

**REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION**

**HOUSING INFRASTRUCTURE FUND: FUNDING AGREEMENTS WITH HOMES ENGLAND**

**Cabinet Member** \*\*\*\*\*  
**Responsible Officer** Mrs Jenny Clifford, Head of Planning, Economy and Regeneration

**Reason for Report:** To update Members on the progress of discussions with Homes England over the Council's two applications for funding under the Housing Infrastructure Fund (HIF) totalling £18.2 million, to seek authority to enter into grant funding agreements with Homes England over these funds and to seek authority for the Council to forward fund the two infrastructure projects in question.

**RECOMMENDATION: That Cabinet agree to:**

- 1. Enter into grant funding agreements with Homes England to secure £18.2 million Housing Infrastructure Fund monies and grant delegated authority to the Section 151 Officer in consultation with the Group Manager for Legal Services to finalise and sign the agreements;**
- 2. Forward fund the Cullompton town centre relief road and Tiverton Eastern Urban Extension phase 2 junction projects as set out in paragraphs 5.1 and 5.4 including taking out any associated borrowing.**

**Relationship to Corporate Plan:** These infrastructure projects are considered vital to enable development identified in the local plan to come forward and make a valuable contribution to delivering the priorities of the Corporate Plan 2016 to 2020; Economy, Homes, Community and Environment.

**Financial Implications:** The Housing Infrastructure Fund will play a pivotal role in bringing forward the corporate aspirations to facilitate growth within the district which in turn will help boost the economy. As grant to be recycled locally, this decision report will secure £18.2m for investment in infrastructure in Mid Devon.

At the outset of the bid process it was envisaged that no additional contributions from the District Council were required over and above those already reflected in existing budgets. However as the discussions with Homes England have progressed and the formal offer letters for the schemes have been received, it is clear that an element of forward funding (cash flow) from this Council will be needed to provide funding for the projects. This is for two reasons:

1. The grant funding agreements with Homes England for each project specifies that the HIF funds will be drawn down in accordance with a programme of payments that has been agreed with Homes England. Whilst these payment claims are programmed by quarter and can be in advance of spend, it is still possible that the Council will be required to bear project costs in the short term until the quarterly HIF draw down payment is claimed and made.

2. Funds are being made available through the HIF programme on the basis of a recoverable grant. Through the terms of the grant funding agreements to be entered into between the Council and Homes England, the Council will be required to use all reasonable but commercially prudent endeavours to secure the recovery of the HIF funding from housing developers. It is envisaged that this will be via S106 agreements to be entered into as part of the planning process. This is to ensure that public funds are not subsidising developer profit. There will therefore be a time lag between when monies needed to be expended in order to deliver the infrastructure and the recovery of funding from developers via S106 agreement. For the Cullompton relief road project in particular the overall project is expected to cost £15m, with £10m forward funding being provided through HIF. The £5m balance required to deliver the project will need to be forward funded by the Council until such time as S106 monies are collected from the housing development that is unlocked by the provision of the road.

The forward funding of monies for delivery of these projects by the Council is expected to be achieved through utilisation of the Council's existing financial resources and/or taking a loan via the Public Works Loan Board and will be reflected in the capital programme.

Any interest charges accrued in the forward-financing of infrastructure will be clawed-back through s106 arrangements. The financial risk to the council is one of phasing to deliver the infrastructure up front for residents' benefit, the anticipated net cost to the council is zero.

**Legal Implications:** This report considers the grant funding agreements for the HIF funding that will be required for each project, to be entered into between the Council and Homes England. The Council will be the accountable body for the projects. The contents of these grant funding agreements have been considered by the Group Manager for Legal Services and at the time of writing this report the project specific contents of the agreements are still under discussion with Homes England.

As required by Homes England, the Council has gained specialist state aid legal advice for each project. This advice has not raised any concerns.

It is proposed that Devon County Council will act as this Council's delivery partner. Given that the two HIF projects involve highway infrastructure, it is appropriate that the County Council as Highway Authority takes on the responsibility for their project managing, procuring, contracting and delivery. A formal agreement will be required between the two councils to this effect and to ensure compliance with the requirements of the HIF funding agreements.

A further area of legal implication is pursuance of S106 legal agreements as part of the planning process in order to secure developer contributions towards the cost of the delivery of the infrastructure in question. It is through this means that the Council proposes to recover the HIF funds as required by the grant funding agreements. Entering into S106 agreements in this way is a standard requirement and would have been sought irrespective of whether this HIF funding was forthcoming or not.

Legal implications will also arise as a result of the need to assemble and acquire land to deliver the Cullompton relief road scheme and also in respect of the legal

interests of existing sports providers likely to be affected and the loss of public open space. There are a range of land ownerships and interests that will need to be addressed and be the subject of negotiation as the project progresses. It is understood that the Cullompton Community Association Fields are subject to a charitable trust for recreational purposes. For the Tiverton A361 junction project, legal provisions for licenses and title transfer between the landowner and Devon County Council are already set out within a signed S106 agreement.

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 have a duty to pursue measures which are designed to improve air quality. The Council's Air Quality Action Plan includes the delivery of a Cullompton town centre relief road as an air quality mitigation measure, specifically due to the opportunity it provides to take traffic away from the High St which, as well as improving air quality in the vicinity, will also allow a future opportunity for the considered regeneration of the historic town settlement.

**Risk Assessment:** The consequences to the authority of not securing an adequate funding package for the infrastructure in question is serious as it could compromise the ability to deliver much needed housing and affect housing land supply. The Council is also currently at examination over the Local Plan Review. The Inspector will wish to be assured that the Plan is sound and provides deliverable housing sites in the early years of the Plan together with a supply of developable sites later in the Plan with a reasonable prospect of being developed at the point envisaged. It is therefore important that these key pieces of infrastructure come forward and HIF funding is a way by which they may be forwarded funded.

To qualify for funding, the proposed infrastructure will need to meet the HIF scheme criteria and deliverables. There has been significant contact with Homes England as part of the due diligence assessment process. This resulted in the issue of HIF offer letters. In order to meet fund timescales, work streams and expenditure have needed to commence. Until agreements are signed, all work to date is taking place at risk. The aspiration for the delivery of a relief road for Cullompton is long standing and as such, all work currently being undertaken to progress the project is not abortive as it forms part of more extensive infrastructure necessary to deliver the growth planned within the Cullompton area in the longer term including the garden village. The current HIF funding opportunity represents the best chance for it to be achieved in the short term and will require adherence to tight and challenging timescales. S106 funds collected to improve air quality in Cullompton and for the relief road scheme itself have been utilised to date, supporting the County Council's ongoing work to draw up and submit a planning application.

The need to meet agreed project milestones and the fund availability cut off dates remain a significant risk. The offer letters from Homes England were received approximately a year after the Ministerial announcement of the success of both projects under the fund. This delay and associated uncertainty has increased the risk of being able to deliver both projects within timescales that are acceptable to Homes England. At the time of writing this report the key milestones and target dates to be included within the agreements are matters under discussion with Homes England. Close liaison has taken place with the County Council with the aim of ensuring that

the programme and hence milestones for both schemes whilst ambitious (to reflect the urgency of Homes England) is nevertheless achievable. The grant agreement contains fund clawback provisions. Officers from both Councils will continue to work to de-risk the projects, liaise with Homes England and seek their delivery in accordance with the grant agreements. It should be noted that this does not prejudice or predetermine the assessment and decision making process on the future planning application for the Cullompton relief road project.

The risks associated with the Tiverton A361 junction project is considered less than with Cullompton as planning permission has already been granted and a signed S106 is in place between the landowner and County Council over licenses and land transfer.

There are particular risks with the Cullompton relief road project. These reflect the ongoing technical work, especially in relation to flood risk, the need to gain planning permission, assemble land and construct the relief road within a very tight timescale. Furthermore, should the relief road not be pursued through the HIF, this will impact upon the ability to deliver the relief road and its timing with resultant delay in realising highway capacity and environmental improvements in the town centre.

The recovery of forward funding by the Council via developer S106 agreement payments is dependent upon housing schemes coming forward within the timescale anticipated. The Council's adopted Local Plan and the Local Plan Review set out the policy framework for this. The Local Plan Review is currently at examination, the final outcome of which is awaited following examination hearings. The Council is utilising capacity funding to support activities such as masterplanning that will aid the delivery of the key housing sites in question. Officers will continue to work proactively to deliver these planned for sites, but this is ultimately not under the Council's control. Planning applications for some of these schemes have been received and are under consideration. Again, this does not prejudice or predetermine the assessment and decision making process on these applications.

**Equalities Assessment:** No equalities implications are anticipated as a result of this report.

## **1.0 Background: Housing Infrastructure Fund.**

1.1 In July 2017 the Government launched its £2.3 billion Housing Infrastructure Fund to finance infrastructure to unlock housing delivery. This funding to be awarded on a highly competitive basis. The Government has made this fund available to:

- Deliver new physical infrastructure to support new and existing communities;
- Make more land available for housing in high demand areas, resulting in new additional homes that otherwise would not have been built;
- Support ambitious local authorities who want to step up their plans for growth and make a meaningful difference to overall housing supply; and
- Enable local authorities to recycle the funding for other infrastructure schemes, achieving more and delivering new homes in the future.

1.2 This Council made two bids for HIF funding under the marginal viability part of the fund which was available to lower tier authorities. Proposals under this fund were capped at £10m each. The two schemes below both relate to highway Infrastructure schemes which will unlock development sites identified within both our adopted Local Plan and the Local Plan Review. The Council's HIF bids were considered and agreed at the meetings of Cabinet on 31<sup>st</sup> August 2017 and 23<sup>rd</sup> May 2018 with authority granted to make the bids and prioritise that relating to Cullompton.

1.3 It is now clear that the funding is offered on the basis of a locally recoverable grant. There is a requirement to recover the HIF funds from development. This Council will retain those funds locally (rather than return them to Homes England) and will need to recycle them into projects or schemes that achieve further accelerated housing delivery.

## **2.0 Background: Tiverton HIF project: Northern element of A361 junction east of Tiverton**

2.1 Construction of the first of two phases of the new junction off the A361 to serve the Tiverton Eastern Urban Extension has been completed on site. This first phase provides southern-side slip roads. The second phase of the junction is required to deliver Area B of the urban extension comprising up to 1,000 homes. (Further masterplanning of Area B is due to commence shortly pending award of the contract). The phase two junction works are for the bridge across the A361, the north side slips and associated landscaping. Planning permission has been granted for the full junction. HIF funding of £8.2m will deliver the northern phase of the junction.

2.2 Planning permission is also in place for up to 1,020 homes as part of the first phase of the urban extension (Area A), employment floorspace, a new community centre and primary school. The Tiverton Eastern Urban Extension is a strategic scale development allocation within the adopted Local Plan and Local Plan Review, the build out of which is significant to the delivery of these Plans. In the absence of the second phase of the junction, the homes in Area B will not come forward. The HIF bid has the support of Devon County Council, Tiverton Town Council, the Local Enterprise Partnership and Neil Parish MP.

## **3.0 Background: Cullompton HIF project: Cullompton Town Centre Relief Road**

3.1 At Cabinet on 23<sup>rd</sup> May 2018 it was agreed to proceed with the £10 million Cullompton HIF bid on the basis of delivering a town centre relief road to the east of Cullompton, which will improve capacity at the motorway junction together with achieving a reduction of traffic flows through the town centre resulting in air quality and town centre amenity benefits. The overall project cost is expected to be £15 million. The HIF bid for Cullompton infrastructure has the support of Cullompton Town Council, Cullompton Neighbourhood Plan Group, Devon County Council, the Local Enterprise Partnership and Neil Parish MP.

- 3.2 Devon County Council and Highways England have raised concerns regarding the capacity of Junction 28 for the M5 and its ability to accommodate additional traffic movements arising from planned developments. Whilst a longer term solution is planned comprising a strategic motorway junction improvement, the delivery of a town centre relief road for Cullompton will more quickly increase capacity at the motorway junction as a first phase of wider improvements. The relief road will facilitate more immediate development proposals to come forward comprising 2,000 homes planned for within the adopted Local Plan and Local Plan Review including of a first release of approximately 500 dwellings east of Cullompton which will form part of the Garden Village.
- 3.3 The delivery of the town centre relief road has also been a long held aspiration to reduce traffic flows through the town centre. Cullompton town centre is a designated Air Quality Management Area. 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 have a duty to pursue measures which are designed to improve air quality. The Council's Air Quality Action Plan includes the delivery of a Cullompton town centre relief road as an air quality mitigation measure.
- 3.4 The relief road will reduce traffic through Cullompton town centre, resulting in environmental improvement. The town's Conservation Area is included in the Historic England 'Heritage At Risk' Register where its condition is assessed as being very bad and deteriorating. In 2015 and 2017 applications were made to the Heritage Lottery Fund for a townscape heritage scheme. Despite the quality of the bids being recognised, neither were successful due to the fund being significantly oversubscribed. Subsequent contact with Historic England indicates other funding opportunities for the town's heritage, but that these would be unlikely to be available until such time as the traffic had been addressed through the delivery of the relief road. As such it can be seen that the delivery of a relief road is a pre-requisite to securing future investment in the heritage of Cullompton.
- 3.5 Where more than one HIF project has been submitted by a single Council, there is a requirement for the Council to rank them according to priority. At the Cabinet meeting of 31<sup>st</sup> August 2017 a decision was made to give the Cullompton bid highest priority out of Mid Devon's two HIF schemes.
- 3.6 The project is continuing to progress, with public consultation to establish a preferred route for the relief road route taking place between 13<sup>th</sup> September and 25<sup>th</sup> October 2018. Outcomes from this consultation indicated that 77% of the 617 respondents agreed with the need for a relief road, 61% considered it should be located to the west of the motorway rather than to the east and a clear preference was shown for one of the routes (Option B) when asked which option was preferred. At the meeting of Cabinet on 31<sup>st</sup> January 2019 it was resolved that Option B be recommended to Devon County Council as the preferred route, (subject to further technical verification work, including whether some aspects of the third alternative route be incorporated), that Devon County Council undertakes the further work with the preparation of a

planning application considers holding a second stage of consultation prior to submitting a planning application. S106 funds were also agreed to finance the further work in these recommendations.

- 3.7 At a meeting of Devon County Council's Cabinet on 13<sup>th</sup> March 2019 it was resolved:
- a) that the preferred route for the relief road be approved;
  - (b) that the development and submission of a planning application for the relief road be agreed;
  - (c) that delegated authority be given to the Head of Planning, Transportation and Environment, in consultation with the Cabinet Member for Infrastructure, Development and Waste, to make minor amendments to this scheme;
  - (d) that an increase to the Planning, Transportation and Environment 2019/20 capital programme of £250,000, funded by external contributions be approved; and
  - (e) that a further consultation, as requested by Mid Devon District Council, be approved, which could include a review of connections to the existing road network.

Since March 2019, the County Council has been working on the technical evidence, design of the road and liaison with affected land owners/ land interests. It is understood that a planning application is expected to be submitted to this Council in the Autumn of 2019 before which the County Council will hold a further public consultation exercise.

#### **4.0 Grant funding agreements with Homes England**

- 4.1 Offer letters for grant funding for both schemes totalling £18.2 million have been received from Homes England. In order to draw down this money, a funding agreement for each project must be entered into between the Council and Homes England. Separate agreements will also be needed with Devon County Council to deliver the infrastructure in question.
- 4.2 The grant funding agreements are set out in a standard form, but allow for project specific circumstances and milestones to be included. Officers, including the Group Manager for Legal Services have reviewed and negotiated with Homes England over the wording of the draft agreements. As drafted the agreements are structured as follows:

##### **Section 1**

This includes details of the project and funding programme (HIF) and the parties entering into the agreement together with recitals within which Homes England agrees to make the grant funding available. The Local Authority may either directly procure for the delivery of the infrastructure project or provide funding to developer parties or third parties. In this instance the County Council is the proposed delivery partner.

Key principles for the funding of the project are set out including the total amount (£8.2m Tiverton and £10m Cullompton) including definitions of the HIF funded infrastructure and the wider project. The latter being the homes that will be unlocked as a result of the infrastructure. The funding is available

until 31<sup>st</sup> March 2021(Cullompton) and 31<sup>st</sup> March 2022 (Tiverton). Start and completion dates are to be included following discussion with Homes England.

Conditions precedent to each claim for funding relate to how and when the claims are presented and Homes England agrees to pay the funding in accordance with the terms of the agreement. Claims require sign off by the Council's S151 Officer. The Local Authority agrees to meet monitoring and progress report requirements and repay any overpayments. This section also addresses communication details between the Council and Homes England, procedures for amendments and termination of the agreements.

## **Schedule 2**

This section sets out standard terms and conditions of the funding and definitions used. Homes England agrees to make the funding available subject to pre-conditions being fulfilled. Pre-condition submissions have been made to Homes England for both schemes and relate to project information such as project programme, cashflow, land assembly approach (Cullompton), recovery mechanism for the HIF funding and obtaining independent state aid advice.

The Local Authority agrees to a series of warranties and representations and will be the accountable body for these projects. Of note is the requirement for the Local Authority to recover the HIF funding from developers or site owners. It is proposed that the Council use all reasonable or commercially prudent endeavours to do so. Recovered HIF money may be retained by the Local Authority and recycled so it is used for further housing delivery. The mechanism proposed by the Council for recovery of HIF funding is via S106 agreements in connection with the associated housing developments.

Given that the County Council will deliver and hence procure and run the contracts for the construction of the road and junction in question, the separate agreement to be drawn up between this Council and the County Council will seek to ensure compliance with the relevant funding agreement warranties.

The arrangements and requirements for the payment of the funding are set out in this schedule, for example the arrangements and format for the submission of claims. This Council will seek agreement with the County Council that it will prepare and evidence the claims for checking and submission by this Council. Claims will require Section 151 Officer sign off.

Unless agreement is gained to vary, the Local Authority is to ensure the project commences by the start date and is carried out in accordance with the milestone dates and cashflow to be agreed with Homes England. Clawback on default provisions are included to safeguard the position of Homes England, as is the ability to require repayment or recover funds if required under state aid provisions. This Council has already gained independent state aid legal advice for each project which has not raised any concerns.

This section also includes requirements over reporting of progress, inspection, audit, conduct, insurance, confidentiality, freedom of information, data protection, insurance, indemnity, VAT, project changes, access to information

and publicity. Many of the obligations within this schedule are expected as part of a standard funding agreement in order to set out the obligations on each party and safeguard the position of each.

### **Schedule 3**

This schedule sets out milestones (agreed key events and stages for the projects) in relation to both the HIF infrastructure and the associated wider housing developments. At the time of writing this report these milestones are still under discussion with Homes England but relate to establishing a series of agreed dates, such as project start and completion, planning permission, procurement and first claim for funding. The County Council has programmed the delivery of both projects and this information has informed those discussions. The measure for outputs will be the number of homes delivered.

### **Schedule 4**

This schedule will set out a series of pre-conditions to be satisfied before the drawdown of funds. Standard pre-conditions include non-breach of the agreement, state aid advice, land title provisions, the appointment of suitable contractors and approval of the project cashflow.

Project specific pre-conditions are also included relating to agreement of the recovery mechanism (S106 proposed), title/land assembly, planning permission and contractor procurement. These are the subject of discussion with Homes England.

### **Schedule 5**

Project specific clauses have been drafted by the Group Manager for Legal Services to safeguard the interests of the Council and to reflect the existence of a delivery partner (the County Council) in relation to responsibilities/obligations set out in other parts of the agreement.

- 4.3 It is clear that the majority of the contents and hence requirements of the funding agreements received from Homes England are standard. Project specific content has been carefully reviewed by officers in order to be factually correct and at the time of writing this report the contents of schedule 5, key milestones and pre-conditions remain the subject of discussion with Homes England. In order to proceed with this £18.2 million funding opportunity the agreements will need to be entered into. Homes England wish this to occur before the end of May 2019. It is understood that a resolution to do so before this date is sufficient, allowing for the agreements to be finalised and signed shortly thereafter. Agreement is sought to do so, as is delegated authority for the Section 151 Officer in consultation with the Group Manager for Legal Services to finalise and sign the agreements.

## **5.0 Project funding and cash flow**

- 5.1 For the Cullompton scheme, total project cost is expected to be £15 million, £10 million of which will be forward funded by Homes England via the HIF programme. The Council will seek to fund both the £5 million shortfall and locally recover HIF funding through S106 agreements as part of development planning applications. However, the timescale within which S106 payments would be expected lags behind the need to deliver the road scheme quickly to

meet Homes England requirements. Accordingly there is a need for the Council to forward fund (cash flow) the £5 million shortfall until S106 funds are received. This would be included in the Council's Capital Programme. It is expected that S106 funds will be received during the next 12 year period.

- 5.2 Evidence before the recent Local Plan Review examination hearings on the housing trajectory indicates an anticipated timescale for housing coming forward on the North West Cullompton (CU1) and East Cullompton (CU7) allocations. A planning application for development of the 100 house contingency site of Colebrook (CU21) has also been received (19/00118/MOUT). If granted, its potential housing trajectory is also included below and applications from these sites would be expected to make financial contributions towards the relief road. Note that only the first 500 homes at East Cullompton have been included as these will be unlocked by the relief road. The remainder of homes at East Cullompton will require a further, more substantial motorway junction upgrade.

Site	Policy	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	TOTAL
NW Cullompton	CU1	49	100	100	150	150	176	100	100	100	100	100	100	25	1350
East Cullompton	CU7			50	100	100	125	125							500
Colebrook	CU21	12	25	25	38										100

- 5.3 Similarly, build out of the Tiverton EUE housing would also be expected to take place up to 2033, also indicating an approximately 12 year period within which S106 monies would be expected to recover HIF funds, however in this case Council forward funding of this type is not anticipated.
- 5.4 There is a further area where more short term Council forward funding may be required and applies to both projects. The grant funding agreements with Homes England for each project specifies that the HIF funds will be drawn down in accordance with a programme of payments that has been agreed with Homes England. Whilst these payment claims are programmed by quarter and can be in advance of spend, it is still possible that the Council will be required to bear project costs in the short term until the quarterly HIF draw down payment is claimed and made.
- 5.5 At the time of writing this report the draft drawdown for each project as expected is set out. Note that amendment to the distribution of funds between instalments may be possible prior to agreement signature.

### **Tiverton £8.2 million**

Period	1 <sup>st</sup> instalment	2 <sup>nd</sup> instalment	3 <sup>rd</sup> instalment	4 <sup>th</sup> instalment
19/20	£5,000	£10,000	£20,000	£15,000
20/21	£140,000	£5,000	£5,000	£100,000
21/22	£20,000	£700,000	£2,500,000	£4,680,000

## Cullompton £10 million

Period	1 <sup>st</sup> instalment	2 <sup>nd</sup> instalment	3 <sup>rd</sup> instalment	4 <sup>th</sup> instalment
19/20	£170,000	£212,857	£219,286	£241,429
20/21	£2,192,857	£1,150,649	£1,537,240	£4,275,682

### 6.0 Conclusions

- 6.1 This represents a significant opportunity to gain £18.2 million to fund key highway infrastructure that will enhance the town centre environment of Cullompton and for both, deliver highway capacity improvements that will unlock housing development planned for in the Council's adopted Local Plan and the Local Plan Review for which examination hearings have been held. It is considered that both projects are important to the Local Plan Review and have policy support.
- 6.2 This Council has already resolved to pursue these HIF bids and the delivery of these infrastructure projects. Officers have been working hard to progress not only the projects themselves, but also through submissions and discussions with Homes England to secure the funding in question. In order to draw down funds the Council is required to enter into grant funding agreements which have been drafted for each scheme.
- 6.3 Authority to cashflow the funds necessary until claims for drawdown are made and funds received is sought in order to provide resilience over project cashflow and flexibility if required. Wherever possible claims will be made in advance for drawdown. Authority is also sought to cashflow project delivery where HIF funds are insufficient to cover the total cost of delivering the infrastructure in question. For Cullompton, £10 million of HIF funds will make a substantial contribution towards the expected £15 million project cost. Whilst project cost recovery from development via S106 will be sought, funds secured through this mechanism will lag behind project spend.

<p><b>Contact for any more information</b></p>	<p>Andrew Jarrett Deputy Chief Executive (Section 151) <a href="mailto:ajarrett@middevon.gov.uk">ajarrett@middevon.gov.uk</a> 01884 255255</p> <p>Jenny Clifford Head of Planning, Economy and Regeneration <a href="mailto:jclifford@middevon.gov.uk">jclifford@middevon.gov.uk</a> 01884 234346</p> <p>Kathryn Tebbey Group Manager for Legal Services <a href="mailto:ktebbey@middevon.gov.uk">ktebbey@middevon.gov.uk</a> 01884 234210</p>
<p><b>Background Papers</b></p>	<p>Cabinet November and December 2014; Council January 2015; Council 27<sup>th</sup> April 2016; Cabinet 15<sup>th</sup> September 2016;</p>

	<p>Council 22<sup>nd</sup> September 2016;  Cabinet 21<sup>st</sup> November 2016  Council 1<sup>st</sup> December 2016  Cabinet 31<sup>st</sup> August 2017  Cabinet 23<sup>rd</sup> May 2018  Cabinet 30<sup>th</sup> August 2018  Cabinet 31<sup>st</sup> January 2019</p> <p>MHCLG  <a href="https://www.gov.uk/government/publications/housing-infrastructure-fund">https://www.gov.uk/government/publications/housing-infrastructure-fund</a></p>
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