken**

Yes/No	Consultee
Yes	the Secretary of State
Yes	the Environment Agency
Yes	the highways authority
Yes	all neighbouring local authorities
Yes	other public authorities as appropriate, such as Public Health officials
Yes	bodies representing local business interests and other organisations as appropriate

### Steering Group

An Action Plan Steering Group was established in early 2021 (chaired by Simon Newcombe, Corporate Manager for Public Health and Regulatory Services). Members of the Steering Group included:

- Cllr Dennis Knowles (Cabinet Member for Community Wellbeing, Tiverton)
- Joy Norris (Town Clerk, Cullompton Town Council)
- Poie Li (Principal Forward Planning Officer, MDDC)
- Rachel Avery (Town Clerk, Crediton Town Council)
- Stuart Jarvis (Principal Transport Planning Officer, Devon County Council)
- Tanya Wenham (Operations Manager, MDDC)



- Tom Keating (Lead Licensing Officer, MDDC)
- Cllr John Downes (Crediton Town Council, Environment Policy Development Group, Waste Management Efficiency Committee, Planning Committee, MDDC)
- Jason Ball (Climate and Sustainability Specialist, MDDC)

### **AQAP Measures**

**Error! Reference source not found.** provides a detailed description of each potential measure to be included in the AQAP. These measures were discussed at the Stakeholder Consultation Workshop, before being refined based on the steering group's feedback.

Table 10 shows the Mid Devon District Council's AQAP measures, which were agreed through consultation with the Steering Group. A preliminary longlist of measures was developed for discussion with the Steering Group, as presented in Appendix D. A prioritised list of actions was identified through a process of Multi-Criteria Analysis (MCA), which considered the impact on emissions, the potential for wider benefits, the burden on residents and local businesses, and the costs and risks associated with implementation.

The finalised list of actions is presented below, and contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

Updates on the implementation and progress of these measures will be presented in Mid Devon's Annual Status Reports.

Table 10 – Air Quality Action Plan Measures

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
1	Mid Devon Clean Air Campaign	Public Information, Promoting Travel Alternatives, Vehicle Fleet Efficiency, Traffic Management, Alternatives to private vehicle use	Via other mechanisms, Intensive active travel campaign & infrastructure, Promotion of cycling, Promotion of walking, School Travel Plans, Driver training and ECO driving aids, Fleet efficiency and recognition schemes, Anti-idling enforcement, Car & lift sharing schemes	MDDC	2021/2022	1-5 years	Uptake in community action and air quality awareness. Possibility of using surveys to measure awareness and knowledge base.	Medium	A number of themes were identified during stakeholder consultation for the AQAP that would fit well into an overarching clean air campaign for Mid Devon.	Will be an ongoing campaign.	Clean air campaign to cover themes including: <ul style="list-style-type: none"> <li>Local air quality data</li> <li>Open burning – domestic, solid fuel &amp; bonfires</li> <li>Electric vehicles and other low emission vehicles</li> <li>Active travel – cycling facilities, footpath network, cycle routes, green travel routes</li> <li>Fleet management / recognition schemes – for businesses and especially freight businesses</li> <li>Anti-idling – targeting areas including schools, health centres and hospitals</li> <li>Mode shift – car sharing, public transport, active travel</li> <li>School engagement – school streets, air quality projects and data</li> </ul>
2	Develop a priority matrix of low emission vehicle options for MDDC's vehicle fleet	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles, Public Vehicle Procurement - Prioritising	MDDC	2021/22	2021/22	Completion of matrix.	Low	An example matrix was prepared in order to complete modelling for the Cullompton LES.	2021/22, but will be updated as fleet is upgraded.	The example matrix used for air quality and emissions modelling as part of the Cullompton LES could be used as a basis for this measure.

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
			uptake of low emission vehicles								
3	Upgrade MDDC vehicle fleet	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles, Public Vehicle Procurement - Prioritising uptake of low emission vehicles	MDDC	2021/22	1-5 years	Replacement of vehicles in MDDC fleet.	Medium	The oldest / most polluting vehicles were identified during modelling for the Cullompton LES.	2027, but ongoing as the fleet is upgraded.	
4	MDDC Environmental Workplace & Travel Strategy	Promoting Travel Alternatives	Encourage / Facilitate home-working, Workplace travel planning	MDDC	2021/22	2021/22	Change in staff journeys made by private vehicle – this could be assessed via surveys.	Medium	Work has begun on a revised workplace strategy.	2021/22, but ongoing.	Environmental Workplace & Travel Strategy to reflect the change in working patterns post-Covid, and link in to MDDC Climate Strategy <sup>24</sup> / carbon neutral target. Could include, for example: <ul style="list-style-type: none"> <li>• Smart offices</li> <li>• Hybrid working</li> <li>• E-bikes</li> <li>• EV charging</li> <li>• Travel vouchers / discounts</li> <li>• Staff car share scheme</li> </ul>
5	Low Emission Taxi Programme	Promoting Low Emission Transport	Taxi emission incentives	MDDC	2021/22	1-5 years	Number / proportion of EV vehicles in taxi fleet.	Medium		2021/22, but ongoing.	Incentives for low emission taxis might include: <ul style="list-style-type: none"> <li>• Tax incentives</li> <li>• Support to upgrade vehicles</li> <li>• Priority taxi ranks</li> </ul>

<sup>24</sup> Mid Devon District Council's Climate strategy & handbook 2020-2024, MDDC, 2020

## Mid Devon District Council AQAP

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
											<ul style="list-style-type: none"> <li>Discounted / free EV charging</li> </ul>
6	Upgrade / retrofit buses	Vehicle Fleet Efficiency	Vehicle Retrofitting programmes	MDDC to partner with bus companies	2021/22	1-5 years	Number / proportion of upgraded / retrofitted vehicles in bus fleet.	Medium		2025	
7	Develop a domestic solid fuel policy	Policy Guidance and Development Control	Other policy	MDDC	2021/22	2021/22	Publication of the policy. Enforcement of the policy.	Medium		2021/22	
8	Develop a bonfire policy	Policy Guidance and Development Control	Other policy	MDDC	2021/22	2021/22	Publication of the policy. Enforcement of the policy. Reduction in nuisance reports.	Medium		2021/22	
9	Electric Vehicle Strategy	Promoting Low Emission Transport, Traffic Management	Priority parking for LEV's, Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging, Emission based parking or permit charges, Strategic highway improvements, Re-prioritising road space away from cars, inc Access	MDDC & DCC	2021/22	1-5 years	Number of new EV charging points installed across the district.	High	Options for the procurement of electric car charging units have been identified in a report, including approx. 15 locations, and three types of chargers.	2025	It is important to continue to work with neighbouring authorities to facilitate additional electric car charging points across the District. A delegated authority may be set up to enable capital funding opportunities to be secured.

## Mid Devon District Council AQAP

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
			management, Selective vehicle priority, bus priority, high vehicle occupancy lane								
10	Consider implementation of smoke control areas	Policy Guidance and Development Control	Other Policy	MDDC	2021/22	2022/23	Implementation of smoke control area(s)	High	Feasibility is under consideration.	2022/23	Needs careful consideration, as SCAs are managed at a national government level.
11	Real time sensor AQ monitoring at new locations in Crediton & Cullompton	Public information	Via other mechanisms	MDDC	2018/19	2019/20	Installation of real time AQ monitoring	Low	Four real-time air quality (AQMesh) sensors were installed by Ricardo at locations across the district.	Completed	The sensor outputs are: NO <sub>2</sub> (hourly mean), PM <sub>10</sub> (24 Hour mean), PM <sub>2.5</sub> (24 Hour mean), NO (hourly mean) and NO <sub>x</sub> as NO <sub>2</sub> (hourly mean). Data is available to download from Air Quality England (AQE).
12	Updating the Supplementary Planning Document (SPD) on Air Quality and Development	Policy guidance and development control	Air Quality Planning and Policy Guidance	MDDC	2019/20	2021	Publication of an updated SPD	Low	The update to the SPD is underway and is expected to be completed by Summer 2020.	2021	The SPD on Air Quality and Development was extensively reviewed as part of the Ricardo report "Review of Mid Devon District Council's Air Quality Planning Policies" and a number of improvements were suggested.
13	Planning conditions on Tiverton Eastern Urban extension	Policy guidance and development control	Air Quality Planning and Policy Guidance	MDDC	2017/2018		Air Quality Noise Emissions	NA	Update requested from Area Planning officer.	Ongoing	Masterplan for a large urban development was accepted in June 2018. MDC now needs to ensure that all phased planning applications are considered with respect to the Mid Devon Core Strategy and SPDs.

Mid Devon District Council AQAP

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
14	Eastern Relief Road Cullompton and additional M5 junction	Traffic Management	Strategic highway improvements	MDDC / DCC / Highways	2017/2018		% reduction in traffic flows through Cullompton Reduction in congestion on minor roads	High	Local Plan submission. Land allocated, and preliminary design work undertaken. Major infrastructure funding required.	Pending funding and adoption of Local Plan	Major infrastructure funding required
15	Kings Mill Industrial site traffic management Cullompton Junction 28	Traffic Management	Anti-idling enforcement and illegal parking	MDDC / DCC / Highways	2017/2018		Improved traffic flows to/from industrial site	Low	Local Plan submission proposes a number of solutions	Ongoing	The new Local Plan proposes upgrades to the existing road network to support growth of industrial estate and reduce congestion. As the site will increase in size, thus increasing volumes trying to leave/enter the M5, a range of initiatives are proposed to deal with the problem.
16	Culm Valley Garden Village development and major infrastructure projects	Policy guidance and development control	Air Quality Planning and Policy Guidance	MDDC / DCC / Highways	2017-21		Public Health considerations incorporated in Master planning cycle	High	Culm Village funding awarded by Central Government Steering group formed. Site and land secured.	Ongoing	The 500 home 'garden village' aims to support housing demand in the region with high quality design. This includes planning policies which support improvements to local air quality levels including technical guidance on emissions assessment work and low emission strategies.
17	Secure cycle parking facilities in town Centres	Promoting Travel Alternatives	Promotion of cycling	MDDC, Network Rail, DCC	2018/2019		Initial facility installed in Crediton	Low	s106 allocated for Crediton	Pending release of s106 funds	Locations and s106 funding have been identified in Crediton, and Cullompton. Locations in Tiverton are

## Mid Devon District Council AQAP

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
	and at key transport hubs								railway station and Town centre. Included in Cullompton Master planning.		under consideration to join the town centre with Tiverton parkway railway station.
18	Bus stop infrastructure	Transport Planning and Infrastructure	Vehicle	MDDC / DCC	2017/2018		Change to mode of transport Increase in patronage	Medium	S105a and S106 contribution allocated.	Pending full release of funds	Plans are already in place to use S105a contributions to improve bus stop infrastructure. S106 allocations are in place for Copplestone bus infrastructure improvements that affect Crediton AQMA.
19	Review of bus stop locations and routes	Transport Planning and Infrastructure	Public transport improvements- interchanges- stations and services	MDDC / DCC	2017/2018	2020/21	Improved traffic flow through centre of towns	Low	Town Council consultation. Pending agreement with DCC and Bus operators.	2021	Pending agreement with DCC and Bus operators District wide. Review of Cullompton and Crediton services will include frequency, location of bus stops, routes.
20	Improving footpath and cycling paths in major towns	Transport Planning and Infrastructure	Cycle and walking network	Town Councils / MDDC / DCC	2017/2018		Connected pathway network Improved accessibility Reduction in short car journeys	Low	Initial network improvements identified in Neighbourhood plans and s106 projects.	Ongoing	Some areas that have been identified are: improved footpath and cycleway links between Cullompton town centre and Kingsmill Industrial Estate, and Cromwells Meadow to Leisure centre in Crediton.
21	Road resurfacing	Transport Planning and Infrastructure	Other	DCC / Highways	2018/2019		Areas of existing or new road network resurfaced	Low	Review phase.	Ongoing	Consideration given to lower polluting road surfacing within AQMA areas as opportunities arise. There is potential for this to be managed on a contract by contract basis.

## Mid Devon District Council AQAP

Measure no.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMAs	Progress to Date	Estimated Completion Date	Comments
22	Community car sharing schemes	Alternatives to private vehicle use	Car and lift sharing schemes	MDDC	2017/2018		Number of car share schemes delivered in new developments Usage rate	Low	s106 contribution allocated and included in new housing travel plans.	Pending full release of funds and commencement of development	Lengthy Timescale
23	Taxi Licensing conditions	Promoting Low Emission Transport	Taxi Licensing conditions	MDDC	2017/2018	1-5 years	Policy review undertaken to develop ULEV taxi fleet and infrastructure	Low	Current policy updated 2017.	Ongoing	
24	Explore alternative parking and traffic flow measures	Traffic Management	Congestion management	MDDC / DCC	2017/2018	1-5 years	Improved traffic flows Decrease in main street parking Increase use of Mid Devon car parks	Medium	Measures identified by Town Councils and MDDC. Introduces resident car parking rates which is often unfavourable.	Ongoing	Introduces resident car parking rates which is often unfavourable
25	Cullompton/Wellington Rail link feasibility study	Traffic Management	Congestion management	MDDC and Somerset West and Taunton	2017/2018	1-5 years	Feasibility study completed	Medium	Joint project, £100K committed to study. Local Plan submission.	Ongoing	



## Appendix A: Response to Consultation

On 2<sup>nd</sup> June 2021, a Stakeholder Engagement Workshop was held to discuss the measures included in the draft AQAP. Prior to the workshop, participants were asked to complete an MCA exercise. The findings of the MCA were discussed during the workshop, including the scores and comments. The MCA comments and key points from the workshop discussion are summarised in the tables below.

**Table A. 1 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Develop a priority matrix of low emission vehicle options for MDDC’s vehicle fleet**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Good to know which are the worst performing vehicles.</li> <li>• Would have a good public facing message.</li> <li>• Simple solution with immediate but small benefits.</li> <li>• Removes some of the worst offending vehicles from the road.</li> <li>• It's important the Council are seen to be 'leading' the way and this kind of matrix is a step in the right direction.</li> <li>• Positive impact for noise (early mornings).</li> <li>• Lower energy use and costs for MDDC.</li> <li>• All costs are for the council, so no financial impact on residents or businesses.</li> <li>• Funding available in MDDC budget.</li> <li>• Relatively easy to roll out, low risk, effective where there are lots of vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>• MDDC’s vehicle fleet is not that large – approx. 100 vehicles, so limited scope.</li> <li>• MDDC's vehicle fleet contributes small amounts in comparison to wider vehicle use in District.</li> <li>• Expensive to convert or purchase new vehicles.</li> <li>• The worst polluting vehicles cost the most to replace.</li> <li>• Upfront costs potentially high with newest models likely to provide best reduction in emissions.</li> </ul>	<ul style="list-style-type: none"> <li>• Uncertain if the cost of more expensive vehicles would pass to the households through council tax or other charges.</li> <li>• Relatively simple in terms of procurement but long term maintenance of fleet needs to be accounted for battery life etc.</li> </ul>

**Table A. 2 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Upgrade MDDC’s vehicle fleet**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>Removes some of the worst offending vehicles from the road.</li> <li>Good for the council to set the right example.</li> <li>Positive impact for noise (early mornings).</li> <li>Lower energy use and costs for MDDC.</li> <li>All costs are for the council, so no financial impact on residents or businesses.</li> <li>Very important in terms of community leadership.</li> <li>Less early morning noise.</li> <li>Excellent although localised benefits.</li> <li>Already in budget.</li> <li>Assume simple through procurement.</li> </ul>	<ul style="list-style-type: none"> <li>MDDC’s vehicle fleet is not that large – approx. 100 vehicles, so limited scope.</li> <li>MDDC's vehicle fleet contributes small amounts in comparison to wider vehicle use in District.</li> <li>Expensive to convert or purchase new vehicles.</li> <li>The worst polluting vehicles cost the most to replace.</li> <li>Upfront costs potentially high with newest models likely to provide best reduction in emissions.</li> </ul>	<ul style="list-style-type: none"> <li>Larger vehicles, especially when idle, cause higher emissions. Bigger impact on emissions with these types.</li> <li>Unknown how costs could transfer to households and/or businesses – would council tax increase?</li> <li>Unknowns on long term efficiency of the vehicles.</li> </ul>

Page 82

**Table A. 3 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: MDDC staff travel strategy**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>If staff return to the office, this will be high impact.</li> <li>Co-benefits for staff health and wellbeing.</li> <li>Massive opportunity to change our climate (pollution) impact as an organisation, and our community influence.</li> <li>Massive opportunity for community influence. Scope of influence much wider than just fleet.</li> <li>No requirement to increase tax burden to implement.</li> <li>This should lower costs, or have a minimal</li> </ul>	<ul style="list-style-type: none"> <li>Limited take up for those living within and around Tiverton.</li> <li>Needs careful management to succeed.</li> <li>Simple but take up will be limited. Greater barriers to be resolved e.g. times and frequency of public transport.</li> <li>Depends on how far the plan goes. Simple commitment to 'car share' easy to implement but not very effective.</li> </ul>	<ul style="list-style-type: none"> <li>Would be important to understand how many staff will be returning as before Covid.</li> <li>A better approach would be to look at the need for travel at all, e.g. working from home more.</li> <li>Adjusting working and travel practices should not have an impact on households or businesses, but may impact on staff available to make visits.</li> <li>Management will be difficult to start with, but should normalise rapidly, enabled by</li> </ul>

Strengths	Weaknesses	Other comments
<p>change to costs – within remit of council already.</p> <ul style="list-style-type: none"> <li>• Low risk.</li> </ul>		<p>e.g. shared technology and apps.</p> <ul style="list-style-type: none"> <li>• Communication and consultation with staff integral.</li> <li>• Take it back a step further, consider how MDDC want to work post-Covid and have a wider workplace strategy.</li> <li>• Revised workplace strategy to include smart offices, hybrid working, join in the travel strategy alongside that. Link with other strategies – e.g. low-carbon and the target to become carbon neutral by 2030.</li> </ul>

**Table A. 4 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Low emission taxi programme**

Page 83

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Visible and sets a positive example.</li> <li>• Taxis typically travel further in a day than most other types of vehicle, including private vehicles.</li> <li>• Impact of vehicles – they will spend 99% of their time in mid Devon, there will be an impact on local emissions.</li> <li>• Impact is disproportionate compared to other vehicle types.</li> </ul>	<ul style="list-style-type: none"> <li>• No taxi rank in Crediton.</li> <li>• Taxis make up small amount of vehicles in district.</li> <li>• Doesn't address the number of cars on the roads.</li> <li>• Potential for costs to be passed on to residents through taxi fares.</li> <li>• Vehicles can be expensive and the timeline for implementation is important.</li> <li>• Investment in charging points depending on numbers required could be high cost.</li> </ul>	<ul style="list-style-type: none"> <li>• Unnecessary infrastructure for taxis only, should be for all use.</li> <li>• Limited scope, but important to address the journey types that taxis serve.</li> <li>• Benefit if taxis are shared, and private taxis usually aren't.</li> <li>• The infrastructure is vital, and we are a rural district with relatively small ranks etc.</li> <li>• Uncertain of risk due to need to identify suitable locations, number etc and encouraging taxis to be involved.</li> <li>• Taxi licensing is something MDDC can control more.</li> </ul>

**Table A. 5 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Upgrade / retrofit buses**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>Public perception.</li> <li>Effect on health.</li> <li>Noise reduction and lower carbon emissions especially on High Street.</li> <li>Encourage travel on public transport, reduces number of private vehicles.</li> <li>Costs should be low as companies privately owned; buses don't fall within District responsibilities.</li> <li>Low risk, bus companies should be on board.</li> </ul>	<ul style="list-style-type: none"> <li>Buses make up a small number of vehicles in Mid Devon.</li> <li>MDDC don't seem to have as much influence on the buses as e.g. in other parts of the country.</li> </ul>	<ul style="list-style-type: none"> <li>Retrofit depends on properly-informed and well-funded decisions.</li> <li>Upgrade to EV is lower risk.</li> <li>Unknown how easy to change buses, also would need cross border collaboration as many buses.</li> </ul>

**Table A. 6 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Electric vehicle strategy including development of EV charging network**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>Health benefits.</li> <li>Reduction in noise pollution.</li> <li>National level funding.</li> <li>Private and community investment opportunities.</li> <li>Simple to install, likely increased take up in general population with Govt aspirations.</li> <li>Existing S106 funding within the council.</li> <li>Plenty of scope to build on this measure.</li> <li>Lots of appetite / enthusiasm for these sorts of measures.</li> <li>With new builds it might be easier to put something into planning documents to require charging points. There is a policy requiring EV charging points for residential and non-residential new builds in Tiverton, Cullompton and Crediton.</li> </ul>	<ul style="list-style-type: none"> <li>Limited scope; but demand is growing.</li> <li>Does not remove all emissions (tailpipe only = localised impact).</li> <li>Does not reduce road traffic.</li> <li>High costs to households for the vehicles.</li> <li>Poorly understood implications of demand and contract agreements. Depends on clear objectives and a continued good funding terms.</li> <li>Risk of costs to put network in but not used.</li> <li>Pressure on the grid to cope with additional EV charging points.</li> <li>Concerns about residents parking, encouraging residents to take on EVs, and business parking.</li> <li>Concerns about where to have public EV parking due to cables etc.</li> </ul>	<ul style="list-style-type: none"> <li>Given Government aspiration to move to electric vehicles long term take up of electric could increase over time.</li> <li>If it is easier for people to make a low emission choice then the impact could be high.</li> <li>Should be lower costs if high roll out.</li> <li>Uncertain if costs of providing the network is passed on e.g. Council tax.</li> <li>Low cost but with some risk of hidden costs.</li> <li>Over time, reduced risk as more people purchase EV cars.</li> <li>Need to carefully choose locations and have prioritisation about where to install first.</li> <li>Need to consider: EV chargers on</li> </ul>

## Mid Devon District Council AQAP

Strengths	Weaknesses	Other comments
		<p>council-owned land, business and commercial land, policies with respect to new builds. Have mainly been considering on-street parking but domestic off-street is important too.</p> <ul style="list-style-type: none"> <li>• Need to consider types of charging and ensuring the charging is appropriate for the location (e.g. not slow chargers for somewhere people park for a short period of time, like a shopping centre).</li> </ul>

**Table A. 7 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Fleet recognition scheme**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Low costs for all involved.</li> </ul>	<ul style="list-style-type: none"> <li>• Low impact on emissions, high on perception.</li> <li>• Probably needs cross boundary approach to work.</li> <li>• High cost per tCO<sub>2</sub>e if hardly any businesses volunteer to join a local scheme.</li> <li>• Bigger companies likely to look to a national scheme as things like ECOStars aren't large enough for them.</li> <li>• Schemes like this often fizzle out after a while.</li> </ul>	<ul style="list-style-type: none"> <li>• Steer businesses to a national scheme.</li> <li>• Local taxation would be better financially.</li> <li>• Does not seem to fit the role of MDDC.</li> <li>• Think MDDC was the first local authority to broaden out ECOStars outside of the original scheme.</li> <li>• Overarching communications strategy should be considered. A lot of these measures could be put together as a communications strategy.</li> <li>• Fleet Operator Recognition Scheme seems to be more focused on safety and legislation, but maybe move more onto air quality going forward.</li> </ul>

**Table A. 8 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Clean air campaign**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Huge benefit to health, noise and congestion (especially on High Street).</li> <li>• Potential for massive change.</li> <li>• Can reach general population which will have a greater effect than anything only done for our individual organisation.</li> <li>• Community engagement and partnership can be highly efficient.</li> <li>• Possibility to link to Clean Air Day.</li> <li>• Momentum from a lot of temporary measures during Covid (e.g. school streets, temporary bicycle lanes, etc.).</li> <li>• Potential to link to active travel – options through S106 to improve walking and cycling links.</li> <li>• There's a real desire for people to have more and better access to non-traffic areas where they can move about in town centres.</li> </ul>	<ul style="list-style-type: none"> <li>• Could have direct effects on some businesses e.g. cycle store or indirect through events.</li> <li>• Risk of showing AQ means that people may not want to wait at bus stops or even visit our High Street.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction in emissions depends how coherently we enable change. Bad example: create cycle lanes but fail to reduce vehicle density or exclude polluters.</li> <li>• Will require some marketing expertise and strategy to measure effectiveness and impact.</li> <li>• Impact depends on how engaged the public are in the campaign.</li> <li>• Need to ensure the messages resonate with different audiences to have an impact and encourage personal change that may have a cost.</li> <li>• Depends on coherence of support (e.g. broadband) vs limitations (e.g. lack of safe cycle routes, lack of AQ enforcement).</li> <li>• Would need ongoing costs, one event won't provide message - will need to be continual.</li> <li>• Cost will vary based on how sophisticated the campaign is.</li> <li>• Risks depend on scheme, could be successful but could also be unsuccessful. Depends on promotion material and events etc.</li> <li>• Low risk approach if the campaign is basic but more sophisticated could lead to greater rewards.</li> <li>• School streets should be considered (making it more difficult to drop off at school by cars).</li> </ul>

**Table A. 9 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Solid fuel burning public information campaign**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Good educational opportunity.</li> <li>• Could have a localised impact on air quality of e.g. neighbours.</li> <li>• Likely to reduce complaints about bonfires/smoke.</li> </ul>	<ul style="list-style-type: none"> <li>• Highly rural district. Majority of fuel use is not solid fuel.</li> <li>• Use of solid fuels is likely to be limited or not easily changed for those using them.</li> <li>• High costs to residents / businesses if paying to dispose of items which may have been burned.</li> <li>• Risk of if people don't take notice, dumping waste in countryside.</li> <li>• Could get push back from those undertaking this currently.</li> <li>• Legislation can be difficult to enforce.</li> </ul>	<ul style="list-style-type: none"> <li>• Broader education campaign preferred, especially relating to bonfires. Information on alternative means of disposal.</li> <li>• Encourage green waste collections, more trips to the tip having to source alternative fuels.</li> <li>• Policy introduction limited cost. Campaign some cost.</li> <li>• Opportunity here to do joint campaign and communications with trading standards. Sharing intelligence, sharing information between organisations. Link with air quality nuisances and understanding the impact beyond the immediate nuisance.</li> <li>• Overarching communications strategy should be considered. A lot of these measures could be put together as a communications strategy. Lots of different audiences, so could be a good idea to join them up. People might take notice of one subject and then find info on another.</li> </ul>

**Table A. 10 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Anti-idling campaign**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Idle vehicles in the High Street create high emissions – impact here could be high.</li> <li>• Could have a wide reach and simple to do.</li> <li>• Reduction in emissions, especially in areas with high pedestrian footfall with children / toddlers etc.</li> <li>• Costs shouldn't be too high – education / signage base.</li> </ul>	<ul style="list-style-type: none"> <li>• Limited powers of MDDC.</li> </ul>	<ul style="list-style-type: none"> <li>• New cars stop engine. Simpler to impose Clean Air zones e.g. ban fossil fuel vehicles in town centres.</li> <li>• MDDC limited powers on highways? Best for County level action?</li> <li>• Costs and campaign should be continual.</li> </ul>

**Table A. 11 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Promote data captured from the AQ monitoring network**

Page 88

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• Relatively low cost – administration and accumulating information.</li> <li>• There is always an appetite to see the air quality data.</li> <li>• One of the real time sensors recently installed is near a school in Crediton – potential to link to data promotion in schools.</li> </ul>	<ul style="list-style-type: none"> <li>• Telling people what the air quality is in their area won't necessarily change what they will do, it needs to be coupled to education about what they can do.</li> <li>• Easily neglected or underfunded after an initial supportive launch.</li> <li>• On its own won't make much difference. If coupled with other options could be part of wider messaging.</li> </ul>	<ul style="list-style-type: none"> <li>• Public information is important.</li> <li>• Can we automate it all to minimise costs?</li> <li>• Impact will depend on how data is communicated.</li> <li>• Data needs to be accessible to everyone.</li> </ul>



**Table A. 12 – Summary of Responses to Stakeholder Engagement on the ‘New Thinking’ AQAP measures: Promotion of Car Share Devon scheme**

Strengths	Weaknesses	Other comments
<ul style="list-style-type: none"> <li>• This is one of the few ways we have to influence car use.</li> <li>• Reduces emissions.</li> <li>• Element of wellbeing, meeting new people.</li> <li>• Broad scope, legacy effect.</li> <li>• Lifestyle changes.</li> <li>• Greener tourism influence.</li> <li>• Greener travel planning.</li> <li>• Benefit of reduced car running costs for households. Reduced need to buy and maintain private cars.</li> <li>• Opportunity for partnerships, community support, funding and scheme revenue.</li> </ul>	<ul style="list-style-type: none"> <li>• Difficult to organise through communities, better suited within workplaces.</li> <li>• Car sharing only works if everything lines up between 2 or more people.</li> <li>• With Covid-19 people are more cautious in doing this.</li> <li>• Uptake is likely to be small.</li> <li>• Safeguarding, safety concerns.</li> </ul>	<ul style="list-style-type: none"> <li>• Impact depends on clear objectives, well-informed commercial venture decisions, coherent long-term investment commitments.</li> </ul>

DRAFT

## Appendix B: MDDC Local Plan Key Policies

**Table B. 1 – Strategic policies**

Policy	Description
<b>S1</b> Sustainable development priorities	<ul style="list-style-type: none"> <li>Preventing significant harm to air, in particular air quality as a local issue at Cullompton and Cullompton.</li> </ul>
<b>S2</b> Amount and distribution of development	<ul style="list-style-type: none"> <li>New road linkages to relieve traffic congestion in town centres, and investment in infrastructure to address long-standing air quality issues.</li> <li>Air quality expected to improve following opening of Cullompton Link Road to draw a proportion of HGV and other traffic away from Exeter Road.</li> </ul>
<b>S8</b> Infrastructure	<ul style="list-style-type: none"> <li>It is expected that new development will utilise infrastructure which will co-benefit wider planning objectives such as air quality improvements.</li> <li>Developments which are likely to generate significant levels of traffic must be supported by a robust transport evidence base.</li> </ul>
<b>S11</b> Cullompton	<ul style="list-style-type: none"> <li>Measures to support implementation of Cullompton AQAP through inclusion of construction of new highway links to relieve town centre and to enhance walking and cycling routes across the town.</li> <li>The concurrent development of the North West Cullompton Urban Extension will act to relieve traffic congestion in the town centre.</li> <li>A new relief road towards the east of the town centre will further improve air quality by diverting north and south-bound traffic away from Fore Street.</li> <li>Investment in infrastructure can address long-standing air quality issues associated with the significant growth in Cullompton.</li> </ul>
<b>S12</b> Cullompton	<ul style="list-style-type: none"> <li>Measures to support implementation of Cullompton AQAP through inclusion of construction of new highway links to relieve town centre and to enhance walking and cycling routes across the town.</li> <li>A key action from the AQAP has been provided through the Cullompton Link Road which is expected to have a significant impact on improving local air quality. It will act to reduce the proportion of HGVs and other traffic entering the town centre.</li> <li>Air quality monitoring to be conducted to determine if pollutants have reduced significantly for the AQMA to be withdrawn</li> </ul>

Table B. 2 – Site allocation policies

Policy	Description
<b>CU1</b> North West Cullompton	<ul style="list-style-type: none"> <li>100 ha site to the North West of Cullompton is allocated for mixed used development subject to carbon reduction and air quality improvements.</li> <li>Cullompton High Street is subject to severe traffic congestion due to its junction with Tiverton Road which has led to adverse effects on local air quality. Development will require a new road link between Tiverton Road and Willand Road to divert traffic from the new development.</li> <li>Introduction of traffic management measures on Tiverton and Willand Road.</li> <li>Implementation of Cullompton Town Centre Relief Road to mitigate morning congestion at junction 28 on the M5 motorway.</li> </ul>
<b>CU2</b> North West Cullompton Transport Provision	<ul style="list-style-type: none"> <li>Transport infrastructure will be provided and funded by all new developments within the North West Cullompton site. This will be done through Implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts.</li> </ul>
<b>CU5</b> North West Cullompton Carbon Reduction and Air Quality	<ul style="list-style-type: none"> <li>Implement measures to ensure that impacts of the site on air quality are acceptable.</li> <li>An assessment of the air quality impact of the potential development proposed in the Local Plan was undertaken in 2014, it found no significant cumulative air quality effects are anticipated.</li> </ul>
<b>CU7</b> East Cullompton	<ul style="list-style-type: none"> <li>A 160 ha site to the East of Cullompton is allocated for mixed use development which is subject to carbon reduction and air quality improvements.</li> <li>It is accepted that development within Cullompton is constrained by the limited capacity of junction 28 of the motorway, as well as traffic congestion and poor air quality in the town centre.</li> <li>It is believed that this development along with the urban extension towards the northwest of Cullompton will help relieve town centre traffic problems, hence improve air quality.</li> </ul>
<b>CU8</b> East Cullompton Transport Provision	<ul style="list-style-type: none"> <li>Part of the East Cullompton development requires contributions towards the delivery of implementing travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts</li> </ul>
<b>CU11</b> East Cullompton Carbon Reduction and Air Quality	<ul style="list-style-type: none"> <li>Implement measures to ensure that impacts of the site on air quality are acceptable.</li> <li>During the 2014 assessment of air quality impacts it was found that the development of East Cullompton would not have a significant effect on the Cullompton AQMA.</li> <li>During the masterplan design of the new development the potential for air quality effects should be considered. Particular consideration should be taken with the distances between residential properties and the M5.</li> </ul>
<b>CU13</b> Knowle Lane	<ul style="list-style-type: none"> <li>A 9.8 ha site at Knowle Lane is allocated for residential development which is subject to implementation of a Travel Plan and other measures to minimise carbon footprint and air quality impacts</li> </ul>
<b>CU14</b> Ware Park and Footlands	<ul style="list-style-type: none"> <li>A 2.1 ha site at Ware Park and Footlands is allocate for residential developments which requires in the policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts.</li> </ul>

Policy	Description
	<ul style="list-style-type: none"> <li>It has been acknowledged that development within this location will impact the Cullompton AQMA and will require mitigation.</li> </ul>
<b>CU15</b> Land at Exeter Road	<ul style="list-style-type: none"> <li>A 1.4 ha site at Exeter road is allocated for residential development which requires in the policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts.</li> </ul>
<b>CU16</b> Cummings Nursery	<ul style="list-style-type: none"> <li>A 2.78 ha site at Exeter road is allocated for residential development which requires in the policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts.</li> </ul>
<b>CU17</b> Cummings Nursery	<ul style="list-style-type: none"> <li>A 10.7 ha site at Cummings Nursery is allocated for employment development which requires in the policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts.</li> </ul>
<b>CU18</b> Venn Farm	<ul style="list-style-type: none"> <li>A 4.4 ha site at Venn Farm is allocated for employment development which requires in the policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts.</li> </ul>
<b>CU19</b> Town Centre Relief Road	<ul style="list-style-type: none"> <li>A relief road, providing traffic relief to the town centre. Previously the relief road was known as the Eastern Relief Road. Evidence suggests that a further road to the east of the town centre is paramount to achieve the objectives of traffic relief and air quality improvements to be met.</li> </ul>
<b>CU20</b> Cullompton Infrastructure	<ul style="list-style-type: none"> <li>Implementation of CU19 and other measures in the Cullompton AQAP.</li> </ul>
<b>CU21</b> Land at Cole Brook	<ul style="list-style-type: none"> <li>A 4.8 ha site at Cole Brook is allocated for residential development which requires in the policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts</li> </ul>
<b>CRE4</b> Woods Group, Exeter Road	<ul style="list-style-type: none"> <li>A 0.17 ha site at Venn Farm is allocated for employment development.</li> <li>Mitigation for potential onsite air quality issues with specific design to prevent worsening of air quality on Exeter Road and to avoid potential air quality issues for occupants.</li> </ul>
<b>CRE11</b> Crediton Infrastructure	<ul style="list-style-type: none"> <li>The council will use the Community Infrastructure Levy and planning obligations to deliver air quality improvements for Crediton.</li> </ul>
<b>TIV2</b> Eastern Urban Extension Transport Provision	<ul style="list-style-type: none"> <li>Implement Travel Plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts.</li> </ul>
<b>TIV6</b> Farleigh Meadows	<ul style="list-style-type: none"> <li>A site of 11.2 ha has been allocated for residential development which is subject to measures to mitigate air quality impacts at Leat Street.</li> <li>Poor air quality exists at Leat Street and is expected to worsen as traffic generation increases. Any significant changes to the already consented scheme will require updated studies of potential impacts along with funded measures to mitigate any air quality impacts.</li> </ul>
<b>TIV16</b> Blundell's School	<ul style="list-style-type: none"> <li>A site of 14 ha north of Blundell's School is allocated for residential development.</li> <li>Implement Travel Plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts.</li> </ul>

Policy	Description
	<ul style="list-style-type: none"> <li>Western end of Blundell's Road has been within 15% of the NAQO's, additional road traffic is likely to bring this above NAQO limits.</li> <li>In light of the above site access will be located at Heathcoat Way via a new junction which in the future may form part of the access to the Eastern Urban Extension.</li> <li>Air quality assessments will be required with any applications.</li> </ul>

**Table B. 3 – Sustainable development principles**

Policy	Description
<b>DM3</b> Transport and air quality	<ul style="list-style-type: none"> <li>Development proposals which give rise to vehicular movement require the following documents to be accompanied:                             <ul style="list-style-type: none"> <li>Integrated Transport Assessment – must identify the boundaries for the Low Emissions Assessment</li> <li>Travel Plan</li> <li>Traffic Pollution Assessment – must assess impact of traffic-generate nitrogen oxides on environmental assets</li> <li>Low Emissions Assessment evaluates the effect of the development on local air quality. It must assess impacts on existing AQMAs, or an impact likely to result in the declaration of an additional AQMA. They should also include onsite mitigation measures to reduce negative impacts on local air quality. Air quality exposure modelling should be undertaken at specified residential properties and other sensitive properties within or adjoining an AQMA.</li> </ul> </li> <li>Tiverton is at risk of being designated an AQMA</li> <li>Annex 2 contains Low Emissions Assessment Procedural Guidance</li> </ul>
<b>DM4</b> Pollution	<ul style="list-style-type: none"> <li>Development proposals that negatively risk impacting the quality of the environment must be accompanied by a Pollution Impact Assessment and mitigation schemes where necessary.</li> <li>A development will only be permitted where the cumulative effects of pollution will not have a detrimental effect on health and the natural environment.</li> </ul>

## Appendix C: Source Apportionment

**Table C. 1 – NOx source apportionment for all road transport and background at all monitoring locations within MDDC (%) for the baseline fleet, 2019**

Site name	% contribution to total modelled NOx (background + road transport = 100%)								Total road transport
	Background	Petrol cars	Diesel cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles	
AQMesh Church	19.9	2.9	38.7	10.0	20.7	5.9	1.8	0.1	80.1
AQMesh School	22.5	2.7	36.5	9.2	19.8	7.1	2.2	0.1	77.5
AQMesh Little Bakery	11.2	4.7	39.4	5.8	24.9	10.0	4.0	0.1	88.8
AQMesh Manor House	10.5	4.6	38.6	5.7	24.4	11.5	4.6	0.1	89.5
DT1	67.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	32.2
DT2	68.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31.3
DT3	81.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19.0
DT4	82.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17.5
DT5	55.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	44.1
DT6	51.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	48.5
DT7	36.8	3.1	28.4	3.1	21.2	5.3	1.9	0.2	63.2
DT8	23.9	2.4	30.5	2.5	27.7	9.7	3.0	0.4	76.1
DT9	36.7	3.3	28.1	4.0	18.1	6.9	2.7	0.1	63.3
DT10	13.8	4.3	36.7	4.9	24.5	11.3	4.4	0.2	86.2
DT11	19.6	4.2	35.7	4.8	23.4	8.7	3.4	0.1	80.4
DT12	11.4	4.7	39.3	5.8	24.8	10.0	3.9	0.1	88.6
DT13	9.9	4.7	39.9	5.9	25.2	10.1	4.0	0.2	90.1
DT14	54.7	1.2	19.6	1.5	19.9	2.2	0.7	0.3	45.3
DT15 <sup>25</sup>	79.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20.1
DT16 <sup>25</sup>	88.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.3
DT17 <sup>25</sup>	65.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34.6
DT18	19.0	3.0	40.1	8.7	22.8	4.9	1.4	0.1	81.0
DT19	11.3	3.2	42.5	10.9	23.7	6.4	1.9	0.1	88.7
DT20	8.6	3.3	44.2	11.4	23.6	6.7	2.0	0.1	91.4

<sup>25</sup> DT15, DT16 and D17 do not have any modelled roads nearby so source apportionment has only been completed using background maps.

**Table C. 2 – PM<sub>10</sub> source apportionment for all road transport and background at all monitoring locations within MDDC (%) for the baseline fleet, 2019**

Site name	% contribution to total modelled PM <sub>10</sub> (background + road transport = 100%)								Total road transport
	Background	Petrol cars	Diesel cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles	
AQMesh Church	79.5	5.1	6.6	2.1	4.4	1.5	0.6	0.1	20.5
AQMesh School	81.6	4.5	5.9	1.9	4.0	1.5	0.6	0.1	18.4
AQMesh Little Bakery	72.8	8.4	7.2	1.2	6.3	2.6	1.3	0.1	27.2
AQMesh Manor House	71.6	8.6	7.3	1.3	6.4	3.1	1.6	0.2	28.4
DT1	98.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.3
DT2	98.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.6
DT3	98.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.5
DT4	98.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.7
DT5	98.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.8
DT6	98.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.8
DT7	92.3	2.5	2.0	0.3	1.7	0.7	0.4	< 0.1	7.7
DT8	85.8	3.5	3.0	0.5	3.0	2.8	1.4	0.1	14.2
DT9	92.8	2.3	1.9	0.3	1.7	0.7	0.4	< 0.1	7.2
DT10	76.8	7.0	5.9	1.0	5.0	2.8	1.4	0.1	23.2
DT11	84.1	5.0	4.2	0.7	3.6	1.6	0.8	0.1	15.9
DT12	73.4	8.3	7.0	1.2	6.2	2.5	1.3	0.1	26.6
DT13	70.2	9.2	7.9	1.3	6.9	2.8	1.4	0.2	29.8
DT14	96.2	1.0	0.9	0.2	1.1	0.4	0.2	< 0.1	3.8
DT15 <sup>26</sup>	99.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.7
DT16 <sup>26</sup>	99.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.5
DT17 <sup>26</sup>	99.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.5
DT18	77.6	5.5	7.2	2.0	5.1	1.7	0.7	0.1	22.4
DT19	65.1	8.5	11.1	3.6	7.7	2.9	1.2	0.1	34.9
DT20	60.4	9.8	12.8	4.1	8.6	3.0	1.2	0.2	39.6

<sup>26</sup> DT15, DT16 and D17 do not have any modelled roads nearby so source apportionment has only been completed using background maps.

**Table C. 3 – PM<sub>2.5</sub> source apportionment for all road transport and background at all monitoring locations within MDDC (%) for the baseline fleet, 2019**

Site name	% contribution to total modelled PM <sub>2.5</sub> (background + road transport = 100%)								Total road transport
	Background	Petrol cars	Diesel cars	Buses	LGVs	Rigid HGVs	Artic HGVs	Motorcycles	
AQMesh Church	<b>78.6</b>	4.3	6.3	2.2	6.6	1.3	0.5	0.1	<b>21.4</b>
AQMesh School	<b>80.6</b>	3.9	5.7	2.0	6.0	1.3	0.5	0.1	<b>19.4</b>
AQMesh Little Bakery	<b>70.3</b>	7.4	7.2	1.4	9.8	2.4	1.2	0.2	<b>29.7</b>
AQMesh Manor House	<b>69.0</b>	7.6	7.4	1.4	10	2.9	1.5	0.2	<b>31.0</b>
DT1	<b>98.9</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>1.1</b>
DT2	<b>98.6</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>1.4</b>
DT3	<b>98.4</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>1.6</b>
DT4	<b>98.1</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>1.9</b>
DT5	<b>98.5</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>1.5</b>
DT6	<b>98.5</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>1.5</b>
DT7	<b>91.5</b>	2.2	2.1	0.3	2.8	0.7	0.4	0.1	<b>8.5</b>
DT8	<b>84.3</b>	3.3	3.2	0.5	4.7	2.6	1.3	0.1	<b>15.7</b>
DT9	<b>92.0</b>	2.0	2.0	0.4	2.6	0.7	0.3	< 0.1	<b>8.0</b>
DT10	<b>74.6</b>	6.3	6.0	1.1	8.0	2.6	1.3	0.1	<b>25.4</b>
DT11	<b>82.4</b>	4.5	4.3	0.8	5.7	1.5	0.8	0.1	<b>17.6</b>
DT12	<b>70.9</b>	7.3	7.1	1.4	9.6	2.4	1.2	0.2	<b>29.1</b>
DT13	<b>67.6</b>	8.1	7.9	1.5	10.7	2.6	1.4	0.2	<b>32.4</b>
DT14	<b>95.6</b>	1.0	1.0	0.2	1.7	0.4	0.2	< 0.1	<b>4.4</b>
DT15 <sup>27</sup>	<b>99.3</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>0.7</b>
DT16 <sup>27</sup>	<b>99.3</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>0.7</b>
DT17 <sup>27</sup>	<b>99.3</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>0.7</b>
DT18	<b>76.2</b>	4.8	6.9	2.1	7.6	1.6	0.6	0.1	<b>23.8</b>
DT19	<b>63.9</b>	7.1	10.4	3.7	11.3	2.5	1.0	0.2	<b>36.1</b>
DT20	<b>58.9</b>	8.3	12.1	4.2	12.7	2.6	1.0	0.2	<b>41.1</b>

<sup>27</sup> DT15, DT16 and D17 do not have any modelled roads nearby so source apportionment has only been completed using background maps.



## Appendix D: Longlist of actions

Table D. 4 – Longlist of actions considered for AQAP

Theme	Ref.	Action	Description	Status
Improving technologies	AQAP1	Develop a priority matrix of low emission vehicle options for MDDC's vehicle fleet	This could take the form of a simple Excel-based model, to provide an assessment of the current performance of fleet vehicles, in comparison with the latest available models and retrofit technologies. Assessment criteria to include emissions performance, and fuel, maintenance and capital costs. Fleet to be reviewed on an annual basis, to ensure continuing improvement.	New thinking
	AQAP2	Upgrade MDDC vehicle fleet	This measure will involve improvements to MDDC's fleet, including HGVs and LGVs, with a focus on replacing vehicles with ULEV alternatives. The Council's vehicle fleet incorporates a large number of diesel vehicles, and although improvements are continuously being considered and applied, there may be opportunities to fast-track this process to improve air quality. Consideration will be given to the existing procurement agreement and how this will affect potential vehicle upgrades. The direct impact of changes to the Council's own activities will be relatively small in terms of air quality and emissions overall, but as a figurehead and major employer in the district, their actions will set an example for others to follow.	New thinking
Mode shift	AQAP3	MDDC staff travel strategy	The preparation of an MDDC Environmental Travel Strategy might include incentives for public transport use and bicycle schemes, preferential parking, car share etc.	New thinking
Monitoring and data	AQAP4	Real time sensor AQ monitoring at new locations in Crediton & Cullompton	Four real-time air quality (AQMesh) sensors were installed by Ricardo at locations across the district. Two were deployed along the each of the main routes through the Crediton and Cullompton AQMAs, the A377 and B3181 respectively. The sensor outputs are: NO <sub>2</sub> (hourly mean), PM <sub>10</sub> (24 Hour mean), PM <sub>2.5</sub> (24 Hour mean), NO (hourly mean) and NO <sub>x</sub> as NO <sub>2</sub> (hourly mean). Data is available to download from Air Quality England (AQE).	Under implementation

Theme	Ref.	Action	Description	Status
	AQAP5	Review of current monitoring in region	<p>MDDC commissioned a comprehensive review of the Council's air quality monitoring, reporting, assessments and planning documents to ensure that all current monitoring requirements are identified. Feedback from Defra on the council's 2018 Annual Status Report noted the requirement to review current monitoring locations given the extent of new infrastructure developments proposed. The review, completed in 2019, proposed the following recommendations:</p> <ul style="list-style-type: none"> <li>• Revoking the Crediton AQMA based on particulates. Particulate sensors may offer an alternative measurement methodology and provide better value for particulate measurements going forward.</li> <li>• Retention of the AQMA declarations for annual mean NO<sub>2</sub> concentrations at Cullompton and Crediton.</li> <li>• The establishment of a low-cost monitoring network using AQ Mesh Sensors across the district.</li> </ul>	Operational
	AQAP6	Air quality assessment of Crediton traffic management schemes	<p>Crediton Town Council commissioned a study to define traffic management improvements for key roads in the town. The scheme was developed in response to the further development planned in Crediton (as well as other edge of settlement land uses) and its implications for potential air quality issues in the High Street area. MDDC commissioned an Air Quality Impact Assessment (AQIA) to analyse the air quality impacts of the proposed scheme. The AQIA was performed in conjunction with the installation of the deployment of two real-time sensors at locations along the A377. The study aimed to determine the impact of proposed traffic management improvements on the air quality within the Crediton AQMA. Modelled concentrations of NO<sub>2</sub> annual and hourly means were presented for the current 2019 Baseline and a 2019 Proposed scenario and used to assess the impact of the proposed traffic management schemes.</p> <p>The findings of the assessment, which was completed during 2020, were as follows:</p> <ul style="list-style-type: none"> <li>• Analysis of the change in annual concentration at roadside modelled receptor points showed the largest changes in NO<sub>2</sub> annual mean concentrations around the High Street area, where the current air quality issues have been identified.</li> <li>• The traffic management measures were predicted to decrease the annual mean NO<sub>2</sub> concentration at the monitoring site that currently shows an exceedance on Crediton High Street to 37.54 µg.m<sup>-3</sup>.</li> <li>• All modelled hourly mean NO<sub>2</sub> concentrations were well below the one hour mean NO<sub>2</sub> AQO of 200 µg.m<sup>-3</sup> not to be exceeded more than 18 times a year.</li> <li>• Some receptors towards the Eastern Gateway showed an increase in the</li> </ul>	Operational

## Mid Devon District Council AQAP

Theme	Ref.	Action	Description	Status
			NO <sub>2</sub> annual mean of between 0.25 and 2.10 µg.m <sup>-3</sup> and resulted in one new exceedance of the AQO which increased from 39.91 µg.m <sup>-3</sup> to 40.89 µg.m <sup>-3</sup> .	
<b>Public transport and taxis</b>	AQAP7	Low emission taxi programme	Like the Council fleet, taxis will not have a major impact across the whole district, but they have a greater impact per vehicle than other cars due to the way they are operated and could be a highly visible part of the district's transport system. It is therefore important that they work towards being a clean and efficient fleet. Investment in taxi charging hubs and related infrastructure, or priority taxi ranks could be potential options to encourage change.	New thinking
	AQAP8	Upgrade / retrofit buses	Buses are a key alternative to car traffic and making sure these are clean and efficient will be an important part of their role in improving air quality in the district.	New thinking
	AQAP9	Taxi licensing conditions	Including environmental considerations in the requirements for taxi permits will lead to a reduction of air pollution from the use of Taxis. The taxi licensing policy was updated most recently in 2018, and became effective on 1 <sup>st</sup> January 2019. <sup>28</sup>	Operational
<b>Plans and policies</b>	AQAP10	Develop a domestic solid fuel policy	The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 are to be enforced by the relevant Local Authority. How these regulations are enforced at a Local Authority level needs to be considered. A domestic solid fuel policy for Mid Devon could make enforcement of these Regulations easier. Guidance will be made available for local authorities so that their enforcement officers have a clear understanding of the certification schemes and their ability to enforce the legislation.	New thinking

<sup>28</sup> Mid Devon District Council Hackney Carriage & Private Hire Licensing Policy, 2018, <https://www.middevon.gov.uk/media/346606/final-hackney-carriage-and-private-hire-policy.pdf>

Theme	Ref.	Action	Description	Status
	AQAP11	Develop a bonfire policy	<p>There are laws about burning certain types of waste and to prevent bonfires causing a nuisance. The Council has a responsibility to investigate complaints of smoke and fumes that could be classed as a 'statutory nuisance'. A bonfire policy could enable residents to make better decisions around when, where, and how to have their bonfires, by providing guidance. It could also inform residents about the human and environmental health impacts of bonfires, and reduce the occurrence of bonfires. Options for greater restrictions on open burning and bonfires must be considered. Examples in other local authorities largely relate to guidelines and public information as there are legal limitations in place, particularly regarding domestic bonfires. Guidelines - <a href="https://www.threerivers.gov.uk/download?id=46788">https://www.threerivers.gov.uk/download?id=46788</a> , <a href="https://www.lewes-eastbourne.gov.uk/environmental-problems/bonfires/">https://www.lewes-eastbourne.gov.uk/environmental-problems/bonfires/</a> Public information leaflet - <a href="https://www.adur-worthing.gov.uk/media/Media,96840,smxx.pdf">https://www.adur-worthing.gov.uk/media/Media,96840,smxx.pdf</a></p>	New thinking
	AQAP12	Electric vehicle strategy including development of EV charging network	<p>Policy DM8 of the Local Plan Part 3 identifies a minimum standard for the provision of EV infrastructure as recommended by the Low Emissions Strategic Partnership for 3-phase or accelerated electricity supply. Individual properties within new housing developments will have their own charging points. Currently there are s106 allocations for improving the EV charging network in Crediton (£100K) and Cullompton (£150K).</p> <p>This measure will aim to promote the development of a broader electric vehicle strategy across Mid Devon, with the objective of creating long-term infrastructure which supports the use of low emission vehicles for local residents and businesses. The strategy will underpin several of the other measures, including improvements to the Council's vehicles and the Low Emission Taxi Programme. This will look to mirror other similar strategies adopted by local authorities across the UK. Specific actions may include (subject to successful funding bids):</p> <ul style="list-style-type: none"> <li>• Additional electric vehicle charging facilities at main traffic generator sites (including employment sites, shopping centres and leisure facilities);</li> <li>• Preferential parking policies to reduce costs for electric vehicles (also in association with EV chargers &amp; associated costs); and</li> <li>• Priority traffic management measures for ULEV's (e.g. bus lane use).</li> </ul> <p>The strategy will promote the use of EVs and likely to reduce travel times if EVs are not having to wait for the use of a charging station.</p>	New thinking

## Mid Devon District Council AQAP

Theme	Ref.	Action	Description	Status
	AQAP13	Updating the Supplementary Planning Document (SPD) on Air Quality and Development	The SPD on Air Quality and Development was extensively reviewed as part of the Ricardo report "Review of Mid Devon District Council's Air Quality Planning Policies" and a number of improvements were suggested. The update to the SPD is underway and is expected to be completed by Summer 2020.	Under implementation
	AQAP14	Planning conditions on Tiverton Eastern Urban extension	Masterplan for a large urban development was accepted in June 2018. MDC now needs to ensure that all phased planning applications are considered with respect to the Mid Devon Core Strategy (2007) and supplementary planning documents (2008). This major extension to the east of Tiverton requires detailed Low Emission Strategies from developers.	Under implementation
	AQAP15	Review of planning policies	A significant amount of development, which has the potential to impact ambient air quality, has been proposed for Mid Devon. In recognition of this, MDDC commissioned a review of how air quality is being considered in its planning policies and guidance and how this can be strengthened. The review was conducted in 2019. The outcome of this provided a review of current MDDC planning policies and guidance, and other LA guidance and approaches, and offers recommendations on potential areas of improvement, including: <ul style="list-style-type: none"> <li>Ensuring all relevant plans and policies developed by MDDC reflect the importance of addressing air quality issues in the district.</li> <li>Introducing a new system for classifying developments, which offers a user-friendly resource for developers and ensures risks to air quality are appropriately addressed.</li> <li>Ensuring developers are required to apply the latest technical guidance for air quality assessments.</li> <li>The development of a new emissions mitigation assessment based on the latest IGCB Air Quality Damage Costs and Emission Factor Toolkit.</li> <li>Ensuring a consistent approach to the determination of significance of air quality impacts, that requires the application of professional judgement in the interpretation air quality assessments</li> </ul>	Operational
	AQAP16	Development of a Low Emission Strategy (LES) for Cullompton	Emissions and economic assessments were completed in 2019 and report has been submitted by Ricardo.	Operational

Theme	Ref.	Action	Description	Status
Targeting particulates	AQAP17	Consider implementation of smoke control areas	Under the Clean Air Act, a Local Authority may declare the whole or part of the district of the authority to be a smoke control area (SCA). It is an offence to emit smoke from a chimney of a building, from a furnace or from any fixed boiler if located in a designated SCA. It is an offence to acquire an unauthorised fuel for use within a SCA unless it is used in an “exempt” appliance (“exempted” from the controls which generally apply in the SCA). The current maximum level of fine is £1,000 for each offence. Defra has published the rules for SCAs, available here: <a href="https://uk-air.defra.gov.uk/assets/documents/reports/cat07/1901291328_Smoke_Control_Web.pdf">https://uk-air.defra.gov.uk/assets/documents/reports/cat07/1901291328_Smoke_Control_Web.pdf</a>	New thinking
Infrastructure	AQAP18	Eastern Relief Road Cullompton and additional M5 junction	This is an existing project that intends to support the predicted population growth of Cullompton. Major infrastructure will be required to mitigate current high levels in the town centre and accommodate the increased traffic volumes arising from Cullompton’s proposed growth. Consideration could be given to pedestrianizing the High Street.	Under implementation
	AQAP19	Kings Mill Industrial site traffic management Cullompton Junction 28	The new Local Plan proposes upgrades to the existing road network to support growth of industrial estate and reduce congestion. As the site will increase in size, thus increasing volumes trying to leave/enter the M5, a range of initiatives are proposed to deal with the problem.	Under implementation
	AQAP20	Culm Valley Garden Village development and major infrastructure projects	The 500 home ‘garden village’ aims to support housing demand in the region with high quality design. This includes planning policies which support improvements to local air quality levels including technical guidance on emissions assessment work and low emission strategies.	Under implementation
	AQAP21	Secure cycle parking facilities in town centres and at key transport hubs	Secure and reliable locations to park bikes and other alternatives transport equipment to private vehicles are vital to help citizens overcome any concerns in the up-take of an active travel option. Locations and s106 funding have been identified in Crediton (£8K), and Cullompton (£30K). Locations in Tiverton are under consideration to join the town centre with Tiverton parkway railway station.	Under implementation
	AQAP22	Bus stop infrastructure	Plans are already in place to use S105a contributions to improve bus stop infrastructure. This should lead to an increase in bus service use. S106 allocations are in place for Copplestone bus infrastructure improvements that affect Crediton AQMA (£177K).	Under implementation
	AQAP23	Review of bus stop locations and routes	Regular review of the bus routes, capacity and service usage should be undertaken to ensure that each service is as efficient as possible without impacting those most reliant on it. Review of Cullompton and Crediton services will include frequency, location of bus stops, routes.	Under implementation

## Mid Devon District Council AQAP

Theme	Ref.	Action	Description	Status
	AQAP24	Improving footpath and cycling paths in major towns	Improvement of public infrastructure (safety, number of routes, location of routes and capacity) will help to dissuade citizens from the use of a private vehicle. Some areas that have been identified are: improved footpath and cycleway links between Cullompton town centre and Kingsmill Industrial Estate, and Cromwells Meadow to Leisure centre in Crediton.	Under implementation
	AQAP25	Road resurfacing	Ensure that road surfaces are maintained to an acceptable standard so that vehicles are able to run efficiently and therefore reduce unnecessary air pollution. Smooth road conditions also encourage cyclists. This measure comprises design considerations for relevant road links within both the Cullompton and Crediton AQMAs. There is potential for this to be managed on a contract by contract basis.	Under implementation
	AQAP26	Explore alternative parking and traffic flow measures	Consultation with Town councils has identified a number of smaller measures that could alleviate congestion at Both Crediton and Cullompton. Further consultation with DCC/Highways will be required to look at feasibility.	Operational
	AQAP27	Cullompton / Wellington rail link feasibility study	Land has been identified that will accommodate this infrastructure. A 'bus' hub built next to the Rail Station that links with new developments is proposed.	Operational
<b>Freight</b>	AQAP28	Fleet recognition scheme	As well as ECO Stars, other fleet recognition schemes such as the Fleet Operator Recognition Scheme (FORS) exist, or the Council may wish to undertake actions to recognise and promote clean vehicle fleets themselves. Such examples could include tying fleet recognition to preferential parking or other benefits.	New thinking
	AQAP29	ECO Stars fleet management and recognition scheme	This free scheme aims to assist haulage and bus operators reduce their operations impact on the environment whilst also saving money in the process. The scheme is ongoing and is therefore retained in the new AQAP. The program has good membership in Mid Devon, but does require further expansion to all the districts within Devon.	Operational
<b>Engagement and public awareness</b>	AQAP30	Clean air campaign	This measure combines the encouragement of active travel through marketing campaigns and the provision of cycle infrastructure and incentive schemes. Specific actions could include (subject to successful funding bids): <ul style="list-style-type: none"> <li>• Mid Devon cycling strategy;</li> <li>• Events and promotions (e.g. Clean Air Day, or European Mobility Week);</li> <li>• Live air quality data from the low cost sensor network at bus stops.</li> </ul>	New thinking

Theme	Ref.	Action	Description	Status
	AQAP31	Solid fuel burning public information campaign	<p>The challenge with solid fuels is how to regulate them, as it is difficult to know which stoves and/or fuels are used, and unless there is a smoke control area or a nuisance issue, the actions that can be taken by a local authority are limited. A LA that we collaborated with recently were planning to introduce a policy on open burning and bonfires, so this could be an option. Another option would be a broader education campaign on solid fuels and air quality.</p> <p>There was a presentation on solid fuel burning at the recent IAPSC conference which included some recommendations for the types of measures LAs could introduce:</p> <p><a href="http://www.iapsc.org.uk/assets/document/1220_Session5_IAPSC_Clare_Beattie.pdf">http://www.iapsc.org.uk/assets/document/1220_Session5_IAPSC_Clare_Beattie.pdf</a></p> <p>Defra have also produced a practical guide to 'Open fires and wood-burning stoves':</p> <p><a href="https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1901291307_Ready_to_Burn_Web.pdf">https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1901291307_Ready_to_Burn_Web.pdf</a></p> <p>Brighton &amp; Hove City Council also have some information available online:</p> <p><a href="https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/airquality/Using_Solid_Fuels_Safely_and_Legally_(pdf_0.2_mb).pdf">https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/downloads/airquality/Using_Solid_Fuels_Safely_and_Legally_(pdf_0.2_mb).pdf</a></p>	New thinking
	AQAP32	Anti-idling campaign	<p>This will protect and raise awareness of the unnecessary risk to vulnerable people's health caused by idling. Buses, school and hospital vehicles could be prioritised as they are normally operating in locations where the most vulnerable are (i.e. children, the elderly, and people needing medical care).</p>	New thinking
	AQAP33	Promote data captured from the AQ monitoring network	<p>Promotion and public understanding of the data captured might help the public to become consciously aware of their own impact on local AQ. This may lead to change in routine behaviour, leading to improved local AQ. Evidence of public interest may also help to secure future funding for additional monitoring stations.</p>	New thinking
	AQAP34	Promotion of car share Devon scheme	<p>Local Plan Part 3; Development management Policies – Policy DM6 identifies car club and car sharing schemes as a mitigation measure. Locations and s106 funds have been identified: Crediton (£30K), Cullompton (£30K).</p> <p>This will help residents recognise opportunities to share travel costs and reduce the number of vehicles on the road. Promotion of the scheme will help to reduce the reliance of private vehicles. Current information is available at:</p> <p><a href="https://liftshare.com/uk/community/devon">https://liftshare.com/uk/community/devon</a></p>	New thinking
	AQAP35	Review and continued support of Community Car sharing schemes	<p>It is important that MDDC continue to review the success of the scheme, and support the scheme to overcome any existing or future challenges.</p>	Under implementation



## Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
CO <sub>2</sub>	Carbon Dioxide
DCC	Devon County Council
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
LAQM	Local Air Quality Management
MDDC	Mid Devon District Council
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less

This page is intentionally left blank

## COMMUNITY POLICY DEVELOPMENT GROUP 16 NOVEMBER 2021

### COMMUNITY POLICY DEVELOPMENT GROUP – COMMUNITY SAFETY WORKING GROUP RECOMMENDATIONS

**Cabinet Member(s):** Cllr Dennis Knowles  
**Responsible Officer:** Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing (Chair East & Mid Devon CSP)

**Reason for Report and Recommendations:** To provide members with an overview of the discussions of its Working Group on Community Safety and recommendations that group is putting forward.

**Recommendation:** That members agree the recommendations of the Working Group as follows:

1. That members have the opportunity to complete the Mental Health First Aid Training in order to enhance and support their community liaison role within communities
2. That members have the opportunity to receive a regular Community Safety Partnership (CSP) quarterly updates to assist them keep abreast of current CSP themes, projects and achievements.
3. Officers to provide members with a briefing on Modern Slavery with a local flavour by March 2022
4. Members agree that that officers review Mid Devon District Council becoming a 'Trauma Informed Council' and potentially adopt a trauma informed approach to future service delivery, which may be based on the Plymouth Trauma Informed City model or other examples and provide a subsequent paper for members to review at its January meeting

Recommendations 1-3 refer to all members of the Council and recommendation 4 refers to members of this PDG.

**Financial Implications:** There is no direct financial implications arising from this report aside from the additional cost to cover the cost of training in relation to Mental Health First Aid Training for Members and Trauma Informed Training for Staff. The Council already has access to online Mental Health First Aid training so cost may be minimal and could be met from the corporate or member training budgets if required.

**Budget and Policy Framework:** Financial implications are discussed above. There are no policy implications at this stage. Recommendation 4 is likely to give rise to new policy considerations but they will be discussed as part of the proposed future paper.

**Legal Implications:** None directly arising from this report.

**Risk Assessment:** There is a risk to the Council if it does not engage with the Community Safety Partnership (which has MDDC and East Devon District Council member representation) in respect of failing to meet statutory duties. In turn, the ability of the partnership to provide effective partnership working to reduce crime and disorder in our community is potentially reduced and these recommendations reflect the positive role and impact that our elected members can have in respect of community safety issues.

**Equality Impact Assessment:** There are no policy recommendations as a result of this report or key decisions therefore no equality impact assessment is required. Nonetheless, it is helpful to recognise the CSP Plan and the wider purpose of the CSP itself is to help protect or support some of the most vulnerable persons in our community.

**Relationship to Corporate Plan:** [start text here and continue without indenting]

**Impact on Climate Change:** [start text here and continue without indenting]

## 1.0 Introduction/Background

1.1 The Community Policy Development Group had expressed a concern with Sexual Violence against Women and had formed the Working Group to look at the current priorities of the Community Safety Partnership (CSP) and how this looked to prevent harm to women and girls.

1.2 Two working group meetings were held, the first on 30 June 2021 and the second on 23 August 2021. Attendees from the PDG and members of the working group were:

Cllr M E Squires who was elected Chair,  
Cllr E M Andrews,  
Cllr C Collis,  
Cllr W Burke, and  
Cllr B Holdman.

1.3 Cllr D J Knowles also attended in his Cabinet lead capacity.

1.4 The group was supported by the following officers:

Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing, and  
Julia Ryder, Specialist Lead for Community Safety & Emergency Planning

## 2.0 **Current Community Safety Partnership Priorities**

2.1 Information relating to the current CSP priorities was provided and a discussion held to enable Members to understand the process of how these were identified and prioritised. This is based on gathering data from a wide range of agencies and a great deal of data relating to police logs and subsequent crimes recorded. There is also a significant link to the priorities within the Police & Crime Commissioners Police & Crime Plan.

2.2 The current, adopted 2021/22 CSP Priorities are as follows:

- Sexual Violence and Domestic Violence and Abuse
- Problem Drink and Drug Use
- Violent Crime
- Exploitation – Including online safety and modern slavery
- Youth Risk and Vulnerability

## 3.0 **Working Group considerations**

3.1 The Working Group recognised that these priorities will incorporate the impact of violence towards women and girls.

3.2 It was acknowledged that the current night time economy in Mid Devon was still re-establishing following the closures of pubs and nightclubs during the pandemic lockdown periods. It was noted by the Working Group that CCTV plays a significant role in supporting public safety during both the day and night times in Mid Devon Town Centres

3.3 Public access to the Tiverton Police Station in order to report issues was discussed and the indication that the Police & Crime Commissioner was investigating the opportunity to reopen the public access was investigated, with feedback that this is still a possibility in the longer-run.

3.3 During the pandemic support agencies and police have seen a significant rise in the number of victims coming forward to report sexual and domestic abuse and seek support. The new Domestic Abuse Act 2021 gives local authorities new responsibilities to protect victims by the provision of supported accommodation. Mid Devon is represented at the new Devon Domestic Abuse Partnership that is working to deliver these new responsibilities across Devon. A full report on safe accommodation was provided at the September PDG meeting.

3.4 It was discussed and acknowledged how much mental health, in all areas of society, have been impacted by the pandemic and mental health is a thread through many of the priority areas of the CSP work. Mental Health First Aid

Training is currently offered to MDDC staff and it was discussed how elected members could make positive use of this knowledge as part of their community liaison role if they also undertook the training.

- 3.5 The Working Group trialled receiving email updates on CSP priority related topics for a 6-week period. On reflection the Working Group felt that the topics were too wide-ranging and the volume of information too high to be of value on a continuous basis. It was felt a monthly or quarterly CSP summary update would be more beneficial to members.
- 3.6 The Working Group were informed of the close working relationship between the CSP and the Office of the Police and Crime Commissioner for Devon & Cornwall and were encouraged to provide feedback to the consultation for the new Police & Crime Plan that was at that point in time.
- 3.7 The Working Group were provided with information relating to Modern Slavery and the implications of this locally within Mid Devon. Consideration was given to the idea of a Modern Slavery Champion who would promote activities and information within the council and externally within communities. On reflection the Members felt that this was too big a role for an Elected Member to hold on top of their council commitments.
- 3.8 The Specialist Lead Community Safety & Emergency Planning explained that Community Safety Partnership aimed to be a 'trauma informed' group meaning that all staff involved would receive a minimum standard of training to enable awareness of past trauma when supporting and dealing with members of the public and staff. Trauma is often the underlying factor to physical and mental health issues, substance addiction, domestic abuse, violence and vulnerability to exploitation. This has significant impact on communication and socialisation skills and behaviours.
- 3.9 It was suggested that the Council could investigate becoming a recognised trauma informed council, the first in Devon. Plymouth is a trauma informed City and this could be taken as the base model, albeit recognising Plymouth is a unitary, upper-tier Local Authority with wider responsibilities. This would assist officers and members in becoming more empathetic to customers, communities and staff needs and enable better support to those that could benefit from improved understanding by service providers.

#### **4.0 Summary**

- 4.1 The initial purpose of the Working Group was to establish if there is further opportunity to develop and support Community Safety work with regard to the Safety of Women and Girls. The current priorities of the CSP incorporate work that broadly covers safety to all in communities. The Sexual Violence &

Domestic Violence and Abuse Forum hosted by the CSP does include projects to directly address violence towards women and girls.

- 4.2 New legislation from the Domestic Abuse Act 2021 and the forthcoming Serious Violence Duty will require local authorities and partner agencies to formulate partnership responses which will certainly impact on protecting women and girls in a positive way.
- 4.3 It was noted that resources, both staffing and financial, for the CSP are limited. From 2022/23 the Police & Crime Commissioner has withdrawn automatic funding for all CSPs in Devon & Cornwall. This means additional resource is required to formulate funding applications to the Office of the Police & Crime Commissioner or other funding sources in order to fund future project work supported by the CSP.

## 5.0 Recommendations from the Working Group

- 5.1 The following points are the recommendations from the Working Group to the PDG for consideration and approval.
1. That members have the opportunity to complete the Mental Health First Aid Training in order to enhance and support their community liaison role within communities
  2. That members have the opportunity to receive a regular Community Safety Partnership (CSP) quarterly updates to assist them keep abreast of current CSP themes, projects and achievements.
  3. Officers to provide members with a briefing on Modern Slavery with a local flavour by March 2022
  4. Members agree that that officers review Mid Devon District Council becoming a 'Trauma Informed Council' and potentially adopt a trauma informed approach to future service delivery, which may be based on the Plymouth Trauma Informed City model or other examples and provide a subsequent paper for members to review at its January meeting

**Contact for more Information:** Simon Newcombe, Corporate Manager for Public Health, Regulation and Housing [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk) or Cllr Margaret Squires, CPDG member and chair of the CPDG Community Safety Working Group [msquires@middevon.gov.uk](mailto:msquires@middevon.gov.uk)

### **Circulation of the Report:**

Cabinet Member for Community Well Being (Cllr Dennis Knowles)  
Members of the Community Policy Development Group  
All Leadership Team  
All Corporate Management Team  
All Operations Managers

### **List of Background Papers:**

More information on Plymouth City Council as a Trauma-informed Council is available here:

<https://www.plymouth.gov.uk/adultsandchildrensocialcare/childrensocialcare/academysocialworkplymouth/informationandresourcespractitioners/traumainformedpractice>

CSP Priorities Report 2021-2022 – Community Policy Development Group 23 March 2021



## COMMUNITY POLICY DEVELOPMENT GROUP 16TH NOVEMBER 2021

### **MEDIUM TERM FINANCIAL PLAN – General Fund (GF), Housing Revenue Account (HRA) and Capital Programme**

**Cabinet Member** Cllr Andrew Moore, Cabinet Member for Finance  
**Responsible Officer** Andrew Jarrett – Deputy Chief Executive (S151)

**Reason for Report:** To present to Members the updated Medium Term Financial Plan (MTFP) which covers the period 2022/23 to 2026/27 and options available in order for the Council to set a balanced budget.

**RECOMMENDATION:** Members note the updated MTFP's and feedback to Cabinet their recommendations for resolving the forecast budget shortfall.

**Relationship to Corporate Plan:** The Medium Term Financial Plan (MTFP) sets out the financial resources available to deliver the Council's ongoing Corporate Plan priorities.

**Financial Implications:** The implications of the revised budget gap are set out within the paper. Many areas require greater clarity, therefore a number of key assumptions underpin the reported position, which will be refined as greater clarity is received through the budget setting process.

**Budget and Policy Framework:** The Council has an annual legal requirement to set a balanced budget. The MTFP provides an overarching steer of what the Council can afford to deliver over a rolling five year period and is instrumental in setting the budgetary context for next year's budget setting process.

**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:** The MTFP makes a number of financial assumptions based on a sensible/prudent approach. The Council must ensure that the budget proposals are robust and achievable.

**Equality Impact Assessment:** No implications arising from this report.

**Climate Change Assessment:** Some provision has already been included in the base budget and further evaluation/consideration will be made as the draft budget process progresses. Significant investment is currently forecast within the Capital Programme, however this will be dependent upon full options appraisals and levels of Grant funding available.

- 1.1 The main purpose of the MTFP is to show how the Council will strategically manage its finances across the five year period 2022/23 to 2026/27 in order to support the delivery of the priorities detailed in the Corporate Plan. It collectively covers the General Fund, the Capital Programme and the Housing Revenue Account.
- 1.2 Members are referred to the MTFP report to 26 October 2021 Cabinet for greater detail. This report assumes that Members have read that report.
- 2.1 The starting base for the MTFP is the 2021/22 approved budget, which is then adjusted for any supplementary estimates approved by the Council or any significant budget variances identified in the monthly budget monitoring report to the Cabinet.
- 2.2 This base then has to be adjusted for unavoidable costs, such as, pay increases, inflation, service pressures associated with new legislation, a growing residential or business property base or improving performance, etc. The MTFP will also consider forecasts for investment receipts and income from fees and charges.
- 2.3 Finally the MTFP considers and makes assumptions regarding future levels of funding, in particular Council Tax including the potential growth in tax base, Business Rates again including any movement in the baseline as well as changes in the reliefs, multipliers and overall retention levels. Forecasts are also made for the likely level of future Central Government funding.
- 2.4 The key inflationary assumptions underpinning the General MTFP and an indication of their sensitivity to movements in the assumptions are:

<b>2022/23</b>	<b>Budget £k</b>	<b>Inflation Assumption %</b>	<b>2022/23 Forecast Financial Impact £k</b>	<b>1% Change £k</b>	<b>5% Change £k</b>
Staffing	12,660	3.75%*	475	127	633
NDR on Council Properties	703	1%	7	7	35
Gas	99	1%	1	1	5
Electric	293	1%	3	3	15
Water	148	1%	1	1	7
Members Allowances	323	3.75%*	12	3	16
Insurance	203	20%	41	2	10
Fuel	355	2%	7	4	18
Leisure Fees and Charges	(3,093)	3%	(93)	(31)	(155)
Support Service Recharge to HRA	(1,501)	3.75%*	(56)	(15)	(75)
<b>TOTAL</b>	<b>10,190</b>		<b>398</b>	<b>102</b>	<b>509</b>

2.5 The resulting forecast General Fund position is therefore:

2021/22		2022/23	2023/24	2024/25	2025/26	2026/27
£000		£000	£000	£000	£000	£000
11,870	<b>Expenditure</b>	11,651	11,612	11,909	12,041	12,335
(11,870)	<b>Funding</b>	(10,579)	(9,932)	(10,178)	(10,429)	(10,692)
0	<b>Annual Shortfall</b>	<b>1,072</b>	<b>607</b>	<b>52</b>	<b>(119)</b>	<b>30</b>
0	<b>Cumulative Shortfall</b>	<b>1,072</b>	<b>1,680</b>	<b>1,732</b>	<b>1,612</b>	<b>1,643</b>

2.6 There are still some fundamental issues that have not been resolved that may either improve or worsen the summary budget that can be summarised as follows:

- Impact of the Comprehensive Spending Review (SR21) and the Autumn Budget and their consequences for the Local Government Financial Settlement due in December;
- Changes to Central Government funding schemes including New Homes Bonus and Business Rate allocations/mechanics;
- Longer term implications of Covid-19
- Ongoing service reviews (including changes to fees and charges) as services look to improve the efficiency and effectiveness of their delivery.

2.7 The specific Service Units within the General Fund budget and the current projection of their 2022/23 budget is included within **Appendix 1**.

2.8 During the summer, Leadership Team and services have been reviewing a range of budget options that could be considered in order to help mitigate that remaining budget shortfall across the five years of this MTFP. This also includes some possible additional costs that could arise. These Budget Options can be found in **Appendix 2** and will form the basis of the Committee's discussions. In addition, the Committee is asked to identify further options to resolve the immediate budget gap for 2022/23 and future years.

3.1 The Capital Programme includes new bids for capital funding to support new programmes as well as 'rolling' items already highlighted in the current year's Capital Programme In February, Member's will be asked to approve the Year 1 programme and note the indicative future years.

3.2 The table below shows the capital funding position during the life of the MTFP:

## MTFP Capital Programme

2021/22		2022/23	2023/24	2024/25	2025/26	2026/27
£000		£000	£000	£000	£000	£000
	<b>General Fund:</b>					
10,755	<b>Capital Requirement</b>	25,158	38,293	17,013	14,050	7,574
	<b>Funded by:</b>					
2,094	Existing Funds	14,360	15,386	1,698	665	644
8,661	PWLB Borrowing	10,798	22,907	15,315	13,385	6,930
10,755	<b>Total Funding</b>	25,158	38,293	17,013	14,050	7,574
	<b>Housing Revenue Account:</b>					
6,950	<b>Capital Requirement</b>	29,462	19,930	17,790	21,830	17,100
	<b>Funded by:</b>					
3,733	Existing Funds	10,237	10,175	10,266	10,667	9,272
3,217	PWLB Borrowing	19,225	9,755	7,524	11,163	7,828
6,950	<b>Total Funding</b>	29,462	19,930	17,790	21,830	17,100
17,705	<b>Overall Capital Requirement</b>	54,620	58,223	34,803	35,880	24,674
17,705	<b>Overall Funding</b>	54,620	58,223	34,803	35,880	24,674

- 3.3 This forecast shows a marked increase in the borrowing requirement over the duration of the MTFP. This is largely due to a significant plan to increase the HRA Housing stock through the HRA and plans to fund housing developments through 3Rivers. Similarly, a number of bids are included that will help the Council deliver its commitment to climate change and reducing carbon emissions.
- 3.4 The specific schemes related to this committee are shown in **Appendix 3**.
- 3.5 The Committee is asked to review the bids and feedback to Cabinet any recommendations to increase/reduce them and any alternative options for Cabinet to consider.
- 4.1 The HRA is a ring-fenced account within Mid Devon's financial accounting system. This means that a balanced budget must be set each year including all income and expenditure pertinent to the Council's landlord function and excluding all other income and expenditure (since this would be captured as part of the General Fund budget).
- 4.2 Within the HRA MTFP assumptions have been included for inflation broadly in line with those included in the General Fund. In addition, funding is included to address costs arising from new legislation post Grenfell, the recommendations from the recent Fire Assessment Audit and Carbon reduction, the latter being offset by assumed external funding. A prudent assumption of a 3% rent increase has been applied in 2022/23 allowing for the ongoing impact of Covid-19 and economic constraints.

4.3 The draft HRA MTFP for 2022/23 to 2026/27 is summarised below:

2021/22		2022/23	2023/24	2024/25	2025/26	2026/27
£000		£000	£000	£000	£000	£000
7,059	Direct Expenditure	7,978	8,137	8,348	8,564	8,787
(13,218)	External Income	(13,576)	(14,247)	(14,824)	(15,692)	(16,273)
<b>(6,159)</b>	<b>Net Cost Of Services</b>	<b>(5,598)</b>	<b>(6,110)</b>	<b>(6,476)</b>	<b>(7,128)</b>	<b>(7,486)</b>
6,159	Indirect Expenditure	5,499	6,109	6,775	7,196	7,705
<b>0</b>	<b>Budget (Surplus) / Deficit</b>	<b>(99)</b>	<b>(1)</b>	<b>299</b>	<b>68</b>	<b>219</b>
<b>0</b>	<b>Cumulative (Surplus) / Deficit</b>	<b>(99)</b>	<b>(100)</b>	<b>199</b>	<b>267</b>	<b>486</b>

4.4 The full HRA HTFP can be found in **Appendix 4**.

4.5 There is a marked increase in the cost of Capital Financing reflecting the proposed investment in housing shown in the Capital Programme. Assumptions have been made on the opportunity to increase the number of units, the cost of these units, the timing of the build programme, and the impact on the HRA finances including debt financing and additional rental income generated based upon Social Rent.

4.6 Overall this shows that only the first two years of the forecast is able to generate a surplus and therefore contribute to the Housing Maintenance Fund (HMF). In the remaining years there is a deficit that needs to be addressed, rising to £486k if no remedial action is taken.

4.7 The Committee is asked to review the HRA MTFP and feedback to Cabinet any recommendations for Cabinet to consider.

5.1 Having a realistic financial plan for the next five years will enable the Council to ensure it is allocating its limited financial resources to its key priorities. The current Corporate Plan sets out the Council's goals/objectives and must clearly be matched by the financial resources that are available.

5.2 Members of the committee are invited to review the financial position and recommend to Cabinet ongoing options that might address the forecast budget shortfalls.

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

Paul Deal  
Corporate Manager for Financial Services  
[pdeal@middevon.gov.uk](mailto:pdeal@middevon.gov.uk)

**Circulation of the Report:** Cabinet, Cllr Andrew Moore, Leadership Team

This page is intentionally left blank

## PDG SERVICE UNIT MOVEMENTS

Service Unit	Direct Costs Detail	2021/2022 Annual Budget £	Reversal of One-off Adjustments £	Add Back Covid-19 Income £	Inflation £	2022/2023 Forecast Budget £	Movement £	+/- %
<b>Cabinet</b>								
SCM01	Leadership Team	406,590			14,776	421,366	14,776	4%
SCM02	Corporate Functions	95,740			3,491	99,231	3,491	4%
SCM03	Corporate Fees	152,450			712	153,162	712	0%
SCM06	Pension Backfunding	779,690			-	779,690	-	0%
SES01	Emergency Planning	8,150			-	8,150	-	0%
SFP01	Accountancy Services	533,720			15,277	548,997	15,277	3%
SFP02	Internal Audit	94,410			-	94,410	-	0%
SFP03	Procurement	113,470			3,883	117,353	3,883	3%
SFP04	Purchase Ledger	45,840			1,640	47,480	1,640	4%
SFP05	Sales Ledger	44,770			1,640	46,410	1,640	4%
SHR01	Human Resources	387,360			12,989	400,349	12,989	3%
SHR02	MDDC Staff Training	29,870			-	29,870	-	0%
SHR03	Payroll	36,370			1,364	37,734	1,364	4%
SHR04	Learning And Development	47,500			1,402	48,902	1,402	3%
SIT01	It Gazetteer Management	70,500			2,514	73,014	2,514	4%
SIT03	It Information Technology	968,430			20,744	989,172	20,742	2%
SLD01	Electoral Registration	230,820	(45,000)		4,034	189,854	(40,966)	-18%
SLD02	Democratic Rep And Management	504,460			16,954	521,414	16,954	3%
SLD04	Legal Services	368,503			12,724	381,227	12,724	3%
SPR01	Building Regulations	59,430		(44,000)	8,258	23,688	(35,742)	-60%
SPR04	Local Land Charges	(16,970)		(1,500)	27,053	8,583	25,553	-151%
SRB01	Collection Of Council Tax	442,380			14,135	456,515	14,135	3%
SRB02	Collection Of Business Rates	(105,380)			18	(105,362)	18	0%
SRB03	Housing Benefit Admin & Fraud	126,270	(9,960)		9,330	125,640	(630)	0%
SRB04	Housing Benefit Subsidy	65,000			-	65,000	-	0%
SRB06	Debt Recovery	71,810			2,638	74,448	2,638	4%
<b>TOTAL CABINET PDG</b>		<b>5,561,183</b>	<b>(54,960)</b>	<b>(45,500)</b>	<b>175,573</b>	<b>5,636,294</b>	<b>75,111</b>	<b>1%</b>
<b>Community PDG</b>								
SCD01	Community Development	138,500	15,560		-	154,060	15,560	11%
SCS20	Customer Services Admin	23,350			-	23,350	-	0%
SCS22	Customer First	751,010			26,242	777,252	26,242	3%
SES03	Community Safety - C.C.T.V.	45,200			38	45,238	38	0%
SES04	Public Health	3,990			-	3,990	-	0%
SES11	Pool Cars	280			637	917	637	228%
SES16	Es Staff Units/Recharges	750,610			26,030	776,640	26,030	3%
SES17	Community Safety	6,220			-	6,220	-	0%
SES18	Food Safety	(24,200)			414	(23,786)	414	-2%
SES21	Licensing	48,480		(30,340)	5,120	23,260	(25,220)	-52%
SES22	Pest Control	5,000			-	5,000	-	0%
SES23	Pollution Reduction	(580)			414	(166)	414	-71%
SPR02	Enforcement	91,780			3,023	94,803	3,023	3%
SPR03	Development Control	825,420	(355,753)	(129,650)	35,860	375,877	(449,543)	-54%
SPR09	Forward Planning	263,550			-	263,550	-	0%
SPR11	Regional Planning	249,903		(1,800)	-	248,103	(1,800)	-1%
SR01	Recreation And Sport	906,999		(464,687)	(10,025)	432,287	(474,712)	-52%
<b>TOTAL COMMUNITY PDG</b>		<b>4,085,512</b>	<b>(340,193)</b>	<b>(626,477)</b>	<b>87,753</b>	<b>3,206,595</b>	<b>(878,917)</b>	<b>-22%</b>
<b>Economy PDG</b>								
SCD02	Economic Development	79,420		(6,910)	3,977	76,487	(2,933)	-4%
SCP01	Parking Services	(529,250)		95,000	3,065	(431,185)	98,065	-19%
SPR06	Economic Development	552,360	(34,000)		-	518,360	(34,000)	-6%
SPS12	Gf Properties Shops/Flats	(401,060)			1,297	(399,764)	1,297	0%
<b>TOTAL ECONOMY PDG</b>		<b>(298,530)</b>	<b>(34,000)</b>	<b>88,090</b>	<b>8,339</b>	<b>(236,101)</b>	<b>62,429</b>	<b>-21%</b>
<b>Environment PDG</b>								
SES02	Cemeteries	(62,630)			1,234	(61,396)	1,234	-2%
SES05	Open Spaces	200,854			493	201,347	493	0%
SGM01	Grounds Maintenance	555,436			22,001	577,437	22,001	4%
SPS01	Asset Management	40,000			-	40,000	-	0%
SPS03	Flood Defence And Land Drain	26,430			-	26,430	-	0%
SPS04	Street Naming & Numbering	7,810			236	8,046	236	3%
SPS05	Administration Buildings	262,420			3,392	265,812	3,392	1%
SPS06	MDDC Depots	74,990			957	75,947	957	1%
SPS07	Public Transport	(15,280)			168	(15,112)	168	-1%
SPS09	Property Services Staff Unit	738,890			26,631	765,521	26,631	4%
SPS11	Public Conveniences	63,980			838	64,818	838	1%
SWS01	Street Cleansing	420,440			14,294	434,734	14,294	3%
SWS02	Waste Collection	229,459	75,000	(19,000)	40,382	325,841	96,382	42%
SWS03	Recycling	1,017,000	(60,000)	(167,530)	46,818	836,288	(180,712)	-18%
SWS04	Waste Management	366,440			11,482	377,922	11,482	3%
<b>TOTAL ENVIRONMENT PDG</b>		<b>3,926,239</b>	<b>15,000</b>	<b>(186,530)</b>	<b>168,925</b>	<b>3,923,634</b>	<b>(2,605)</b>	<b>0%</b>
<b>Homes PDG</b>								
SES15	Private Sector Housing Grants	(3,630)			-	(3,630)	-	0%
SHG03	Homelessness Accommodation	396,640	(66,850)		13,707	343,497	(53,143)	-13%
<b>TOTAL HOMES PDG</b>		<b>393,010</b>	<b>(66,850)</b>	<b>0</b>	<b>13,707</b>	<b>339,867</b>	<b>(53,143)</b>	<b>-14%</b>
<b>GRAND TOTAL</b>		<b>13,667,414</b>	<b>(481,003)</b>	<b>(770,417)</b>	<b>454,295</b>	<b>12,870,287</b>	<b>(797,127)</b>	<b>-6%</b>

This page is intentionally left blank



**Mid Devon District Council - Medium Term Financial Plan**

Description	Budget Gap					TOTAL £	
	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £		
v1 Annual Budget Shortfall	1,332,295	604,197	49,238	(122,368)	27,276	<b>1,890,638</b>	
v2 Inclusion of 60% of 3R interest charges	(180,000)		60,000	(120,000)	60,000	<b>(180,000)</b>	
v2 Inclusion of GP Surgery loan interest	(80,000)	3,000	3,000	3,000	3,000	<b>(68,000)</b>	
<b>v2 CURRENT BUDGET GAP</b>	<b>1,072,295</b>	<b>607,197</b>	<b>112,238</b>	<b>(239,368)</b>	<b>90,276</b>	<b>1,642,638</b>	
<b>v2 Cumulative Budget Shortfall</b>	<b>1,072,295</b>	<b>1,679,492</b>	<b>1,791,730</b>	<b>1,552,362</b>	<b>1,642,638</b>		

**Budget Options to address the MTFP Budget Gap**

Previous Options	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £	TOTAL £	PDG Committee
1 Recruitment freeze / 12 month ban on filling any vacancies unless proof that the service would fall below legal minimum level	(75,000)	(50,000)	(50,000)	0	0	<b>(175,000)</b>	<b>ALL</b>
2 Leisure centres. Additional income above general inflation increase based upon new capital expenditure	0		(50,000)	0	0	<b>(50,000)</b>	<b>Community</b>
3 Reduce waste collections to encourage more recycling	0	(136,000)	(75,000)	0	0	<b>(211,000)</b>	<b>Environment</b>
4 Close Public Toilets - Market Sq Crediton, TTC complete ownership of PC, Down St Mary remodel?	(25,000)	(25,000)	0	0	0	<b>(50,000)</b>	<b>Economy</b>
5 Review agency spend and look at why we need to rely on agencies/do things differently	(50,000)	0	0	0	0	<b>(50,000)</b>	<b>ALL</b>
6 Review Court Costs - Amount/Process - Also Recovery to pre COVID levels	(38,000)	0	0	0	0	<b>(38,000)</b>	<b>Homes</b>
7 Phoenix House – sublet office space; creating hot desk areas combined with WFH becoming the normal working practice	0	(30,000)	(50,000)	0	0	<b>(80,000)</b>	<b>Environment</b>
8 Invest in our own hydro scheme	0	0	(49,000)	0	0	<b>(49,000)</b>	<b>Environment</b>
9 Move staff out of Old Road, GF purchase building and lease back to HRA until decommissioned	0	(38,000)	0	0	0	<b>(38,000)</b>	<b>Environment</b>
10 Reduce grants to charitable organisations, other than those who support our statutory obligations	(13,000)	(13,000)	0	0	0	<b>(26,000)</b>	<b>Community</b>
	<b>(201,000)</b>	<b>(292,000)</b>	<b>(274,000)</b>	<b>0</b>	<b>0</b>	<b>(767,000)</b>	

**New Options to be review / worked up**

Ref Description	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £	TOTAL £	PDG Committee
<b>1 Funding</b>							
a Council Tax Collection Fund gain (one-off)	(200,000)	200,000	0	0	0	0	Economy
b Council Tax Recovery/Growth - refine assumptions	£???	£???	£???	£???	£???	0	Economy
c Business Rates Collection Fund gain	(100,000)	100,000	0	0	0	0	Economy
d Business Rates Recovery/Growth - refine assumptions (particularly retention/reset)	(100,000)	£???	£???	£???	£???	(100,000)	Economy
e Future Business Rates Growth - both Costs and Income in relation to: Hitchcotts (30%), J27, J28, EUE, North Western Cullompton Expansion, Hartnells etc	0	(200,000)	(100,000)	(100,000)	(100,000)	(500,000)	Economy
f Continuation of Lower Tier Services Grant	£???	£???	£???	£???	£???	0	Not Applicable
g Finalisation of New Homes Bonus - possible supplementary payment - new replacement scheme	£???	£???	£???	£???	£???	0	Not Applicable
h Implications of Fair Funding Review - possible new grant funding - removal of Negative RSG - Potential exposure to Business Rates rebasing	(180,000)	200,000	100,000	£???	£???	120,000	Not Applicable
i1 3 Rivers Returns - increased Interest above that already built in	(140,000)	150,000	(50,000)	10,000	160,000	130,000	Homes
i2 3 Rivers Returns - Dividend Payments	0	0	(250,000)	£???	£???	(250,000)	Homes
j GP Surgery Loan - Phase 2	0	0	(80,000)	0	0	(80,000)	Economy
	<b>(720,000)</b>	<b>450,000</b>	<b>(380,000)</b>	<b>(90,000)</b>	<b>60,000</b>	<b>(680,000)</b>	

Ref Description	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £	TOTAL £	PDG Committee
<b>2 Transformation</b>							
a Decarbonisation Savings	(40,000)	£???	£???	£???	£???	(40,000)	Environment
b Property Rationalisation - savings on overheads - Play Parks ?? - Amenity Car Parks??	£???	£???	£???	£???	£???	0	Environment
c Digital Transformation - Costs and Savings	(30,000)	(60,000)	(30,000)	0	0	(120,000)	Community
d HIF Projects - Base position reflects £18m Grants - Additional pressures i.e. interest etc (hopefully offset by Levelling Up Bid)	£???	£???	£???	£???	£???	0	Community
e Harlequin Valet - receipt from sale of asset (possible £100k one-off - use in-year or next year?)	£???	0	0	0	0	0	Not Applicable
f NET Reduced costs as outcome of "hybrid working" - Reduced travel costs - Greater Productivity - Additional IT Costs	£???	£???	£???	£???	£???	0	ALL
	<b>(70,000)</b>	<b>(60,000)</b>	<b>(30,000)</b>	<b>0</b>	<b>0</b>	<b>(160,000)</b>	

Ref Description	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £	TOTAL £	PDG Committee
<b>3 Other Savings?</b>							
a Review Fees and Charges - Green / Trade Waste - Discretionary elements of Licensing / Planning - Car Park Fees	(50,000)	£???	£???	£???	£???	(50,000)	ALL
b Additional implications of CRF and Levelling up Bids	£???	£???	£???	£???	£???	0	Community
c Review HRA Recharges - refine further	(5,000)	£???	£???	£???	£???	(5,000)	Homes
d Reduce Corporate Subscriptions / Fees	£???	£???	£???	£???	£???	0	ALL
e Commercialise Services	£???	£???	£???	£???	£???	0	ALL
f Increase subscriptions to Piper Alarms	£???	£???	£???	£???	£???	0	Homes
g Outsource Homelessness provision - reduced admin costs	£???	£???	£???	£???	£???	0	Homes
h Refine Inflation Assumptions - Services to "consume their own smoke"	£???	£???	£???	£???	£???	0	ALL
	<b>(55,000)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(55,000)</b>	

Ref Description	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £	TOTAL £	PDG Committee
<b>4 Possible Costs</b>							
a Climate Change Commitment Implications (over and above associated grant funding)	50,000	50,000	50,000	50,000	50,000	250,000	Environment
b Cyber Security - Insurance premium - Costs arising from Audit recommendations	20,000	£???	£???	£???	£???	20,000	Not Applicable
c CCTV - additional spend?	£???	£???	£???	£???	£???	0	Economy
d1 SFS Leasing Contract - Maintenance costs	30,000	30,000	30,000	30,000	30,000	150,000	Environment
d2 SFS Leasing Contract - Lease costs	65,000	15,000	15,000	15,000	15,000	125,000	Environment
e Additional implications of CRF and Levelling up Bids	£???	£???	£???	£???	£???	0	Community
f Stop sharing Transport Manager post with Exeter City Council	20,000	0	0	0	0	20,000	Environment
g Contributions for bedding from Town Councils - ceased	13,000	0	0	0	0	13,000	Community
h Increase in asset maintenance programme	50,000	£???	£???	£???	£???	50,000	Environment
i Increased Audit Fees under new procurement framework	20,000	20,000	£???	£???	£???	40,000	Not Applicable
j Increased Pension Deficit - Higher Back Funding requirement - Higher contribution rates	0	100,000	0	0	100,000	200,000	Not Applicable
k Carlu Close - possible increase in Rental payment - possible reduced utilities	30,000	0	0	0	0	30,000	Environment
l1 Updated Capital Programme - GF revenue implications - Interest	54,000	174,000	(3,000)	(101,000)	(98,000)	26,000	ALL
l2 Updated Capital Programme - GF revenue implications - Minimum Revenue Provision (MRP)	0	45,000	383,000	107,000	63,000	598,000	ALL
m Additional cost implications of Recruitment and Retention pressure	100,000	0	0	0	0	100,000	ALL
n Loss of NHB (capital contribution) - Adequate property maintenance	100,000	100,000	100,000	100,000	100,000	500,000	Not Applicable
	<b>552,000</b>	<b>534,000</b>	<b>575,000</b>	<b>201,000</b>	<b>260,000</b>	<b>2,122,000</b>	

Ref Description	2022/23 £	2023/24 £	2024/25 £	2025/26 £	2026/27 £	TOTAL £	PDG Committee
<b>5 Longer Term Decisions / Tough Choices</b>							
a Reduce Service Provision - Reduce standard - Cease provision	£???	(150,000)	(200,000)	£???	£???	(350,000)	ALL
d Further Commercial Activity	£???	£???	£???	£???	£???	0	Economy
	0	(150,000)	(200,000)	0	0	(350,000)	
<b>Potential MTFP Position</b>	<b>578,295</b>	<b>1,089,197</b>	<b>(196,762)</b>	<b>(128,368)</b>	<b>410,276</b>	<b>1,752,638</b>	
<b>Notes:</b>							
<b>6 Reserves</b>							
a General Fund - 10% above minimum							
b Reallocate NHB - £3m earmarked to support Capital - could be used for Revenue instead							
c Reallocate Other Earmarked Reserves - £15m+ excluding NNDR S31 Grant							
<b>7 Other Issues</b>							
a National changes to waste collection services							
b Ability for planning to be break even							
c No inclusion of National Insurance increase contributions as assumed fully funded							
<b>8 Other Considerations</b>							
a DC Elections May 2023							
b Financial implications from recent petition for referendum on democratic system (c.£300k)							

This page is intentionally left blank

## CAPITAL PROGRAMME - Medium Term Financial Plan 2022/23 - 2026/27

PDG Committee		Estimated Capital Programme 2022/23 £k	Estimated Capital Programme 2023/24 £k	Estimated Capital Programme 2024/25 £k	Estimated Capital Programme 2025/26 £k	Estimated Capital Programme 2026/27 £k	Total £k	Notes
	<b>General Fund Estates Management</b>							
	<b>Lords Meadow Leisure Centre</b>							
Community	Dance Studio space challenge (Relocation of dance studio)		902				902	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
Community	Fitness Studio renewal of equipment		150				150	
Community	ATP surface replacement		150				150	
Community	Spin Bikes		24				24	
	<b>Exe Valley Leisure Centre</b>							
Community	ATP replacement (50% share with DCC)				150		150	50% Funded by DCC
Community	Spin Bikes		32				32	
	<b>Culm Valley sports centre</b>							
Community	Remodelling dance studio		153				153	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
Community	ATP replacement (50% share with DCC)			150			150	50% Funded by DCC
Community	Ceiling - asset review	260					260	
Community	Fitness Studio renewal of equipment			150			150	
Community	Spin Bikes		24				24	
	<b>Leisure - Climate Change-Net Zero Target (incl heat- decarbonisation)</b>							
Environment	EVLC - Boilers & CHP					80	80	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	EVLC - Air Source Heat Pumps				420		420	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	EVLC - Solar Car Park Cover					390	390	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	EVLC -Ground Source Heat Pumps					520	520	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	EVLC - Building Fabric - Insulation improvements				350		350	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	LMLC -Solar Car Park Cover		640				640	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	LMLC -Ground Source Heat Pump -(for whole site)				170		170	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	LMLC - Building Fabric -insulation improvements					350	350	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	CVSC - Biomass Boiler installation			160			160	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	CVSC -Air Source Heat Pump				170		170	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	CVSC -Ground Source Heat Pumps					220	220	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
Environment	CVSC -Building Fabric -Insulation improvements				200		200	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
	<b>Total Leisure</b>	<b>260</b>	<b>2,075</b>	<b>460</b>	<b>1,460</b>	<b>1,560</b>	<b>5,815</b>	
	<b>Other MDDC Buildings</b>							
Environment	Cemetery Lodge - Structural solution for damp	62					62	
	<b>Phoenix House</b>							
Environment	Cooling options Air Handling Unit			150			150	
Environment	Phoenix House - Air Source Heat Pumps and ducting			450			450	Subject to acceptable Business Case/Financial appraisal and success of External/Salix funding bids
	<b>General Car parks</b>							
Environment	MSCP -Solar carport and additional security					370	370	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
	<b>MDDC Depot sites</b>							
Environment	Depot Design & Build - Waste & Recycling	250	3,500				3,750	Subject to identification of appropriate site
Environment	Recycling Baler replacement			480			480	
	<b>MDDC Shops/industrial Units</b>							
Economy	36 & 38 Fore Street including Flat above structure & cosmetic works	250					250	This is in addition to the £47k identified in 2021/22.

PDG Committee		Estimated Capital Programme 2022/23 £k	Estimated Capital Programme 2023/24 £k	Estimated Capital Programme 2024/25 £k	Estimated Capital Programme 2025/26 £k	Estimated Capital Programme 2026/27 £k	Total £k	Notes
	<b>Parks &amp; Play Areas</b>							
Environment	Amory Park - Hard Court Area		64				64	
Environment	Play Area's - schemes tbc		50	50		50	150	
	<b>Public Conveniences</b>							
Environment	Phoenix Lane Toilets - new construction in fresh position - funding options to be pursued	125					125	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
Environment	Westexe Rec Toilets - Replacement		159				159	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
	<b>Other Projects</b>							
Environment	Hydromills Electricity generation Project - Tiverton Weir	420					420	Funding options to be explored - subject to acceptable Business Case/Financial appraisal. This is in addition to £800k identified in 2021/22 that is forecast to slip into 2022/23.
Economy	Tiverton Market Paving - Permanent Solution		150				150	
	<b>Total Other</b>	<b>1,107</b>	<b>3,923</b>	<b>1,130</b>	<b>0</b>	<b>420</b>	<b>6,580</b>	
	<b>HIF Schemes</b>							
Economy	Cullompton Town Centre Relief Road (HIF bid)	8,414	11,038	597			20,049	Revised Project costs/funding have been incorporated per Cabinet Report 03/08/21 and latest forecast from DCC (July 2021). Revised total project costs £24.9m. 'Levelling Up' funding bid has been submitted for £13.6m, if successful this funding will be used to partially fund costs in this forward looking MTFP but also budgeted costs in 2021/22 (which depending on the speed in which this project progresses may slip into 2022/23). Total project costs in this plan take into account monies already spent in 2019/20 & 2020/21 and the budgeted spend in 2021/22 Capital Programme.
Economy	Tiverton EUE A361 Junction Phase 2 (HIF bid)	4,640	5,100				9,740	Additional £1.9m projected costs assumed in 2023/24 per Cabinet Report 03/08/21 (Total revised project forecast £10.1m). At this stage for illustrative purposes to be funded by borrowing until tendering process complete and revised report brought back to Cabinet regarding delivery contract and associated funding and revised estimated profile of spend.
	<b>Total HIF Schemes</b>	<b>13,054</b>	<b>16,138</b>	<b>597</b>	<b>0</b>	<b>0</b>	<b>29,789</b>	
	<b>ICT Projects</b>							
Not Applicable	Laptop/desktop refresh	50					50	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Workstation refresh		50				50	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Secure WIFI Replacement	50					50	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Server hardware/software Citrix Replacement	40					40	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	MS365 Licensing	100	100	100			300	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Multi-Factor Authentication	20					20	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Sophos Security Software	30					30	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Cyber/Veeam Backup Software/Disaster Recovery	80					80	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Uninterruptible Power Supply Refresh			20			20	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	VM/Storage Area Network			120			120	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
	<b>Other ICT Service related projects</b>							
Not Applicable	Replacement Access Database - Property Services	100					100	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Replacement HR Data base	80					80	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
Not Applicable	Leisure management project- System hardware/ software	150					150	Further consideration required as to whether Projects classified in Capital or Revenue; this will be undertaken during the budget process.
	<b>Total ICT</b>	<b>700</b>	<b>150</b>	<b>240</b>	<b>0</b>	<b>0</b>	<b>1,090</b>	



PDG Committee		Estimated Capital Programme 2022/23 £k	Estimated Capital Programme 2023/24 £k	Estimated Capital Programme 2024/25 £k	Estimated Capital Programme 2025/26 £k	Estimated Capital Programme 2026/27 £k	Total £k	Notes
	<b>Private Sector Housing Grants</b>							
Homes	Disabled Facilities Grants-P/Sector	577	581	586	590	594	2,928	
	<b>Total PSH Grants</b>	<b>577</b>	<b>581</b>	<b>586</b>	<b>590</b>	<b>594</b>	<b>2,928</b>	
	<b>TOTAL GF PROJECTS</b>	<b>15,698</b>	<b>22,867</b>	<b>3,013</b>	<b>2,050</b>	<b>2,574</b>	<b>46,202</b>	
	<b>Other General Fund Development Projects</b>							
Homes	3 Rivers Scheme - Bampton	1,206					1,206	Linked to 3 Rivers Business Plan V10
Homes	3 Rivers Scheme - Riverside Development (rear of Town Hall) Tiverton	356					356	Linked to 3 Rivers Business Plan V10
Homes	* 3 Rivers scheme - Knowle Lane, Cullompton (note slippage from 2020/21 will fund planned spend in 2021/22)	1,298	1,426				2,724	Linked to 3 Rivers Business Plan V10
Homes	* 3 Rivers Schemes - Future Projects	4,800	11,500	14,000	12,000	5,000	47,300	Linked to 3 Rivers Business Plan V10
	* These schemes require signed loan agreements before they can be progressed further							
Economy	Park Road (Delivery of this project is yet to be determined until conclusion of marketing exercise & therefore maybe a Capital Receipt)	1,300					1,300	
Economy	Regeneration Project 1		2,500				2,500	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
Economy	Regeneration Project 2	500					500	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
	<b>TOTAL GF OTHER DEVELOPMENT PROJECTS</b>	<b>9,460</b>	<b>15,426</b>	<b>14,000</b>	<b>12,000</b>	<b>5,000</b>	<b>55,886</b>	
	<b>GRAND TOTAL GF PROJECTS</b>	<b>25,158</b>	<b>38,293</b>	<b>17,013</b>	<b>14,050</b>	<b>7,574</b>	<b>102,088</b>	

PDG Committee		Estimated Capital Programme 2022/23 £k	Estimated Capital Programme 2023/24 £k	Estimated Capital Programme 2024/25 £k	Estimated Capital Programme 2025/26 £k	Estimated Capital Programme 2026/27 £k	Total £k	Notes
	<b>HRA Projects</b>							
	<b>Existing Housing Stock</b>							
Homes	Major repairs to Housing Stock	2,255	2,240	2,260	2,280	2,300	11,335	
Homes	*Renewable Energy Fund	250	250	250	250	250	1,250	
Homes	Home Adaptations - Disabled Facilities	300	300	300	300	300	1,500	
	* 22/23 & 23/24 are dependent on SHDF Funding bid in 21/22 - if successful this spend will be b/fwd to 21/22							
	<b>** Housing Schemes (1:4:1 Receipt) Projects</b>							
Homes	Housing Scheme - Project 1	35						Subject to acceptable Business Case/Financial appraisal - 40% Funded through 1:4:1 Monies, additional 35 funding options to be explored
Homes	Housing Scheme - Project 2	130						Subject to acceptable Business Case/Financial appraisal - 40% Funded through 1:4:1 Monies, additional 130 funding options to be explored
Homes	Housing Scheme - Project 3	750						Subject to acceptable Business Case/Financial appraisal - 40% Funded through 1:4:1 Monies, additional 750 funding options to be explored
Homes	Future Housing schemes - 1:4:1 Projects		140	430	2,400			Subject to acceptable Business Case/Financial appraisal - 40% Funded through 1:4:1 Monies, additional 2,970 funding options to be explored
Homes	Affordable Housing/ Purchase of ex RTB	400	400	400	400	400	2,000	Subject to acceptable Business Case/Financial appraisal - 40% Funded through 1:4:1 Monies, additional 2,000 funding options to be explored
	<b>** Housing Development Schemes</b>							
Homes	Housing Scheme - Project 9	1300						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,300 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 10	1300						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,300 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 11	1500						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,500 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 12	1500						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,500 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 13	1100						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,100 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 14	800						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 800 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 15	4600						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 4,600 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 16	900						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 900 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 17	1000						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,000 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 18	900						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 900 respect of additional units created, additional funding options to be explored
Homes	Housing Scheme - Project 19	1400						Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in 1,400 respect of additional units created, additional funding options to be explored
Homes	Future Housing development Schemes		14000	13900	16100	13800	57,800	Subject to acceptable Business Case/Financial appraisal - Assumed 45% Homes England Funding in respect of additional units created, additional funding options to be explored
	<b>** Proposed Council House 1:4:1 &amp; Housing Development schemes subject to full appraisal</b>							
Homes	Westexe - Structural Communal area work (stairwells, steps)	100	350					450 Funding options to be explored - subject to acceptable Business Case/Financial appraisal
Homes	Garages Block - Redevelopment	92						92 This is in addition to the £408k identified in 2021/22, the majority of which is projected to slip into 2022/23
Homes	Post Hill, Tiverton	8,800	2,200					Original timescales/costs have been assumed - subject to scheduling of delivery provider. Planning application to be submitted Jan/Feb 2022
Homes	Old Road Depot remodelling options - forecast expenditure to maintain operations	50	50	250	100	50	500	Assumed Costs to keep building operational
	<b>GRAND TOTAL HRA PROJECTS</b>	<b>29,462</b>	<b>19,930</b>	<b>17,790</b>	<b>21,830</b>	<b>17,100</b>	<b>106,112</b>	
	<b>GRAND TOTAL GF + HRA Projects</b>	<b>54,620</b>	<b>58,223</b>	<b>34,803</b>	<b>35,880</b>	<b>24,674</b>	<b>208,200</b>	

PDG Committee	Estimated Capital Programme 2022/23 £k	Estimated Capital Programme 2023/24 £k	Estimated Capital Programme 2024/25 £k	Estimated Capital Programme 2025/26 £k	Estimated Capital Programme 2026/27 £k	Total £k	Notes
<b>FUNDING</b>							
<b>MDDC Funding Summary</b>							
<b>General Fund</b>							
<b>EXISTING FUNDS</b>	<b>2022/23 £k</b>	<b>2023/24 £k</b>	<b>2024/25 £k</b>	<b>2025/26 £k</b>	<b>2026/27 £k</b>	<b>Total £k</b>	
Capital Grants Unapplied Reserve	577	581	661	665	594	3,078	
Capital Receipts Reserve	130	130	65	0	0	325	
NHB Funding	181	237	110	0	50	578	
Other Earmarked Reserves	418	200	265	0	0	883	
HIF Funding (Tiverton & Cullompton schemes)	6,465	10,550	0	0	0	17,015	
Levelling Up funding bid (Cullompton Relief Road Project)	6,436	3,438	0	0	0	9,874	
DCC Funding (Cullompton Relief Road Project)	153	250	597	0	0	1,000	
<b>Subtotal</b>	<b>14,360</b>	<b>15,386</b>	<b>1,698</b>	<b>665</b>	<b>644</b>	<b>32,753</b>	
<b>NEW FUNDS</b>							
PWLB Borrowing (50 years)	750	6,000	0	0	0	6,750	
PWLB Borrowing (25 years)	758	1,851	610	1,310	1,930	6,459	
PWLB Borrowing (10 years)	330	0	555	75	0	960	
PWLB Borrowing (5 years)	0	230	150	0	0	380	
PWLB Borrowing (3 years)	8,960	12,926	14,000	12,000	5,000	52,886	
Tiverton HIF Scheme - Assumed funded through borrowing from Public Works Loan Board		1,900				1,900	Funding options to be explored - subject to acceptable Business Case/Financial appraisal
<b>Subtotal</b>	<b>10,798</b>	<b>22,907</b>	<b>15,315</b>	<b>13,385</b>	<b>6,930</b>	<b>69,335</b>	
<b>Total General Fund Funding</b>	<b>25,158</b>	<b>38,293</b>	<b>17,013</b>	<b>14,050</b>	<b>7,574</b>	<b>102,088</b>	
<b>Housing Revenue Account</b>							
<b>EXISTING FUNDS</b>	<b>2022/23 £k</b>	<b>2023/24 £k</b>	<b>2024/25 £k</b>	<b>2025/26 £k</b>	<b>2026/27 £k</b>	<b>Total £k</b>	
Homes England Funding	5,862	6,300	6,255	5,848	5,393	29,658	
Capital Grants Unapplied Reserve	170	168	168	168	168	842	
Capital Receipts Reserve	1,380	1,071	1,187	1,975	1,015	6,628	
NHB Funding	21	21	21	21	21	105	
HRA Housing Maintenance Fund	0	0	0	0	0	0	
Other Housing Earmarked Reserves	2,804	2,615	2,635	2,655	2,675	13,384	
<b>Subtotal</b>	<b>10,237</b>	<b>10,175</b>	<b>10,266</b>	<b>10,667</b>	<b>9,272</b>	<b>50,617</b>	
<b>NEW FUNDS</b>	<b>2022/23 £k</b>	<b>2023/24 £k</b>	<b>2024/25 £k</b>	<b>2025/26 £k</b>	<b>2026/27 £k</b>	<b>Total £k</b>	
PWLB Borrowing (50 years)	19,225	9,755	7,524	11,163	7,828	55,495	
<b>Subtotal</b>	<b>19,225</b>	<b>9,755</b>	<b>7,524</b>	<b>11,163</b>	<b>7,828</b>	<b>55,495</b>	
<b>Total Housing Revenue Account Funding</b>	<b>29,462</b>	<b>19,930</b>	<b>17,790</b>	<b>21,830</b>	<b>17,100</b>	<b>106,112</b>	
<b>TOTAL FUNDING</b>	<b>54,620</b>	<b>58,223</b>	<b>34,803</b>	<b>35,880</b>	<b>24,674</b>	<b>208,200</b>	

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank



## COMMUNITY PDG WORKPLAN 2021-2022 - 2021 TO 2022

Meeting Date	Agenda Item	Theme	Officer Responsible	Comments
<b>20th December 2021</b>				
20.12.21 4.01.22	<b>Strategic Grants</b> To receive a report from Community PDG Grants Working Group on the Strategic Grants Programme 2022-2023.		John Bodley-Scott	
<b>25th January 2022</b>				
25.01.22 14.02.22	<b>Single Equalities Policy and Equality Objective</b> To receive the annual review of the Single Equalities Policy and Equality Objective		Catherine Yandle	
25.01.22 08.02.22	<b>Health and Safety Policy</b> To receive the annual review of the Health & Safety Policy		Catherine Yandle	
25.01.22	<b>Community Safety Partnership</b> To agree the Action Plan for 2022-2023		Simon Newcombe	
25.01.22 14.02.22 10.03.22	<b>Regulation of Investigatory Powers</b> To receive the annual update of Regulation of Investigatory Powers		Karen Trickey	
25.01.22	Budget		Andrew Jarrett	

Meeting Date	Agenda Item	Theme	Officer Responsible	Comments
25.01.22	<b>6 month Leisure update</b> To receive a verbal update from the Leisure Manager		Lee Chester	
25.01.22	<b>Work Plan</b> To receive the current work plan for the Community PDG.  Members to agree and discuss additional items that they would like added to the Work plan		Clare Robathan	
Page 16 22nd March 2022				
22.03.22 7.04.22	<b>Town and Parish Charter</b> To receive the 3 yearly review of the Town and Parish Charter		Sally Gabriel	
25.01.22 1.02.22	<b>The Council Tax Reduction Scheme &amp; Exceptional Hardship Policy</b> To receive a review of the the Council Tax Reduction Scheme & Exceptional Hardship Policy which has been out for public consultation		Dean Emery	
22.03.22 7.04.22	<b>Safeguarding Children's and Adults at Risk Policy and Procedures</b> To receive the annual review of Safeguarding Children's and Adults at Risk Policy and Procedures		Matthew Page	

Meeting Date	Agenda Item	Theme	Officer Responsible	Comments
22.03.22 7.04.22	<b>Unauthorised Encampment Policy</b> To receive the 3 yearly review of the Unauthorised Encampment Policy		Andrew Busby	
22.03.22	<b>Work Plan</b> To receive the current work plan for the Community PDG.  Members to agree and discuss additional items that they would like added to the Work plan		Clare Robathan	
22.03.22	Chairman's Annual Report		Clare Robathan	
<b>Items for further discussion</b>				
	<b>Anti Social Behaviour</b> Community PDG to investigate anti social behaviour in the District		Clare Robathan	

This page is intentionally left blank

## Mid Devon District Council – items for agenda

This form should be completed by Member(s), Officers or members of the public when proposing an item for Scrutiny or a PDG.

Proposer's name and title	Cllr Ben Holdman	Date	November 2021
Proposed issue and brief description	Vulnerability policy: to develop a policy to support MDDC customers in vulnerable circumstances.		
Background	<p>Some customers that the Council comes into contact with will be vulnerable in the context of how we interact with them, depending on their personal circumstances.</p> <p>The Council has a duty to make reasonable adjustments and put in place appropriate additional support mechanisms to take account of these needs.</p> <p>Whilst it is very difficult to define, the Council is likely to consider someone to be vulnerable when their personal circumstances and characteristics mean they are significantly more likely than a typical person to suffer detriment in connection with how the Council deals with them, or where that detriment is likely to be more substantial.</p> <p>An adult or child in a potentially vulnerable situation may be someone whose situation includes:</p> <ul style="list-style-type: none"> <li>• Physical and mental medical conditions</li> <li>• Disability</li> <li>• Learning difficulties</li> <li>• Times of stress or anxiety (e.g., bereavement, redundancy)</li> <li>• Financial vulnerability</li> <li>• English not being the customer's first language</li> <li>• Influence of alcohol or drugs</li> </ul> <p>If the Council's customer service is not well prepared to handle calls from customers in each of these circumstances, it will risk damaging its reputation and, more importantly, harming the customer.</p>		
What will the outcome be?	For the PDG to agree that it would like Officers to develop a vulnerability proposal that will come back to the PDG for approval.		

This page is intentionally left blank