

EXECUTIVE

Date: Tuesday 1 October 2024

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Manager on 01392 265477.

Entry to the Civic Centre can be gained through the rear entrance, located at the back of the Customer Service Centre, Paris Street.

Membership -

Councillors Bialyk (Chair), Wright (Deputy Chair), Allcock, Asvachin, Foale, Vizard, Williams, R and Wood

Agenda

Part I: Items suggested for discussion with the press and public present

1 **Apologies**

To receive apologies for absence from Committee members.

2 **Minutes**

To approve and sign the minutes of the meeting held on 3 September 2024.

(Pages 5 -
10)

3 **Declarations of Interest**

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item.

Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

4 **Local Government Act 1972 - Exclusion of Press and Public**

It is considered that the Committee would be unlikely to exclude the press and public during consideration of any of the items on the agenda, but if it should wish to do so, the following resolution should be passed:-

RECOMMENDED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs of Part 1, Schedule 12A of the Act

5 Questions from the Public Under Standing order No. 19

To receive questions relating to items on the Agenda from members of the public and responses thereto.

Details of questions should be notified to the Democratic Services Manager by 10.00am at least three working days prior to the meeting. Further information about speaking at a committee can be found here: [Speaking at a Committee](#)

6 Review of Corporate Risk Register

To consider the report of the Strategic Director for Corporate Resources. (Pages 11 - 42)

7 Overview of General Fund Revenue Budget 2024/25 – Quarter 1

To consider the report of the Strategic Director for Corporate Resources. (Pages 43 - 64)

8 2024/25 General Fund Capital Monitoring Statement – Quarter 1

To consider the report of the Strategic Director for Corporate Resources. (Pages 65 - 78)

9 2024/25 HRA Budget Monitoring Report – Quarter 1

To consider the report of the Strategic Director for Corporate Resources. (Pages 79 - 96)

10 Approved Projects Options Report

To consider the report of the Strategic Director for Corporate Resources. (Pages 97 - 108)

11 Household Support Fund scheme 6

To consider the report of the Strategic Director for Corporate Resources. (Pages 109 - 114)

12 Public Sector Decarbonisation Scheme 3b Project – RAMM & Riverside Leisure Centre

To consider the report of the Strategic Director for Corporate Resources. (Pages 115 - 120)

13 Annual Infrastructure Funding Statement 2023 - 2024

To consider the report of the Strategic Director for Place. (Pages 121 - 150)

- 14 **RAMM business plan for Arts Council England National Portfolio Organisation extension year 2026-27**
- To consider the report of the Strategic Director for Place. (Pages 151 - 182)
- 15 **Air Quality Annual Status Report**
- To consider the report of the Interim Joint Director – Environment, Waste and Operations (SL). (Pages 183 - 320)
- 16 **Food Law and Health and Safety Enforcement Service Plan 2024 - 2025**
- To consider the report of the Interim Joint Director – Environment, Waste and Operations (SL). (Pages 321 - 366)
- 17 **Tree and Woodland Maintenance and Inspections Contract**
- To consider the report of the Interim Joint Director – Environment, Waste and Operations (CC). (Pages 367 - 372)
- 18 **Honorary Aldermen – Mr Richard Branston**
- To consider the report of the Strategic Director for Place. (Pages 373 - 376)

Date of Next Meeting

The next scheduled meeting of the Executive will be held on **Tuesday 5 November 2024** at 5.30 pm in the Civic Centre.

A statement of the executive decisions taken at this meeting will be produced and published on the Council website as soon as reasonably practicable.

Find out more about Exeter City Council services by looking at our web site <http://www.exeter.gov.uk>. This will give you the dates of all future Committee meetings and tell you how you can ask a question at a Scrutiny Committee meeting. Alternatively, contact the Democratic Services Officer (Committees) on (01392) 265115 for further information.

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EXECUTIVE

Tuesday 3 September 2024

Present:

Councillor Bialyk (Chair)

Councillors Wright, Allcock, Asvachin, Vizard, Williams, R and Wood

Also present:

Councillor Jobson (as an opposition group Leader);

Councillor Moore (as an opposition group Leader); and

Councillor M. Mitchell (as an opposition group Leader).

Apologies:

Councillor Foale

Also present:

Chief Executive, Strategic Director for Place, Strategic Director for Corporate Resources, Strategic Director for People, Interim Director Community Services (SL), Head of Service - Legal and Democratic Services & Acting Monitoring Officer and Democratic Services Manager

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MINUTES

The minutes of the meetings held on 9 July 2024 and 13 August 2024, were taken as read, approved and signed by the Chair as a correct record.

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DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

91

QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

A member of the public, Mr Cleasby submitted the following question, related to Minute No. 92:-

- In commissioning the study for options for relocating services from the Civic Centre will the Council rule out the use of the historic Guildhall for committee meetings?

The Council Leader in responding, advised that the use of the historic Guildhall for committee meetings would not be ruled out at the current time.

Mr Cleasby on putting a supplementary question, enquired whether the Council would take account of the issues of the building and address the downside of the use of the Guildhall, including acoustics and layout?

The Council Leader advised that only full Council meetings were held in the Guildhall. All issues would be addressed and all options and suggestions would be considered, but nothing was being ruled out or in at the current stage.

92

RELOCATION OF COUNCIL SERVICES BASED IN THE CIVIC CENTRE

The Executive received the report which sought approval to enable officers to proceed to the next stage of planning for a potential move of the Council services

currently based at the Civic Centre to a number of Council owned sites. The potential move would relocate all three phase buildings at the Civic Centre site.

The current layout of the Civic Centre did not promote modern workplace practices for hybrid meetings, had surplus capacity and due to the Council's current financial resources, it was not possible to spend significantly on a new building. Making better use of existing assets would be more cost-effective in improving working conditions and enable the Council to fully embrace collaborative working across teams and services.

Particular reference was made to the freeing up a site for regeneration, which would enable surplus funds from the Guildhall Shopping Centre being used to fund the work without impacting on the taxpayer.

Councillor's Mitchell and Moore as opposition group leaders spoke on the item and raised points and questions, which were responded to by Senior Officers, as detailed further in this minute.

During the discussion, Executive Members raised the following points and questions:-

- how would the Council avoid silo working, with a number of different physical locations being considered?
- would the potential move align with the One Exeter work programme?
- would there be problematic for staff working in different physical locations?
- clarity was sought on the ring-fenced Guildhall surplus funds and why it was not usable for other services?
- It was clarified that 8.6 of the report regarding the floor of the Bradninch Place, referred to the second floor of the Bradninch Place;
- the report was welcomed, notably the carbon footprint and environmental information; and
- having a representative from the Net Zero team being invited to the project was welcomed and assurance was sought that projected carbon impact information would be provided as the project moved forward.

In response to questions and points raised by Members and opposition group leaders, the Chief Executive advised that:-

- carbon impact projections would be addressed in the next stage of work;
- it was confirmed that the report was referring to the second floor of the Bradninch Place;
- silo working was a cultural issue and work had commenced to address the issue. Regular meetings were also held to enable the senior leadership team and heads of service to work together for the benefit of the whole Council;
- the Council was looking to create more modern workspaces for improved and collaborative environments;
- there had been work undertaken for the current layout of the civic centre, to provide agile and flexible working and open plan spaces. This work also supported the Council during the Covid lockdown, allowing staff to continue working from home;
- all partners with a signed Council lease were aware of the intention to move premises;
- work was being undertaken to explore co-location options, but the primary focus was ensuring there was suitable accommodation for Council staff, with a focus on vacant units for office space at the Guildhall Shopping Centre;

- the requested funding in the recommendations, would provide the opportunity to do undertake work on various issues and costings to form an evidence base for moving forward; and
- the Council worked with trade unions through the Joint Consultation and Negotiation Committee (JCNC). The trade union also sat on the Council staff sounding board, working with staff on the existing Civic Centre arrangements. The sounding board and Union would also be involved with the Guildhall plans.

In response to questions and points raised by Members and opposition group leaders, the Strategic Director for Corporate Resources advised that:-

- any surplus made from the Guildhall could only be used either to enhance the centre or for housing regeneration projects, and therefore could only be used for specific purposes as agreed with the Government as part of the purchase for the Guildhall shopping centre;
- there was an internal resource to manage disposal plans and the £100,000 budget would be used to provide additional support for developing the proposals; and
- the first recommendation was asking the Executive to agree for officers to proceed with plans and costings to move the project forward. Council were being asked to approve the second recommendation, and should they reject that, then work for the full costing would not proceed, but internal work would continue.

The Leader moved the recommendations, which was seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RESOLVED that the Executive agree for officers to proceed with detailed plans and costings for the enhancement of a number of Council-owned sites in order to relocate staff currently based at the Civic Centre.

RECOMMENDED that Council approve a budget of up to £100,000 to develop full designs and costings for the project, funded from ringfenced surplus funds from the Guildhall Shopping Centre.

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REVISED LOCAL DEVELOPMENT SCHEME 2024

The Executive received the report on the revised Local Development Scheme (LDS) which provided a scope and timetable for preparing Council planning policy documents, including the Exeter Plan, and Supplementary Planning Documents (SPDs). Although the existing Local Development Scheme was approved in July 2023, work on the Exeter Plan and other planning policy documents had progressed and it was a statutory requirement to ensure the Local Development Scheme was up to date.

Particular reference was made to:-

- the latest update included a slightly amended timetable for the Exeter Plan and new work on an SPD for a new state-of-the-art health campus at the University of St Luke's site;
- significant progress had been made on bringing forward the Exeter Plan including the full draft that was subject to public consultation, earlier this year;
- several significant projects had been completed since the last LDS, which included a new SPD for Water Lane, a new CIL charging scheme, and a revised Householder Extensions and Alterations SPD;

- an extension of the area of the city centre covered by the Article 4 Direction, relating to Houses in Multiple occupation (HMOs);
- the current published Exeter Plan timetable included the publication of a draft version (Regulation 19) for consultation, in October 2024;
- it was now proposed to publish the draft Publication version for consultation in December 2024 - January 2025, with a final submission to the Planning Inspectorate scheduled for June 2025, with an anticipated adoption date for November 2026; and
- a delay was required to prepare further evidence in response to an earlier consultation at the beginning of the year. The Council remained committed to bringing forward a new local plan quickly and providing sufficient quality and quantity of homes including affordable homes.

Councillor's Mitchell and Moore as opposition group leaders spoke on the item and raised points and questions, which were responded to by the Strategic Director for Place, as detailed further in this minute.

During the discussion, Executive Members raised the following points and questions:-

- the report and significant work and achievements of the team was commended;
- clarification was sought that Exeter currently could demonstrate a 5-year land supply ;
- clarification that the impact of the increased housing targets would not take effect until after the Exeter Plan was adopted;
- although there were other supplementary planning policies, it was important for the team to focus on the new timeline to prevent starting the process over;
- the housing reforms were welcomed and the Council wanted to deliver the right number and quality of homes in the right places to meet resident's needs;
- the Council would be responding to the consultation on the National Planning Policy Framework (NPPF), but there would be a considerable uplift in the realistic delivery of housing;
- it was important that the Exeter Plan was robust to ensure it passed examination, and required strong evidence to support it; and
- reassurance was sought that the current Local Plan still carried weight for planning decisions and despite a delay, emerging policies in the Exeter Plan also carried weight.

The Leader highlighted Exeter's ambitions for delivering homes and commended the work and engagement undertaken.

In response to questions and points raised by Members and opposition group leaders, the Strategic Director for Place advised that:-

- the four-year land supply had been clarified by Government guidance, in which the Council was now working to a five-year land supply;
- the Council had previously adopted a local plan which carried full weight but required updating;
- completing the Local Plan quickly was important and once adopted, planning for the uplift in housing numbers could commence;
- the current draft consultation had minimal weight, but the publication version, once submitted, would carry greater weight;
- the Local Development Scheme (LDS) was a high-level programme and there would have different stages for Member and public involvement in plan making.

Exeter maintained an excellent consultation and engagement record in its planning process;

- all the issues being addressed were evidence focussed, which created extra work in addressing all the sustainability issues;
- the Council was obtaining social, environmental, climate and economic sustainability evidence as part of the legal requirements of the plan;
- the Council understood where co-living developments were coming forward and had been taken into account through the Exeter Plan;
- waste and minerals were outlined in the strategic assessment and the Council's response also strengthened the legality of the plan when it goes to examination;
- the Exeter University Master plan had been adopted and but did not have SPD status. Elements of it were included in the core strategy, but it required an update by the University; and
- a master plan for St. Luke's Campus would be different to the main campus documents and therefore would be considered differently.

The Leader moved the recommendations, which was seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RESOLVED that the revised Local Development Scheme (Appendix A of the report) be approved as the basis for preparing local planning policy.

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RISK MANAGEMENT POLICY

The Executive received the report which sought approval of the updated Risk Management Policy which reflected the new Strategic Leadership structure and reporting arrangements. It was important that the Council had a robust policy and approach for identifying, managing, and monitoring corporate risks which could impact on delivering the Council's strategic priorities and the policy would be reviewed every two years.

Councillor's Mitchell and Moore as opposition group leaders spoke on the item and raised points and questions, which were responded to by the Strategic Director for Corporate Resources, as detailed further in this minute.

During the discussion, Executive Members raised the following points and questions:-

- the policy referenced the responsibilities of the Executive and Strategic Management Board (SMB) and highlighted that the Executive was responsible for approving the policy;
- Portfolio Holders as the elected Executive Members, regularly reviewed their areas of responsibility, working with their relevant Strategic Director, which were then presented with the Council Leader, who had overall responsibility for accepting and managing risks; and
- the register was a living document, in which Portfolio Holders monitored and updated their risks and mitigations accordingly.

In response to questions and points raised by Members and opposition group leaders, the Strategic Director for Corporate Resources advised that:-

- the Executive consisted of the responsible Portfolio Holders, and had been grouped as such in the policy accordingly;

- Portfolio Holders were responsible for working alongside the Strategic Management Board (SMB) in monitoring risks, and had the opportunity to propose for risks to be removed at the Executive meeting;
- in the event a risk was considered to be in an unacceptable position, SMB would bring the matter to full Council to address; and
- the policy reflected the Financial Regulations set out in the Council's Constitution, which required that the risk register be presented to the Audit and Governance for consideration ahead of the Executive for approval.

The Leader moved the recommendations, which was seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RESOLVED that the dated Risk Management Policy be approved in accordance with paragraph 5 of the Council's Financial Regulations.

(The meeting commenced at 5.30 pm and closed at 6.39 pm)

Chair

The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 15 October 2024.

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

Report of: Strategic Director of Corporate Resources

Title: Review of the Corporate Risk Register

Is this a Key Decision?

No

Is this an Executive or Council Function?

Risk management is a Council function.

Risk Management is an important element of the council's Code of Corporate Governance.

Regular monitoring of the council's corporate risks helps to ensure that the council's business is conducted in accordance with the law and proper standards, that public money is safeguarded and properly accounted for and used economically, efficiently, and effectively.

1. What is the report about?

1.1 The Executive is responsible for approving the Corporate Risk Register following consideration and review of the Audit and Governance committee.

1.2 This report advises the Executive of the council's risk management progress and presents the revised Corporate Risk Register (Appendix A) and Corporate Risk Register Summary (Appendix B), which has been linked to the Council's Strategic Priorities.

2. Recommendations:

2.1 That the Executive approves the Council's Corporate Risk Register (Appendix A) and Corporate Risk Register summary (Appendix B)..

3. Reasons for the recommendation:

3.1 To ensure that the risks associated with meeting the Council's Strategic Priorities are properly considered, managed, and monitored.

4. What are the resource implications including non financial resources

4.1 The Executive, Strategic Directors and Heads of Service, as appropriate, are asked to review the Corporate Risk Register on a quarterly basis. The register is reviewed quarterly by the Strategic Management Board.

4.2 Any actions agreed to mitigate the risks identified in the Corporate Risk Register may result in some resource implication. These would be subject to a specific report and the resource implications would be considered in that report.

5. Section 151 Officer comments:

5.1 SMB and the Executive have produced the register based on Council's Strategic Priorities. A summary page (Appendix B) has been added setting out the level of intervention required and the impact of failing to address the risk. The risk in relation to finance has been updated to reflect the fact that a balanced budget has been set for 2024-25. This does not mitigate the longer term associated risks but carries the risk forward.

6. What are the legal aspects?

6.1 Risk Management is an essential management tool to manage, assess and prioritise risks. Members will note the content of this report and the updated Corporate Risk Register at Appendix A which identifies risks identified. By identifying risks, they can be understood and managed proactively.

7. Monitoring Officer's comments:

7.1 There is no specific regulatory requirement to keep a risk register. However, it is a standard way to monitor and assess risk. The risk register identifies the overall risks to the Council in order that this can be understood and managed proactively, optimising success by identifying and addressing risks.

8. Report details:

8.1 In response to a review of the Corporate Risk Register by the Council's insurers, Zurich, the Strategic Management Board agreed that the Corporate Risk Register should be presented to Executive to provide assurance that the appropriate mitigations are in place. The council's Audit & Governance Committee will continue to consider the Corporate Risk Register for approval to Executive and ensuring that the council has a robust process in place for identifying and mitigating risks.

8.2 Each risk is assessed against the following matrix, assessing the likelihood and impact before and after mitigation.

Likelihood ↑	4	4	8	12	16
	3	3	6	9	12
	2	2	4	6	8
	1	1	2	3	4
		1	2	3	4
		Impact →			

8.3 The Risk Register includes a summary document (Appendix B), which enables Members to see the scope of the corporate risks in one straightforward table. This table is presented below for ease of reference.

Corporate Plan Alignment Area	Risk Description	Risk Scoring		
		Inherent	Residual	Target Date
Net Zero Carbon City	Delivering against the key challenges in the Net Zero Carbon City section of the Corporate Plan	16	16	Apr-30
Healthy and Active City	Making progress towards a Healthy and Active City	12	6	Mar- 2025
Leading a Well-run Council	Adapting the council workforce to ensure appropriate skills and experience (Developing a future proof workforce)	9	6	Sep-25
Leading a Well-run Council	Maintaining the Financial Sustainability of the Council	16	8	Feb-25
Leading a Well-run Council	Maintaining the Council's Property and Infrastructure Assets	16	12	Feb-26
Housing and Building Great Neighbourhoods	Delivering Housing and Building Great Neighbourhoods and Communities	16	16	On going
Thriving Culture and Heritage	Maintaining a thriving Culture and Heritage sector	9	2	Oct 24
Prosperous Local Economy	Delivering against the key challenges in the 'Prosperous Local Economy' section of the Corporate Plan.	12	9	Mar 25
Leading a Well-run Council	Progressing the design and delivery of a corporate Customer and Digital Strategy	16	8	Mar-26

8.4 Alongside each risk on the summary page, there is a table, which sets out an assessment of the resources required to manage the risks under the themes of Time, Financial, People and Assets. This will allow for an assessment of the resources required to mitigate each risk to an acceptable level allowing members to determine if the resources required are deliverable and achievable.

8.5 In addition, the summary page includes an assessment of how the risks will affect a range of drivers.

8.6 The two tables use Very high, High, Medium, Low and Very Low to assess the resources required and the risk drivers.

8.7 The Final Column will assess the Council's risk appetite, whether it is open to risk, more cautious or even risk averse. These two tables help to inform the final risk scores presented in the register.

Further development of the Corporate Risk Register

8.8 In response to feedback from Members, the format of the Corporate Risk Register

has been reviewed to improve accessibility. Members should now be able to easily view the document on a monitor.

8.9 Over the next three months, the Corporate Risk Register will be reviewed by the Strategic Management Board, with support from the council's insurers Zurich. The purpose of the review will be to ensure that the Corporate Risk Register contains risks that could impact on the achievement of the council's strategic priorities and that these risks are articulated effectively and that controls are in place. Strategic Directors will ensure that Portfolio Holders are involved in this work.

8.10 In addition, training and support will be provided to officers and Members to help build resilience and ensure that emerging as well as existing strategic risks are kept under close review.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 Good governance contributes to the Council's purpose of a "Well Run Council."

10. What risks are there and how can they be reduced?

10.1 N/A

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the report is for information only.

12. Carbon Footprint (Environmental) Implications:

12.1 No direct carbon/environmental impacts arising from the recommendations.

12.2 Actions to mitigate the risks identified in the Corporate Risk Register may result in some future impact, however, any actions proposed would be subject to a specific report and the impacts would be considered in that report.

13. Are there any other options?

13.1 N/A

Strategic Director of Corporate Resources, Dave Hodgson

Author: Lorraine Betts, Organisational Transformation Programme Lead

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

Contact for enquires:
Democratic Services (Committees)
Room 4.36
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Corporate Risk Register

APPENDIX A

						Review Month:			September 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		

1	Delivering against the key challenges in the Net Zero Carbon City section of the Corporate Plan										
	<p><u>Challenges:</u></p> <ul style="list-style-type: none"> GHG emissions in Exeter were on a downward trajectory with emissions down by a third from 2008 to 2019. This reduction is largely due to the reduction in the carbon intensity of the national electricity grid. There has been a 64% reduction in emission from the power sector (with most generation plant located outside Exeter) between 2007 and 2019. It is concerning that emissions from buildings and transport are exceeding targets set for 2020 and the lack of progress in these sectors, combined with growth in the city, will potentially lead to increases in emissions. Significant work to reduce emissions from buildings and transport will be required to deliver Net Zero for the City. <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> Exeter does not meet its citywide target of becoming Net Zero by 2030. 										

Corporate Risk Register

APPENDIX A

						Review Month:			September 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
	November 2019	PH - Climate, Ecological Change & Communities Officer Lead: Strategic Director for Place	4	4	16	We are working with the University of Exeter and Devon County Council to support their work in this area and focusing on reducing city wide carbon emissions. Our internal carbon net zero plan is now the subject of a separate risk register presented half yearly to the Audit & Governance Committee by the Project Manager for Net Zero.	4	4	16	A Programme Manager has been appointed and is in post for two years to lead on City Wide Net Zero. Exeter Energy (1Energy) presented an overview of the proposed Exeter District Heat Network (DHN) to members. Exeter Energy has consulted on proposals for an Energy Centre, located at Grace Road Fields, Water Lane. Executive has agreed in principle, to the disposal of land at Grace Road Fields to build the Energy Centre. A review of city-wide carbon emissions has been commissioned (funded by the University of Exeter), which will be presented to Strategic Scrutiny November 2024 with future updates presented every 6 months on activity and progress	Apr-30

Corporate Risk Register

APPENDIX A

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			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		

2	<p>Making progress towards a Healthy and Active City</p> <p>Challenges</p> <ul style="list-style-type: none"> • Entrenched health inequalities in priority neighbourhoods. • Cost of living crisis impacting on the ability of people to participate in paid for sport and physical activity including membership/fees at council leisure centres. • Securing long term funding for Wellbeing Exeter with its proven ability to positively enable sustainable increases in physical activity amongst communities facing the biggest barriers and poorest health outcomes. • Rising energy, maintenance and staffing costs of leisure centres. • Achieving a balance between membership and running costs of leisure centres to achieve the Council ambition of providing a high-quality leisure service accessible and relevant to individuals and families on low incomes and culturally diverse communities. • Delivering planned financial and operational outcomes of St Sidwell's Point Swimming Pool and Leisure Centre. • Securing capital and revenue funding for the plan to create a Community Health and Wellbeing Hub at Wonford. <p>Potential Impacts</p> <ul style="list-style-type: none"> • Inability to achieve the strategic ambition of maintaining high-quality, city-wide, cost neutral built leisure facilities. • Increasing subsidies for leisure services impacting on other service provision. • Closure of some leisure centres reducing access to facilities for current users. • Wellbeing Exeter closes and systemic asset-based community development across priority neighbourhoods ends, and vulnerable communities feel let down by the council.
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Corporate Risk Register

APPENDIX A

						Review Month:			September 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
	May 2023 updated by Interim Director August 2024	Portfolio Holder for Leisure and Physical Activity. Officer Lead: Strategic Director, People (Interim from August 2024)	4	3	12	<p>Wellbeing Exeter Case for Change published in 2023 with a more targeted and flexible model.</p> <p>Funding secured for 24/25 through a combination of Sport England Grant and ECC Neighbourhood CIL funding.</p> <p>Successful implementation of new operating model for leisure reducing management and staffing costs resulting in reduction of deficit(subsidy) to @ £1.2m</p> <p>Marketing of ECC leisure membership delivering increases in membership @11,000.</p>	3	2	6	<p>Further review of leisure operating model to be undertaken October 2024 by new Head of Service being recruited as part of the Senior Leadership Restructure.</p> <p>Funding from Sport England being sought for 2025/2027 through Place Partnership bid awaiting final decision September 2024.</p> <p>Leisure service Built Facilities Strategy due for initial review by SMB September 2024</p>	March 2025

Corporate Risk Register

APPENDIX A

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Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		

Corporate Risk Register

APPENDIX A

						Review Month:			September 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		

3	<p>Adapting the council workforce to ensure appropriate skills and experience (Developing a future proof workforce)</p> <p><u>Challenges</u></p> <p>AI, robotics and digitisation technologies require acquisition of new knowledge, skills and competencies and with an aging workforces whose demographics is not reflective of the diversity of the city's population; some national shortages of some professional roles and a growing trend to more remote and hybrid working the council needs a new approach to workforce development, recruitment and retention.</p> <p><u>Potential Impacts</u></p> <ul style="list-style-type: none"> • Workforce and service delivery models not meeting the needs of customers leading to poor outcomes and inefficient, unaffordable services. • High levels of agency and consultancy spending. • Low staff morale and poor recruitment and retention • Loss of reputation of the Council
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Corporate Risk Register

APPENDIX A

						Review Month:			September 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
	August 2024 risk updated by Strategic Director People	Deputy Leader, Officer Lead: Strategic Director, People	3	3	9	<p>Market supplement scheme in place</p> <p>Apprenticeship opportunities for new and existing staff</p> <p>Senior Leadership restructure created new Strategic Director for People</p> <p>A review of pay structure will be completed by December 2024.</p> <p>External review of HR and OD functions and a mini-Peer Reivew into Equality, Diversity and Inclusion both completed by June 2024 providing a clear route map for organisational transformation a route map for total transformation</p> <p>Recommendations are being taken forward into a</p>	2	3	6	<p>July 2024 Strategic Director appointed with responsibly for OD, HR and customer and digital transformation.</p> <p>A new Head of Service HR and OD to be permanently recruited; external Interim Head commencing in September 2024 for 6 months to lead the implementation of the transformation plan.</p> <p>Successful negotiations with Strata completed to bring forward replacement of current ITrent (HR and payroll system) with enhances cloud-based functionality agreed to underpin HR and OD transformation programme.</p>	Sept 2025

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						transformation plan: outcomes will include a new operating mode for HR and OD functions better aligned to supporting the business needs and leading on policy and people development. Improved management information to enable effective performance monitoring on a wide range of people data, mandatory training and team and staff performance. A workforce development strategy underpinned by a skills audit and analysis to enable succession planning and future recruitment, retention and training strategies.					
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4	<p>Maintaining the Financial Sustainability of the Council</p> <p><u>Challenges:</u></p> <ul style="list-style-type: none"> - Inability to deliver £5.1m savings target over four year period (to 2027-28); - Inability to obtain and maintain Business Rates income at levels currently generated; - Policy, regulatory or legislative changes which are not fully funded from central govt; - Impact of high inflation, rising interest rates and other external economic factors; - Potential for Local Government Finance redistribution (including a reset of Business Rates); <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> - Significant reductions required to Statutory Services, which become unable to function legally; - Unable to balance budget, Government intervention required; - Larger than anticipated reductions (in year or over longer term). - Reduction in reserves below minimum level; - Impacts on council services and therefore resident outcomes.
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Corporate Risk Register

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	January 2018	Leader of the Council Officer Lead: Strategic Director Corporate Resources	4	4	16	<p>Detailed MTFP assessed and agreed with Members;</p> <ul style="list-style-type: none"> - One Exeter plan agreed and being implemented with suitable governance arrangements in place; - Budget for 2024 - 25 agreed; - Significant investment in city centre regeneration; - Appropriate level of unringfenced general fund reserves to protect against shocks; - Identify and bid for alternative sources of funding; - Lobby government for relaxation of council tax increase restrictions; - The Council has a clear strategy to address the savings required. 	2	4	8	<p>Sep-24 Review of initial Service Proposals complete; New 5 stage Strategy being developed; Timetable has been updated and considered by SMB. Work with members to start in September</p>	Feb-25

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5	<p>Maintaining the Council's Property and Infrastructure Assets</p> <p><u>Challenges:</u></p> <ul style="list-style-type: none"> • Council owns 100 operational properties and 600 Commercial Properties as well as 28 Bridges, 50 Parks, 90 Play Areas Footpaths, Highways, walls and a River, Canal and other watercourses • Shortages of materials and labour causing delay and increased costs across the capital programme • Interest Rate rises causing the cost of borrowing to rise significantly • Additional Borrowing adds pressure to the financial stability of the Council. <p><u>Potential impacts:</u></p> <ul style="list-style-type: none"> • Increased costs to Council • Sheer number of assets extremely high for a District Council, potential to cause significant financial harm • Delay in all projects, predominantly the condition survey projects and HRA programme, leading to prolonged periods of buildings being below the standard the Council is aiming for
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Corporate Risk Register

APPENDIX A

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	August 2021	Leader of the Council Officer Lead: Strategic Director Corporate Resources	4	4	16	<ul style="list-style-type: none"> Consider Programme of Asset rationalisation, where maintenance costs are uneconomic; Identify alternative sources of funding to reduce reliance on borrowing; Commercial Properties mainly let on a full repairing lease basis Reviewed existing capital programme to defer and remove schemes. Change of emphasis to internally borrow in the short term to offset interest rate rises. 	4	3	12	<p>The two property maintenance teams have now been merged under one Head of Service. This will allow a review of resources to take place and the sharing of good practice.</p> <p>Some significant projects are now either beginning or at the detailed planning stage and progress is being made with the capital programme.</p> <p>Work has taken place to realign the available resources with the planned programme over the next two years</p>	Feb 26

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6 Delivering Housing and Building Great Neighbourhoods and Communities

Challenges:

- brownfield first approach is the most sustainable option, and aligns with government policy but most sites are currently unviable and developers are unwilling to invest, resulting in sites being stalled
- inadequate infrastructure funding for brownfield land regeneration
- lack of specialist staff resources to support the work
- inability to address complex land assembly and infrastructure challenges
- significant abnormal costs associated with this type of programme
- low land/property values and lack of investment appetite (especially BtR sector)
- Significant local community opposition to development

Potential impacts:

- significant loss of income to fund services/infrastructure (CIL; S106; NHB; Council Tax; Business Rates) and inability to secure external funding from government
- increased traffic congestion and net-zero not achieved by 2030
- Exeter Plan found unsound resulting in city housing needs not being met and exacerbating the Devon Housing Crisis, especially in terms of affordable housing; lack of 5-year housing supply resulting in loss of planning control/sub-optimal development and loss of green space/special characteristics of Exeter.
- new neighbourhoods not created, existing communities become unbalanced and suffer from lack of infrastructure/services, and economy of the city is stalled
- active travel and accessible city aspirations not met
- unsustainable development and new homes do not meet Garden City principles
- housing built on greenfield sites

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	November 2021	Leader of the Council Officer Lead: Strategic Director for Place	4	4	16	<p>Access to government funding programmes (Brownfield Land Release Fund; Garden Communities; One Public Estate; New Development Corporations Competition Fund) is supporting Liveable Exeter and Council Owned Building projects</p> <ul style="list-style-type: none"> - Project management capacity brought in - Preparation of business cases, feasibility studies, development frameworks for strategic sites (E.g. Marsh Barton, Southgate, Water Lane, red Cow & City Point) - Acquiring land and property using CPO powers and dispose of land to enable infrastructure. - Use of CIL and S106 funding to support infrastructure provision. 	4	4	16	<p>Water Lane Design Code adopted by Council as SPD (July 2024); Mary Arches car park marketing exercise completed; Council Owned Building programme providing new council houses for tenants is continuing with Hamlin Gardens due to be completed this Autumn and Vaughan Road (Phase 1) next year; Devon Housing Commission final report published; the government has published a series of proposed planning reforms.</p>	On going

Corporate Risk Register

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						<ul style="list-style-type: none"> - Through the Exeter Design Quality Partnership adopt an enabling and collaborative culture with developers and landowners, instilling confidence in the planning process. - Enhanced Member Training to improve quality of decision making in planning. - Exeter Place Partnership established to bring together the city's institutions to take ownership of the city vision and aspirations and to work collectively on obstacles to delivery 					

Corporate Risk Register

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7	<p>Maintaining a thriving Culture and Heritage sector</p> <p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> • A need to balance cultural ambition with the national funding picture and local financial challenges • A need to support Visit Exeter as a vital mechanism for promotion of events, business and cultural offer. <p>Ensuring culture is relevant to all of Exeter's communities</p> <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> • Loss of NPO funding • Loss of wider impact of cultural regeneration of the city. • Inability to support night time economy • Inability to support cultural sector • Inability to deliver services including RAMM, Corn Exchange, Red Coats, Custom House, Underground Passages, Box Office • Non-renewal of UNESCO status • Reputational impact locally, nationally and internationally
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	May 2023	Deputy Leader Officer Lead: Strategic Director for Place	3	3	9	Strong relationship with Arts Council England and stakeholders. New five year Cultural Strategy being developed with tangible deliveries. Significant cultural assets owned and run by the cultural sector. UNESCO City of Literature status awarded and monitored. Funding agreed with ACE until 2026 with Exeter's National Portfolio Organisations	1	2	2	Sept 2024: New Head of Culture appointed. Executive to receive a report in October to extend NPO funding for a further year, to 2026-2027. SMB to agree scope for the new Cultural Strategy.	Oct 24

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8	<p>Delivering against the key challenges in the 'Prosperous Local Economy' section of the Corporate Plan.</p> <p><u>Key challenges:</u></p> <ul style="list-style-type: none"> • Retention and recruitment, with some difficult-to-fill vacancies, which is stifling business growth. • A rise in residents becoming economically inactive, particularly those in the 50+ age groups. • Matching the learning and skills opportunities for residents with current and future job opportunities. • Low levels of graduate retention from the University of Exeter. • Levels of aspiration amongst our young people and limited awareness of opportunities. <p><u>Potential Causes:</u></p> <p>Following budget reductions in April 2019 and the discretionary services review implemented in April 2023 there is no longer an economic development service or skills function. Both discretionary services have ceased and there is no officer resource or budget to progress this corporate priority.</p> <p>Upcoming In Exeter BID vote in October 20204, is unsuccessful.</p> <p><u>Potential Impacts:</u></p> <p>Exeter's economic base is weakened</p>
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Corporate Risk Register

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	May 2023	Deputy Leader Officer Lead: Strategic Director for Place	3	4	12	Partnership work with the University and Exeter College to take on more of a leading role in this area. New focus on the city centre economy. Close working with InExeter and other key partners, especially in relation to the city centre.	3	3	9	Sept 2024: Initial consultation on a new City Centre Strategy, undertaken in July 2024.	Mar 25

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9 Progressing the design and delivery of a corporate Customer and Digital Strategy

Challenges

- Digital technology continues to change the way people live, connect and work and this shift has been expedited by the Covid-19 pandemic. Digital technology continues to evolve at a rapid pace and for many have become an essential part of everyday life.
- People expect easy access to joined-up information and efficient, secure services in the palm of our hand; increasingly expecting to interact with organisations wherever they like, whenever they like, on whichever device they have and on whatever channel they choose.
- With customer behaviour changing faster than ever, the task of digital transformation demands significant changes to people, processes and technology. Our key challenges are the pace and scale of transformation needed in business processes; functional and organisational structures; culture; skills and resources within the Council and within and between Strata and our partner councils.
- We are currently lagging many other Councils in our development of digital services and how we engage with our customers to improve and develop them. We have identified this as a priority to address in the One Exeter programme.

Potential Impacts

- Failure to agree and implement the required level of organisational change will impact on the ability of the Council to deliver a balanced MTFP which requires transformational change in how services are delivered.
- Workforce and service delivery models not meeting the needs of customers leading to poor outcomes and inefficient, unaffordable services.

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- High levels of agency and consultancy spending.
- Low staff morale and poor recruitment and retention
- Loss of reputation of the Council

April 2024: New risk: Cyber Security: There is increased global concern about the use of AI and emerging technologies for malign purposes. Whilst there are no specific new threats nationally or regionally in relation to Local Government and we have no specific concerns about current systems and processes, Strata Directors have requested the company to undertake a risk awareness and management workshop with the Directors of all 3 Councils to provide assurances that there is sufficient capability and capacity to understand and mitigate risks and respond should a "never event" occur. This process is due to complete in October 2024 and until this process has been completed and assurances /action plans adopted this issue will remain on the Corporate Risk Register.

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	May 2023 updated by Strategic Director August 2024	Leader of the Council Officer Lead: Director for People	4	4	16	<p>Improved control of ICT Business Change Requests resulting in better use of valuable Strata resources.</p> <p>Customer Digital Strategy approved by Council in November 2023 sets clear direction around 10 outcome goals.</p> <p>June 2024 successful implementation and roll out of Microsoft 365 and the uses of Teams for improved communication and collaboration. New member SharePoint site designed and delivered.</p> <p>One Exeter a single integrated transformation programme across the Council, with strong</p>	2	4	8	<p>Outcomes from 2023/24 One Exeter projects has informed the Senior Leadership restore currently being implemented which breaks down service silos and introduces a customer-centric culture to underpin functional and structural integration across the Council</p> <p>Deeper collaboration and development of shared approaches and services with Strata, Teignbridge and East Devon District Councils resulted in Strata 2024/25 Business Plan approved setting out investments in key enablers to underpin the council's strategy.</p> <p>One Exeter programme priorities for 2024/25 include approval of new Data Strategy, roll out of SharePoint file management system, introduction of single sign on customer accounts,</p>	Mar-26

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						leadership from SMB and the Extended Leadership Team, refocused on fewer but more strategic organisational change programmes.				implementation of new telephony to replace SKYPE, implementation of new Customer Relations Management System and Middleware technology to facilitate the integration of customer data from line of business systems to enable "one view of the customer"; updated ITRENT HR and Payroll systems, new HR and Performance SharePoint sites and end user computing to negate the need for continued use of Global Desktop transferring to more reliable and agile cloud based systems..	

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Corporate Risk Register – Summary

APPENDIX B

Corporate Plan Alignment Area	Risk Description	Risk Scoring		
		Inherent	Residual	Target Date
Net Zero Carbon City	Delivering against the key challenges in the Net Zero Carbon City section of the Corporate Plan	16	16	Apr-30
Healthy and Active City	Making progress towards a Healthy and Active City	12	6	Mar- 2025
Leading a Well-run Council	Adapting the council workforce to ensure appropriate skills and experience (Developing a future proof workforce)	9	6	Sep-25
Leading a Well-run Council	Maintaining the Financial Sustainability of the Council	16	8	Feb-25
Leading a Well-run Council	Maintaining the Council's Property and Infrastructure Assets	16	12	Feb-26
Housing and Building Great Neighbourhoods	Delivering Housing and Building Great Neighbourhoods and Communities	16	16	On going
Thriving Culture and Heritage	Maintaining a thriving Culture and Heritage sector	9	2	Oct 24
Prosperous Local Economy	Delivering against the key challenges in the 'Prosperous Local Economy' section of the Corporate Plan.	12	9	Mar 25
Leading a Well-run Council	Progressing the design and delivery of a corporate Customer and Digital Strategy	16	8	Mar-26

Internal			
Resources			
T	F	P	A
H	H	H	H
M	M	H	H
M	H	L	VL
H	L	H	VL
VH	VH	H	VH
VH	H	M	L
M	H	H	M
L	L	L	L
H	H	H	H

External					
Risk Drivers for Appetite					
F	Rep	Reg	L	Comp	Comm
L	VH	VL	VL	L	H
L	VH	L	L	L	H
VH	VH	M	M	M	VH
VH	VH	VH	VH	VH	VH
VH	H	H	VH	VH	VH
H	VH	H	H	H	VH
H	M	H	L	L	M
VH	H	M	L	L	VH
H	M	M	L	L	M

Risk Appetite Rating
Cautious (M)
Open to Risk (H)
Open to Risk (H)
Cautious (M)
Cautious (M)
Open to Risk (H)
Cautious (M)
Open to Risk (H)
Open to Risk (H)

Key

Resources	
T	Time
F	Financial
P	People
A	Assets
Risk Drivers for Appetite	
F	Financial
Rep	Reputational
Reg	Regulatory
L	Legal
Comp	Compliance
Comm	Community
Risk Appetite Rating	
VL	Very Low
L	Low
M	Medium
H	High
VH	Very High

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Strategic Director for Corporate Resources

Title: Overview of General Fund Revenue Budget 2024/25 – Quarter 1

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To advise Members of the overall financial position of the General Fund Revenue Budgets for the 2024/25 financial year after three months.

2. Recommendations:

2.1 It is recommended that Members of the Executive note the report and Council notes and approves (where applicable):

- (1) The General Fund forecast financial position for the 2024 financial year;
- (2) The supplementary budgets and budget transfers as detailed in paragraph 8.11 and Appendix 3;
- (3) The outstanding Sundry Debt position as at June 2024;
- (4) The creditors payments performance; and
- (5) The One Exeter programme update

3. Reasons for the recommendation:

3.1 To formally note the Council's projected financial position and to approve additional expenditure required during the financial year.

4. What are the resource implications including non financial resources?

4.1 The impact on the General Fund working balance is set out in section 8.10.

4.2 The General Fund Working Balance is projected to stand at £3.739 million at year end.

5. Section 151 Officer comments:

5.1 Whilst in overall terms, the Council is projecting a reduction in the take from the General Fund Balance, there are some areas of pressure in the General Fund budget, which Officers and Members must continue to monitor. These are set out in the report. Given the changes in the Council, work is being undertaken to align the reporting with the new management structure in time for the second quarter.

6. What are the legal aspects?

6.1 Section 28 of the Local Government Act 2003 imposes a statutory duty on the Council to monitor during the financial year its expenditure and income against the budget calculations. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such action as it considers necessary to deal with the situation. This might include, for example, action to reduce spending in the rest of the year, or to increase income, or to finance the shortfall from reserves.

6.2 The Local Government Finance Act 1992 places a legal requirement on Council to approve not only the budget but also any changes to the budget proposed during the year. Council has a legal duty to ensure that the budget is balanced and that any changes to the budget are fully funded.

7. Monitoring Officer's comments:

7.1 The purpose of this report is to advise Members of the overall financial position of the General Fund Revenue Budgets for the 2024/25 financial year after three months. Members will note the statutory duty imposed on the Council to monitor expenditure and income against the budget calculations as set out in the legal aspects above.

8. Report details:

Overview of General Fund Revenue Budget 2024/25 – Quarter 1

8.1 Financial Summary

FUND	Planned Transfer To / (From) Working Balance £	Budget Variance (More) / Less £	Outturn Transfer 2024/25 £
General Fund	(2,812,491)	669,066	(2,143,425)

8.2 General Fund (Appendix 1 & Appendix 2)

The current forecasts show an overall projected underspend of £866,870 against a revised budget of £22,986,640. This includes supplementary budgets of £6,235,860 already agreed by Council. Variances of more than +/- £30,000 are detailed below:

8.3 Chief Executive

Budget Heading	Over / (Underspend)
Strategic Management	(£232,440)
<p>Responsible Officer: Strategic Director – Corporate Resources</p> <p>This underspend is due to the recent senior leadership restructure, resulting in a reduction in the number of directors. One post (Strategic Director – Community) is currently vacant and is being covered by two interim Directors; these costs will reduce this underspend in future quarters.</p>	

8.4 City Development

Budget Heading	Over / (Underspend)
Housing Needs and Homelessness	£350,000
<p>Responsible Officer: Service Lead, Housing Needs & Homelessness</p> <p>Exeter has seen a 25% increase in budgeted costs for temporary accommodation (TA) in the last quarter due to increased homelessness including rough sleeping.</p> <p>Nationally the number of households in TA has increased by 89% in the last 10 years. Rough sleeper numbers alone have risen by 27% nationally in the last 12 months. The vast majority of LHAs are reporting between 35% to 40% increases in TA costs over the 12 months ending March 2023.</p> <p>As a result of the city’s commitment to developing its homelessness supported housing resource the Council’s increase in demand for TA is below the national average. However, this new demand forecasts an additional net cost of approximately £137k. The relocation of 16 units a local B&B used for ECC TA to a contracted city centre hotel has also temporarily increased net costs by an estimated £160k for the year due to higher room prices and enhanced security need.</p> <p>Further increased spends are forecast on the leased property budgets being used to accommodate increased demand for TA. This is due to net costs in respect of leases, housing management and security. The former night shelter premises is also forecast to overspend due to rental income ceasing when the project was decanted and mothballed at the end of May due to operational issues and the need to prepare for hand-back of the lease. The lease is currently being re-negotiated to establish a rent-reduction in preparation for winter use. It is anticipated that these costs will be met through the provision of supplementary central govt grants. In recent years these have been provided for winter rough sleeping, RSI, and homelessness prevention. At this stage grants have not yet been confirmed but are anticipated to be in the region of £200k.</p> <p>A new 12-bed TA property on long lease to the Council is scheduled to be fully operational by 1st November which will help reduce the use of high-cost commercial hotels. An additional 8-bed property is targeted to be operational by 1 April 2025. Both these measures along with substantive cost reductions scheduled for all leased TA properties due to be procured onto a long-leasing regime should lead to a sustained reduction in net cost to the Council from 2025/26 onwards.</p>	

Planning	£0
<p>Responsible Officer: Service Lead, City Development</p> <p>Although the overall forecast variance is zero this is made up of two large variances:</p> <p>There is a forecast reduction in fee income of £250,000, this can be attributed primarily to a decline in the overall number of planning applications submitted. In the 2022/23 financial year, we processed 1,482 applications, whereas in 2023/24, this number decreased to 1,289, representing a reduction of approximately 13%. Notably, householder applications, which we receive more than any other type, have dropped from 403 to 311 during this period. This decrease in application volume, particularly in the householder category, has offset the increase in planning fees, leading to a net reduction in overall fee income. The reduction in application numbers is likely influenced by broader economic factors, including the current economic uncertainty and the cost-of-living crisis. Rising interest rates and inflation have created a more challenging financial environment, making both developers and homeowners more cautious about investing in new projects. Additionally, the increased costs of materials, labour, and energy have likely deterred many from pursuing home improvements or new developments. This economic climate, coupled with a slowdown in the housing market, where property values and demand have become more uncertain, may have led to a decrease in planning applications as potential applicants delay or reconsider their plans.</p> <p>The timetable for the Exeter Plan continues to respond to complex consultation responses, evidence requirements and national planning policy reforms meaning the projects is extending into multiple financial years. Significant evidence has been commissioned which continues to support the Exeter Plan, although the project is likely to be underspent by £250,000 in 2024/25. A supplementary budget will be requested for 2025/26 when the plan is scheduled to go through its examination and substantial costs will be incurred.</p>	

8.5 Communications, Culture and Leisure Facilities

Budget Heading	Over / (Underspend)
Markets & Halls	(£44,080)
<p>Responsible Officer: Facilities & Markets Manager</p> <p>The three areas within Markets & Halls (The Matford Centre, Markets and The Corn Exchange) have had a strong start to the year, with all three forecasting savings by year-end, in the areas of salaries and increased income - these savings are £89.2k, £4.6k and £60k respectively. However, this total has been materially reduced by the forecast loss of solar panel electricity income at the Matford Centre. This loss is predominantly due to the fall in market prices of exported energy and poor weather conditions in comparison to last year; however, there are also some delays in the repair of damages to the array which is hampering the operation of the panels. This will be continuously monitored and the loss may be reduced the further into the financial year we go.</p>	
Museum Services	(£172,510)

Responsible Officers: Museum Services – Co-Leadership Team

The underspend in Museum Services is predominantly due to savings made against the utilities budgets. A consultant has been employed to carry out an efficiency review, to help identify defunct environmental systems and improve those that are in continuous use. Last year, this work reduced unit volume in both gas and electricity, equating to a cost saving of £59k. This work will continue until April 2025 and the savings used to offset the cost of the consultant and the associated expenditure needed to achieve further substantial efficiencies.

The underspend in RAMM has, however, been reduced by the shop forecast to be £45k overspent. Generating income from sales continues to be a challenge, with the roof work nearing completion, this should have a positive impact on retail income but predominantly in areas such as corporate hire and events. The future of the café is still in question, with the lease going out to tender shortly, so there are still significant challenges facing Museum Services in the coming year.

Leisure & Sport**(£129,000)****Responsible Officer (Interim): Head of Service – Culture**

Leisure have had a strong start to the year, with centres continuing to operate at maximum capacity. Savings of £187k are expected to be made in salaries, which are vacancies offset by the need for casual staff, increased hours etc. Leisure is on an active recruitment campaign with several new staff hopefully starting in the future – it is therefore likely this saving will change as the year progresses.

Supplies & services are forecast to make a saving of £71.4k and in addition, income is forecast to exceed budget by £154.4k. However, these positive variances have been offset by the estate still having to bear the costs for premises' maintenance, the cost of which is hard to forecast. This overspend is offset with a saving against the Assets Maintenance cost centre and assumes that the Assets team restructure will not be completed by year-end. Therefore, a £200,000 underspend has been reported in Corporate Property and an overspend in Leisure & Sport; again, this will be monitored throughout the course of the year and adjusted as necessary.

8.6 Net Zero Exeter and City Management

Budget Heading	Over / (Underspend)
Environmental Protection	(£304,610)
Responsible Officer: Service Lead – Environmental Health & Community Safety Vacancies within the Neighbourhood and Environmental Quality Teams are proving difficult to fill with a forecast of £175,000 across the Management Unit. Another year of higher-than-expected funding for Disabled Facilities Grants has also increased the administrative burden rechargeable to the grant allocation above budgeted levels by £65,000 whilst Monitoring Private Housing income continues to out-perform the budget by £50,000.	
Licensing, Food, Health & Safety	£123,770

Responsible Officer: Service Lead – Environmental Health & Community Safety

Home Call income continues to be the main issue within this Management Unit due to an unrealistic income target continuing to be set. Despite recent marketing campaigns generating new customers, sadly, valued service users have passed away which means that numbers have remained static, with income continuing to fall short of budget by some £123,000. In addition, the service is trying to mitigate the shortfall in Home Call income with new CCTV Monitoring contracts. Non-contractual overtime is currently high to maintain minimum operational staffing levels which is forecast to be some £42,000 over budget at year end, but this is presently being managed through vacancies within the Management Unit.

Domestic Waste Collection

(£338,530)

Responsible Officer: Service Lead – Waste, Recycling & Fleet

The service has suffered continuing operational difficulties as it struggles to recruit. In addition, there is a delay to further roll out of the doorstep food waste programme until the construction of the food waste bay, so there will be savings in the year due to vacancies and vehicles not yet being leased. These savings will more than offset the income the service is unable to claim from DCC's Share Scheme saving fund, to which we have no eligibility until the scheme achieves 100% coverage. The spend on agency staff is expected to reduce by £50,000 from last year's outturn of just under £300,000.

Engineering Services

(£307,420)

Responsible Officer: Service Lead – Public and Green Space

The team have had some success in recruiting to the vacancies seen over previous years and can continue to look forward to pursuing both revenue and capital schemes more actively as a result. There remain a number of vacancies which have been difficult to fill, where an underspend of £130,000 is predicted after allowing for the possible pay offer costing. The Waterways Engineer post, funded for a 3-year period from historic vacancy underspending, is proposed to be transferred to the Waterways team in a transfer request at Appendix 3 which would move £80,000 of the current underspend to that service. The use of sub-contractors across the service remains subdued with a forecast underspend of £86,000. Funding relating to the proposed demolition of an over-bridge is hoped not to be required.

Waterways

£69,340

Responsible Officer: Service Lead – Harbour Master

The Exeter Port Authority operates a mooring repairs service, purchased by the Council several years ago. The intention was for this to be self-financing, but costs had risen significantly whilst workload and income had not. The opportunity is still available but, without the introduction of the Harbour Revision Order (HRO) which is currently being progressed, improvement will be slow – the current forecast is for an underspend of £21,900 against a budgeted spend of £36,500 leaving a further £14,600 income still to be achieved for this service to reach breakeven.

Canal licences represent the other area of concern – income levels have stagnated in the opening quarter with few new vessels being kept in the canal. The forecast is for there to be a slight reduction in income in comparison with 2023/24, due to vessels being scrapped or leaving. Income will likely be some £63,000 below budgeted level.

Budget Heading	Over / (Underspend)
Corporate Property – Estates	£401,900
<p>Responsible Officer: City Surveyor</p> <p>Several properties in the Estates portfolio are currently vacant leading to a reduction in the expected annual rental income; this will be monitored throughout the year and adjusted as new tenants are found. This loss of income has been mitigated slightly by a £104.7k saving in the Estates team due to a vacancy and the City Surveyor leaving at the end of August.</p>	
Corporate Property – Assets	(£389,370)
<p>Responsible Officer: Head of Asset Maintenance</p> <p>A £200,000 budget was added in the 2023/24 financial year to cover the maintenance requirements of the leisure facilities. Unfortunately, due to the on-going restructure of the Assets team, this additional budget cannot be utilised at this time. A corresponding overspend has been forecast in the Leisure & Sport management unit. £189.4k is also being reported as an underspend against the establishment budget and will likely remain until recruitment starts and vacant posts in the new structure are filled.</p>	
Corporate	£51,650
<p>Responsible Officer: Strategic Director – Corporate Resources</p> <p>This overspend is due to various factors – an increase in external auditor fees, a forecast overspend on corporate bank charges and an overspend on subscriptions. A portion of the increased auditor fees and bank charges will be recharged to the HRA, leaving the above forecast figure.</p>	

8.8 Corporate Services

Budget Heading	Over / (Underspend)
Elections & Electoral Registration	£59,490
<p>Responsible Officer: Head of Legal & Domestic Services</p> <p>The overspend is predominantly in District Council Elections and is due to the reduction in Election budgets in 2023/24. The impact is mainly in the cost of casual staff needed on the day of the Election, although there is a small overspend in supplies & services</p>	
Human Resources	(£74,860)
<p>Responsible Officer: Interim Head of Human Resources (Operations)</p> <p>The current underspend relates to vacancies in the staffing establishment. There is also a projected underspend in the training budget. The budget will continue to be monitored, and it is anticipated that by year end it is likely that this underspend will be used.</p>	

Corporate Support	£148,820
<p>Responsible Officer: Head of Asset Maintenance</p> <p>As in past years, the adverse variance is due to a shortfall in rental income of £230k, expected from phase one tenants at the Civic Centre. This reduced income has been offset slightly by savings in premises cost and supplies and services (£93k in total). It is unlikely that this forecast will materially change unless new tenants are secured and the rental income increase. The mail room is also reporting a £17.3k overspend which is due to the cost of postage going over budget by £9.5k. Efforts are being made to recharge appropriate postage costs across to the tenants in phase one but this is proving difficult therefore a loss of £8.4k in recharge income is also expected.</p>	

8.9 Other Financial Variations

Budget Heading	Over / (Underspend)
Net interest	(£78,478)
<p>Interest payable remains on target. Interest receivable is expected to be £78k higher than budgeted as interest rates remain elevated.</p>	

8.10 General Fund Balance

In 2024/25 it is projected that there will be an overall net contribution from the General Fund Balance of £2,143,425. The minimum requirement for the General Fund working balance which was approved by Council in February 2024 at £3 million.

Movement	2024/25
Opening Balance, as at 01/04/24	£5,882,563
Net	(£2,143,425)
Projected Balance at Year End	£3,739,138

8.11 Supplementary Budgets

It is proposed that the supplementary budgets and budget transfers identified in Appendix 3 are approved and added to the 2024/25 budget.

- £48,240 will need to be funded by the general fund and will reduce the working balance.
- The remaining requests are all self-financing or funded from an earmarked reserve and will have no impact on the projected General Fund working balance.

8.12 Outstanding Sundry Debt

An aged debt analysis of the Council's sundry debts is shown in the table below:

Age of Debt	March 2023	March 2024	June 2024
Up to 29 days (current)	£1,436,904	£1,411,457	£2,336,334
30 days – 1 Year	£1,697,735	£2,738,947	£1,404,597
1 – 2 years	£1,645,793	£299,265	£452,887
2 – 3 years	£199,426	£273,541	£265,605
3 – 4 years	£539,002	£78,227	£106,200
4 – 5 years	£254,721	£290,834	£102,431
5 + years	£1,186,130	£340,009	£538,624
Total	£6,959,711	£5,432,280	£5,206,681

In November 2023 aged debt totalling £1.7m in respect of overpaid Housing Benefits was transferred from the ASH Sundry Debtors system to the IMAN system, a new system specifically to manage the recovery of overpaid Housing Benefits. The aged debt analysis in the above table therefore reflects outstanding sundry debtors.

8.13 Debt Write-Offs

The following amounts have been written-off during 2024/25:

	2023/24 Total	2024/25 (Qtr 1)
• Council Tax	£236,172	£82,776
• Business Rates *	£38,096	£0
• Sundry Debt	£2,238	£0
• Housing Rents	£93,187	£30,901
• Non-HRA Rents	£63,376	£15,769
• HB Overpayments	£191,856	£12,619

* Business Rate write offs dealt with annually

8.14 Creditor Payments Performance

Creditors' payments continue to be monitored in spite of the withdrawal of statutory performance indicator BVPI8. The percentage paid within 30 days was 96.21% for the first three months of 2024/25 compared with 94.79% after the first three months of 2023/24.

9. One Exeter Update

As Members will be aware, One Exeter is the Council's transformation programme and is a critical priority for the council.

A progress report was presented to Executive in February 2024. The report provided an annual summary of progress against the One Exeter Programme and set out a series of proposed outcomes for the following 12 months. Alongside this, work will start shortly on identifying cost reduction proposals for 2025/26.

Appendix 5 sets out how the Council is performing against the 2024/25 cost reductions. At the end of Quarter 1, it is forecast that £179k of the £1.402m will not be achieved, of which £157k relates to planning fee income. Planning fee income will therefore be subject to close monitoring by officers as an area of budgetary risk.

The Council's medium term financial plan anticipates reserves being reduced to the minimum required by the end of 2024/25 and further budget reductions of £3.5m are required in 2025/26. Work has now started on identifying cost reduction proposals, which includes the cost reductions identified through the service reviews undertaken in December 2022.

Since the last update, work has started on reviewing the council's Corporate Plan to ensure that it is focussed on outcomes. Progress against the agreed outcomes will be measured and these measures will help to form the basis of a corporate performance management framework.

The LGA has worked with the council to undertake a review of how the council complies with its responsibilities under the Equalities legislation and whether there are opportunities to improve. The findings of the review have been fed back to the council and will be addressed through the One Exeter programme.

The Strategic Management Board and Operational Management Board (known as the Extended Leadership Team) are working together to develop proposals for making cost reductions in 2025/26.

Work continues with the implementation of the new Senior Leadership Structure. The internal recruitment process has been completed and work has now started to recruit externally to any unfilled positions.

10. How does the decision contribute to the Council's Corporate Plan?

This is a statement of the projected financial position to the end of the 2024/25.

11. What risks are there and how can they be reduced?

The risks relate to overspending the Council budget and are mitigated by regular reporting to the Strategic Management Board and Members. Members have a legal responsibility to take action where balances are projected to reach an unsustainable level and the Strategic Management Board are working to address the current projected shortfall in reserves.

Areas of budgetary risk are highlighted in this report. The key areas of budgetary risks are attached as Appendix 4, for reference.

12. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because: because

11.4.1 There are no significant equality and diversity impacts associated with this decision.

13. Carbon Footprint (Environmental) Implications:

There are no direct carbon/environmental impacts arising from the recommendations.

14. Are there any other options?

Not applicable.

Strategic Director for Corporate Resources & S151 Officer, Dave Hodgson

Authors: Nicola Morley, Bridget Kendrick, and Mark Neville-Smith

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:

None

Contact for enquires:

Democratic Services (Committees)

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2024/25 GENERAL FUND BUDGET MONITORING - SUMMARY

QUARTER 1

	Original Budget £	Supplementary Budgets & Transfers £	Revised Budget £	Year End Forecast £	Variance to Budget £
Chief Executive	1,156,000	(1,460)	1,154,540	913,920	(240,620)
IT & Transformation	2,350,590	303,840	2,654,430	2,654,430	0
City Development	2,812,790	1,301,320	4,114,110	4,464,110	350,000
Communications, Culture and Leisure Facilities	5,849,580	2,751,000	8,600,580	8,272,550	(328,030)
Net Zero Exeter and City Management	5,451,200	753,630	6,204,830	5,450,980	(753,850)
Finance	1,271,680	1,128,520	2,400,200	2,475,190	74,990
Corporate Services	2,999,140	(990)	2,998,150	3,028,790	30,640
less Notional capital charges	(5,140,200)	0	(5,140,200)	(5,140,200)	0
Service Committee Net Expenditure	16,750,780	6,235,860	22,986,640	22,119,770	(866,870)
Net Interest	1,406,000		1,406,000	1,327,522	(78,478)
Revenue Contribution to Capital	0		0	198,470	198,470
Minimum Revenue Provision	1,831,020		1,831,020	1,904,733	73,713
General Fund Expenditure	19,987,800	6,235,860	26,223,660	25,550,495	(673,165)
Transfer To/(From) Working Balance	(1,313,430)	(1,499,061)	(2,812,491)	(2,143,425)	669,066
Transfer To/(From) Earmarked Reserves	337,000	(4,610,439)	(4,273,439)	(4,269,340)	4,099
General Fund Net Expenditure	19,011,370	126,360	19,137,730	19,137,730	0
Formula Grant	(6,291,000)		(6,291,000)	(6,291,000)	0
CIL Income	(781,000)	(126,360)	(907,360)	(907,360)	0
Business Rates Growth / Pooling Gain	(4,283,880)		(4,283,880)	(4,283,880)	0
New Homes Bonus	(485,920)		(485,920)	(485,920)	0
Council Tax	(7,169,570)		(7,169,570)	(7,169,570)	0
0	0	0	0	0	0

Working Balance March 2024

£ 5,882,563

£ 3,739,138

March 2025

2024/25 GENERAL FUND BUDGET MONITORING - DETAIL
QUARTER 1

ACTUAL TO DATE			YEAR END FORECAST			
PROFIED BUDGET	ACTUAL TO DATE	VARIANCE TO DATE	APPROVED BUDGET	CURRENT OUTTURN FORECAST	FORECAST VARIANCE	
£	£	£	£	£	£	
5,820,490	6,101,765	281,275	TOTAL GENERAL FUND NET EXPENDITURE	28,126,840	27,259,970	(866,870)
Chief Executive						
0	4,294	4,294	AFFORDABLE HOUSING DEVELOPMENT	4,940	14,020	9,080
88,134	80,112	(8,022)	CENTRAL SUPPORT	354,940	337,680	(17,260)
91,626	247,839	156,213	STRATEGIC MANAGEMENT	794,660	562,220	(232,440)
179,760	332,245	152,485	NET EXPENDITURE	1,154,540	913,920	(240,620)
IT & Transformation						
731,856	707,884	(23,972)	IT SERVICES	2,411,430	2,411,430	0
88,889	50,558	(38,331)	ORGANISATIONAL CHANGE PROGRAMME	243,000	243,000	0
820,745	758,442	(62,303)	NET EXPENDITURE	2,654,430	2,654,430	0
City Development						
(624,477)	(616,224)	8,253	HOUSING NEEDS & HOMELESSNESS	1,839,920	2,189,920	350,000
0	0	0	SUNDRY LANDS MAINTENANCE	112,300	112,300	0
49,901	40,438	(9,463)	GF HOUSING - PROPERTY	199,800	199,800	0
(8,842)	11,961	20,803	BUILDING CONTROL & LAND CHARGES	65,520	65,520	0
235,116	350,234	115,118	PLANNING	1,219,210	1,219,210	0
169,340	201,770	32,430	LIVEABLE EXETER GARDEN CITY	677,360	677,360	0
(178,962)	(11,821)	167,141	NET EXPENDITURE	4,114,110	4,464,110	350,000
Communications, Culture and Leisure Facilities						
95,747	81,913	(13,834)	CULTURE	383,450	383,960	510
(58)	8,548	8,606	TOURISM	0	0	0
(99,020)	(410,689)	(311,669)	MARKETS & HALLS	(463,670)	(507,750)	(44,080)
556,536	349,447	(207,089)	MUSEUM SERVICE	2,435,350	2,262,840	(172,510)
713,105	517,291	(195,814)	LEISURE & SPORT	2,800,430	2,671,430	(129,000)
333,901	332,210	(1,691)	ACTIVE & HEALTHY PEOPLE	2,067,960	2,067,960	0
14,963	0	(14,963)	ST SIDWELLS POINT	59,850	59,850	0
34,727	10,308	(24,419)	VISITOR FACILITIES	86,000	77,160	(8,840)
80,652	89,177	8,525	COMMUNICATIONS	226,330	252,220	25,890
209,690	202,346	(7,344)	EXETER COMMUNITY GRANTS PROGRAMME	1,004,880	1,004,880	0
1,940,243	1,180,551	(759,692)	NET EXPENDITURE	8,600,580	8,272,550	(328,030)
Net Zero Exeter & City Management						
146,605	13,333	(133,272)	ENVIRONMENTAL PROTECTION	657,690	353,080	(304,610)
177,757	198,653	20,896	LICENCING,FOOD,HEALTH & SAFETY	820,010	943,780	123,770
490,636	461,718	(28,919)	PARKS & GREEN SPACES	1,994,270	1,968,780	(25,490)
31,844	32,157	313	BEREAVEMENT SERVICES	118,190	116,530	(1,660)
716,237	598,575	(117,662)	DOMESTIC REFUSE COLLECTION	3,673,000	3,334,470	(338,530)
419,889	437,210	17,321	STREET CLEANING	1,699,490	1,717,920	18,430
49,702	66,765	17,062	PUBLIC CONVENIENCES	226,330	239,900	13,570
(145,950)	(212,657)	(66,707)	WASTE CHARGEABLE SERVICES	(430,410)	(454,260)	(23,850)
62,563	72,440	9,878	WASTE AND FLEET OVERHEADS	193,620	203,730	10,110
238,707	258,761	20,053	RECYCLING	857,010	883,610	26,600
(573,635)	(409,147)	164,488	PARKING SERVICES	(6,148,760)	(6,141,930)	6,830
151,400	73,066	(78,334)	NET ZERO AND BUSINESS	969,710	948,770	(20,940)
233,421	55,079	(178,342)	ENGINEERING SERVICES	1,029,830	722,410	(307,420)
117,167	120,361	3,194	WATERWAYS	544,850	614,190	69,340
2,116,344.42	1,766,313.40	(350,031)	NET EXPENDITURE	6,204,830	5,450,980	(753,850)
Finance						
(1,418,179)	(759,863)	658,316	CORPORATE PROPERTY - ESTATES	(5,206,580)	(4,804,680)	401,900
229,113	763,694	534,581	MAJOR PROJECTS	916,450	916,450	0
375,835	186,920	(188,915)	CORPORATE PROPERTY - ASSETS	1,091,720	702,350	(389,370)
862,836	872,163	9,327	REVENUES, BENEFITS & CUSTOMER ACCCESS	3,161,470	3,161,470	0
77,267	81,068	3,801	CORPORATE	227,400	279,050	51,650
355,643	610,844	255,201	UNAPPORTIONABLE OVERHEADS	1,278,500	1,278,500	0
213,455	199,526	(13,929)	FINANCIAL SERVICES	682,570	682,570	0
36,183	43,094	6,911	INTERNAL AUDIT	117,780	126,170	8,390
56,540	49,791	(6,749)	PROCUREMENT	130,890	133,310	2,420
788,693	2,047,237	1,258,544	NET EXPENDITURE	2,400,200	2,475,190	74,990
Corporate Services						
0	(21,541)	(21,541)	TRANSPORTATION	0	(60,000)	(60,000)
97,163	(89,150)	(186,313)	ELECTIONS & ELECTORAL REG	390,130	449,620	59,490
78,909	68,466	(10,443)	CIVIC CEREMONIALS	356,750	357,670	920
167,375	157,956	(9,419)	DEMOCRATIC REPRESENTATION	671,120	649,340	(21,780)
201,278	175,148	(26,130)	HUMAN RESOURCES	681,790	606,930	(74,860)
165,315	153,297	(12,018)	LEGAL SERVICES	306,950	285,000	(21,950)
264,372	343,064	78,692	CORPORATE SUPPORT	591,410	740,230	148,820
974,412	787,240	(187,172)	NET EXPENDITURE	2,998,150	3,028,790	30,640

PROPOSED SUPPLEMENTARY BUDGETS & BUDGET TRANSFERS - QUARTER 1

Supplementary Budgets

Description	£	Funded by:
Shared Prosperity Fundi - Year 3 (of 3) Grant	(713,320)	Grant Funded
Shared Prosperity Fund - Expenditure	713,320	Grant Funded
CloudFinancials revenue costs	32,500	GF Balance
Chief Executive Support Officer - regrade & increase in hours	15,740	GF Balance
Mary Arches CP Redevelopment	10,000	Earmarked Reserve
General Fund Depreciation Budgets	44,720	Not applicable
Parlimenatary Elections - Government Grant (income)	(184,214)	Self-financing
Parlimenatary Elections - Government Grant (costs)	184,214	Self-financing
Reduce Enhanced Housing Options budget to match earmarked reserve budget	(15,530)	Earmarked Reserve
Total	87,430	

Budget Transfers



Engineering Waterways post from Engineering to Waterways	121,350
Glass Lorry Recycling round from Recycling to Domestic Waste Services	17,500





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2024/25 BUDGET MONITORING
AREAS OF BUDGETARY RISK



The table below notes service-areas that, based on either experience last year or market factors this year, have been identified as having significant budgetary risk within the 2024/25 revenue budgets.

The revenue budget areas of risk are:




Service	2024/25 Approved Budget	Risk Rating	Risk and mitigation
Chief Executive			
Strategic Management (Revenue)	£794,660		The forecast underspend is due to the recent restructure, which has resulted in a reduction of the number of directors. One Strategic Director post is currently vacant, with two Interim Directors in place until recruitment is completed.
City Development			
Planning Services Revenue	£937,590		<p>Several recent planning decisions have been appealed this year, some of which are very significant. Additionally, at least one case relating to a judicial review of a decision to grant planning permission remains unresolved, and at least one major planning inquiry is expected. This typically necessitates external consultancy and legal advice, which has historically led to significant expenditure in previous financial years.</p> <p>Moreover, there has been a noticeable decline in the number of planning applications submitted, resulting in a forecasted reduction in fee income by £250,000. This drop reflects the broader economic challenges currently faced, including economic uncertainty, rising interest rates, and increased materials and labour costs. This reduction in income poses an additional financial risk, requiring close monitoring and potential adjustments in budget planning.</p>

Service	2024/25 Approved Budget	Risk Rating	Risk and mitigation
Communications, Culture and Leisure Facilities			
Museum Service (Revenue)	£2,435,350		An energy consultant has been employed to identify and implement improvements to environmental systems, which has helped toward reducing energy costs. This work continues for the rest of the financial year and the forecast savings of £172,510 at quarter one is predominantly due to this project. However, there are still challenges facing Museum Services, including reduced sales income from the shop and a current vacancy for a café tenant.
Leisure & Sport (Revenue)	£2,800,430		All leisure centres continue to operate at maximum capacity, despite challenges in areas such as recruitment to permanent positions. The underspend against establishment is being used to cover the use of casual staff and currently, there is no indication that casual use will exceed the underspend due to vacancies. Income is forecast to exceed budget at this time; however, ongoing work on correct VAT recognition may reduce this surplus. The Leisure estate also continues to recognise the costs of premises maintenance, despite the Asset Maintenance team holding the budget. This situation is unlikely to change this financial year.
Net Zero Exeter and City Management			
Trade Waste Fees & Charges	(£1,284,880)		Realignment of Income for Trade Waste this year has made it a realistic proposition that this budget can be achieved. The Q1 forecast is for a 4% underachievement, equivalent to £50,000, but this takes no account of any improvement in debt recovery that can be achieved in year.
Car Parking Fees & Charges	(£9,397,320)		Realignment of Income, both for Season Tickets and Car Park Charges has meant that this risk has been mitigated in full based on performance in Q1 forecast through to the end of the year.

Service	2024/25 Approved Budget	Risk Rating	Risk and mitigation
<p>Control Centre Operations covering CCTV and Home Call Alarm Service Fees & Charges</p>	<p>(£453,730)</p>		<p>The Control Centre Operations, which covers the CCTV and Home Call Alarm Services, has been merged to a single risk area this year. Increased uptake of the CCTV monitoring service has seen expected income rise from £43,000 to £94,000, but this is still not sufficient to balance out ongoing issues with the Home Call Alarm Service where income from all sources, including the Housing Revenue Account, is projected to increase by only some £12,000 from last year's outturn of £230,000..Overall, performance is expected to be at 74% of budget, up from 66% across the same areas last year.</p>
<p>Finance</p>			
<p>Corporate Property – Estates (Revenue)</p>	<p>(£5,206,580)</p>		<p>There are a number of vacant properties within the Estates commercial portfolio, leading to a forecast deficit of rental income against budget. However, new tenants may be found, so this situation will continue to be monitored throughout the year. Savings against the staffing establishment has mitigated this loss and there is currently no forecast for the Guildhall Shopping Centre, which may also reduce the forecast overspend.</p>
<p>Corporate Property – Assets (Revenue)</p>	<p>£1,091,720</p>		<p>Two factors have led to the forecast underspend of £389,370 at quarter one. The new Assets restructure is in the final stages of job evaluation and recruitment can then begin; until this time, there are vacancies with the team. £200,000 has also been reported as a saving; this figure represents the budget that was added in 23/24 to manage the Leisure estate but which currently is not being utilised due to lack of resources. The risk is that the non-Leisure maintenance will overspend and some of this underspend will disappear.</p>

Service	2024/25 Approved Budget	Risk Rating	Risk and mitigation
Revenues and Benefits Housing Benefit Subsidy	£27,641,930		The Council currently administers over £27 million of Housing Benefit payments for rent allowances and rent rebates. Not all expenditure can be claimed back as subsidy. Certain supported and temporary accommodation costs are not eligible for full subsidy; these claim types will remain in Housing Benefit and not move to Universal Credit. As more Housing Benefit claims move onto Universal Credit the amount of unsubsidised expenditure will be an increased proportion of total expenditure. Errors made by ECC officers are not subsidised in full if they go over a set percentage of total expenditure. As total expenditure reduces due to Universal Credit rollout, the margins within which error payments are subsidised will reduce, increasing the risk of a subsidy loss in this area.
Corporate Services			
Corporate Support (Revenue)	£591,410		As in previous years, vacant space in Phase 1 of at the Civic Centre has caused a significant reduction in rental income. A savings against premises costs slightly mitigates this risk but the reported adverse variance is unlikely to materially change this financial year. Current plans to redevelop the Civic Centre may also potentially impact the forecast; however, it is too soon to identify the extent of this impact.

Risk Rating Key:

	Current forecasts indicate either a favourable variance compared to the budget or no variance at all
	Current forecasts indicate an adverse budgetary variance of between 0% and 5% that will be kept under review
	Current forecasts indicate an adverse budgetary variance of more than 5% and will be monitored closely

**Monitoring Budget Reductions - 2024/25
Quarter 1 Update**

Appendix 5

Service	Description/Proposal	2024/25 Budget Reduction/ (increase)	Quarter 1 forecast	Variance (shortfall)	Comment
Public and Green Spaces	Allotment fee increase	£20,450	£20,450	£0	Still on forecast, uplift in fees kicks in from 1st September
Public and Green Spaces	Street cleansing agile service delivery; saving profiled 50% in 2023/24 and 50% 2024/25	£101,850	£101,850	£0	Rounds have been reorganised and saving will be achieved
Procurement	Shared service with Teignbridge, South Hams and West Devon District Councils	£27,000	£5,000	(£22,000)	Only recharging TDC for maternity cover until the end of Sept 24. No other work planned.
Markets and Halls and Visitor Facilities	Additional income at Matford Centre	£8,500	£8,500	£0	Income will achieve budget so saving will be achieved
Revenue, Benefits and Customer Access	Move HRA Rent Collection back to Housing Tenancy Services. Reduce team to level required for HRA/or in-line with recharge level; delete 1 x Income Collection Team Leader 5 x Senior Collection Officers, 1 x Support (effectively removing officer costs met from the GF)	£172,920	£172,920	£0	Expenditure on budget at quarter 1
Revenue, Benefits and Customer Access	EDDC Hosted Council Tax Administration. Delete vacant Local taxation Lead and 3 hours from Post 5089	£55,680	£55,680	£0	Post deleted
Corporate Property	Estates functional review; remove Assistant Estates Surveyor post	£20,230	£20,230	£0	Post removed therefore saving achieved
Housing Needs and Homelessness	Reduction of spot purchase B&B accommodation; relating to unrecoverable HB in Welfare and Benefits	£80,170	£80,170	£0	Saving likely to be achieved but will be closely monitored.
SUB TOTAL SERVICE REVIEW REDUCTIONS		£486,800	£464,800	(£22,000)	
Marketing	Additional income	£25,000	£25,000	£0	Revenue is forecast to achieve budget so saving achieved

Leisure	VAT ruling Leisure is non-business for VAT	£600,000	£600,000	£0	Officers are working with external tax advisors to collate and submit a claim to HMRC for VAT previously paid over in respect of leisure income that can be reclaimed. The total claim value is still being calculated but is expected to achieve £600k, at this stage
Corporate	Reduction in Pension Added Years budget in line with reduced spending	£60,000	£60,000	£0	No overspend forecast so saving achieved
RAMM	Restructure per Council approval	£73,000	£73,000	£0	Restructure implemented so saving achieved
Planning	Additional income resulting from Central Government fee increase	£157,000	£0	(£157,000)	Fee increases have not led to the expected increase in income. Under-recovery of income forecast at quarter 1.
	OTHER PROPOSALS	£915,000	£758,000	(£157,000)	
	TOTAL	£1,401,800	£1,222,800	(£179,000)	

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Strategic Director for Corporate Resources

Title: 2024/25 General Fund Capital Monitoring Statement – Quarter 1

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To report the current position in respect of the Council's revised annual capital programme and to advise Members of the anticipated level of deferred expenditure into future years.

1.2 The report seeks Member approval to amend the annual capital programme in order to reflect the reported variations.

2. Recommendations:

2.1 It is recommended that Executive Committee supports and recommends to Council to approve:

(1) The overall financial position for the 2024/25 annual capital programme.

(2) The further funding requests to the Council's annual capital programme for 2024/25.

3. Reasons for the recommendation:

3.1. Local authorities are required to estimate the total of capital expenditure that it plans to incur during the financial year when it sets the prudential indicators for capital expenditure. This shows that its asset management and capital investment strategies are affordable, prudent, and sustainable.

3.2 Capital expenditure is a significant source of risk and uncertainty since cost variations, delays and changing specifications are often features of large and complex capital projects.

3.3 In order to manage the risks associated with capital programming the annual capital programme is updated every three months to reflect any cost variations, slippage, or acceleration of projects.

4. What are the resource implications including non financial resources

4.1 The financial resources required are set out in the body of this report.

5. Section 151 Officer comments:

5.1 Project managers have worked to better align the capital programme with the resources available. A new section has been added to the report to reflect schemes that have been approved, the funding is available but delivery is dependent on elements outside of the Council's direct control.

6. What are the legal aspects?

6.1 Monitoring of capital expenditure is required in order to comply with the provisions of the Local Government Act 2003.

6.2 The requirements imposed on the Council by the Act are set out in section 3 of the report.

7. Monitoring Officer's comments:

7.1 The Monitoring Officer has no additional comments.

8. Report details:

8.1. REVISIONS TO THE CAPITAL PROGRAMME

The 2024/25 Capital Programme, including commitments brought forward from 2023/24, was last reported to Executive on 25 June 2024. Since that meeting the following changes have been made that have increased the programme:

Description	£	Approval/Funding
Revised Capital Programme, as reported to Council 16 July 2024	27,966,310	
DEFRA Grant, new burdens funding for food waste collections	857,140	Approved by Council 16 July 2024
Mallinson	64,670	
Parks Infrastructure	70,020	
RAMM Roof Repair	185,000	
City Wall	85,000	
St Nicholas Priory Roof	88,120	

Green Space Depot Site	2,500,000	
Revised Capital Programme	31,816,260	

8.2. PERFORMANCE

The revised capital programme for the current financial year is £31.816 million. There are some schemes where the timing of the spend is uncertain, these schemes have a budget of £7.588 million, of the remaining £24.228 million budget the spend during the first three months of the year the Council was £1.541 million, which equates to 6.36% of the revised programme. This compares with £1.486 (2.12%) that was spent in the first three months of 2023/24.

The current programme is detailed in Appendix 1. For the schemes where the timing of the spend is within the control of the Council the Appendix shows a total forecast spend for 2024/25 of £18.536 million with £0.829 million of the programme potentially being deferred to 2025/26 and beyond.

Appendix 2 shows the approved budgets for 2025/26 with the proposed 2024/25 budget to be carried forward to 2025/26 and beyond for Executive and Council to consider for approval.

8.3. AVAILABLE CAPITAL RESOURCES

The available capital resources for the General Fund for 2024/25 are £15.499 million. An estimated spend of £18.836 million is required of which £5.603 million will be funded from borrowing with £1.618 million capital receipts carried forward to 2025/26.

Appendix 4 sets out the forecast use of the resources available for the General Fund and the likely amounts of borrowing that will be necessary to fund the capital programme over the next three years.

The actual capital receipts received in the quarter in respect of the General Fund are:

	General Fund £
Balance as at 1 April 2024	851
New Receipts	10,000
Balance as at 30 June 2024	10,851

8.4. EXPENDITURE VARIANCES

The main (greater than +/- £30k) variances and issues concerning expenditure are as follows:

Scheme	Variance £
Riverside & RAMM Decarbonisation Projects	(£4,860,850)
<p>Officer Responsible: Service Manager – Net Zero & Business Please see the separate report that is presented to this meeting on the Public Decarbonisation Scheme 3b Project which sets out the reasons for this scheme not going ahead. The budget was to be grant funded so this is not a saving of ECC funds.</p>	

8.5. SCHEMES TO BE DEFERRED TO 2025/26 AND BEYOND

Schemes which have been identified as being wholly or partly deferred to 2025/26 and beyond are:

Scheme	Budget to be Deferred £
Bowling Green Marshes Coastal Defence Scheme	50,000
Farm Hill Retaining Walls (23 no.)	150,000
Bonhay Rd/Andlaw House Footpath	69,810
St James' Weir & Ducks Marsh Meadow banks	75,000
Landfill Gas Extraction Systems	46,750
ECC Bridge Repair Programme	100,000
Oxford Road Car Park Retaining Wall	200,000
Canal Basin Bridge Refurbishment	50,000

Officer Responsible: Engineering & Assets Manager

Following an unsuccessful procurement exercise for the Bowling Green Marshes Coastal Defence Scheme an alternative approach has been selected that will increase the programme time into the net financial year.

The scope of the Farm Hill retaining walls project has significantly reduced since the budget was requested, we are currently awaiting tender process.

The Bonhay Road footpath project has been delayed due to uncertainty over land ownership / responsibilities. Investigations are ongoing.

The St James' Wier and Ducks Marsh budget is precautionary, there is no current need to spend but the asset is being monitored.

The landfill gas extraction system works are postponed due to need for wintertime monitoring of boreholes before the works scope can be finalised.

Resourcing issues have reduced capacity to deliver the bridge programme at the anticipated rate, fewer works planned in this financial year.

The budgets for both Oxford Road wall and the Canal Basin Bridge refurbishment are precautionary with no current need to spend at present, but the asset is being monitored.

Scheme	Budget to be Deferred £
Guildhall Shopping Centre Enhancements	4,700,000
Green Space Depot Site	2,500,000
Cathedral Green Display Cases	35,000
St Nicholas Priory Roof	88,120

Officer Responsible: City Surveyor

It is unlikely that there will be any spend on the above programmes until the restructure and recruitment of the Assets team has been progressed.

Commercial Property Ancillary Accommodation	(34,100)
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Officer Responsible: City Surveyor

The budget for the commercial property ancillary accommodation was reprofiled into 2025/26. However, this spend has been incurred this financial year so some of the budget needs to be accelerated into 2024/25.

8.6 FURTHER FUNDING REQUESTS

Disabled Facilities Grant

The Council has been allocated more than had been expected when the current year budget was set. The additional funds total £441,420.

Parks Infrastructure

S106 funding received in respect of Gladstone Road Ambulance Station development. Funds received £62,560.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Capital Programme contributes to all of the key purposes, as set out in the Corporate Plan.

10. What risks are there and how can they be reduced?

10.1 Areas of budgetary risk are highlighted to committee as part of the quarterly budget monitoring updates.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the impact of each scheme is considered prior to approval. Any significant deviation from this will be noted within the body of this report.

12. Carbon Footprint (Environmental) Implications:

12.1 We are working towards the Council's commitment to carbon neutral by 2030. The impact of each scheme is considered prior to approval.

13. Are there any other options?

13.1 There are no other options.

Strategic Director for Corporate Resources, Dave Hodgson

Author: Nicola Morley, Mark Neville-Smith, and Bridget Kendrick

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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2024/25 CAPITAL MONITORING - QUARTER 1

Responsible Officer	Scheme	Total 2024/25 Capital Programme		2024/25 Forecast spend	2024/25 Budget to be Carried Forward to 2025/26 and Beyond	2024/25 Programme Variances (Under)/Over
		2024/25 Spend Quarter 1	2024/25 Forecast spend			
		£	£	£	£	£
Transformation						
Director	Customer Contact Platform	161,030	0	161,030	0	0
	Annual Contribution to Strata	53,910	53,904	53,900	0	(10)
	ECC Civic Centre HFX Door Access Replacement	85,060	0	85,060	0	0
	System Upgrade Cost 2012 Server replacement	3,480	0	0	0	(3,480)
	GIS Cloud Migration	230	0	0	0	(230)
	IT Replacement Programme	10,000	14,228	10,000	0	0
	Idox System for Planning	60,680	0	60,680	0	0
	Financial Management	239,040	16,333	239,040	0	0
	AV Equipment - Hybrid Meeting Rooms	48,800	3,869	48,800	0	0
	PSTN Replacement	29,590	0	40,370	0	10,780
	Microsoft Purview	9,000	0	9,000	0	0
	Microsoft Power Apps	35,930	0	35,930	0	0
	Software Upgrade	28,750	0	28,750	0	0
	Sharegate	5,750	0	5,750	0	0
	Contact Centre Telephony	17,970	0	17,970	0	0
	Core telephony	17,970	0	17,970	0	0
	EUC model staff	14,370	0	14,370	0	0
	EUC model equipment (replacement laptops)	242,310	0	242,310	0	0
	Booking	17,970	0	17,970	0	0
	Sharepoint resource	21,560	0	21,560	0	0
Chatbot	17,970	0	17,970	0	0	
PSTN	10,780	0	0	0	(10,780)	
Print & post review	7,190	0	7,190	0	0	
TOTAL		1,139,340	88,334	1,135,620	0	(3,720)
Net Zero Exeter and City Management						
Service Manager - Public & Green Space	Parks Infrastructure	120,020	0	120,020	0	0
	Cemeteries & Churchyards Infrastructure Improvements	50,000	50	50,000	0	0
	Improved Car Park Security Measures at King William Street & Arena Park	19,670	0	19,670	0	0
	Parks Anti-Intrusion Measures	12,560	267	12,560	0	0
	Ash Die Back Tree Replacement	100,000	9,832	100,000	0	0
	Northbrook Wild Arboretum	272,480	18,620	272,480	0	0
	Play Areas	200,000	18,511	200,000	0	0
	Pinhoe Playing Field Upgrades	42,050	0	42,050	0	0
	Heavitree Paddling Pools	526,680	0	526,680	0	0

Responsible Officer	Scheme	Total 2024/25	Capital Programme		2024/25 Budget to	2024/25 Programme
		£	2024/25 Spend	2024/25 Forecast	be Carried Forward	Variations
			Quarter 1	spend	to 2025/26 and	(Under)/Over
		£	£	£	Beyond	£
Engineering & Assets Manager	Bowling Green Marshes Coastal Defence Scheme	100,000	0	50,000	50,000	0
	Cricklepit Bridge	100,000	4,633	70,000	30,000	0
	Trews Weir refurb	130,000	41,764	130,000	0	0
	District Street Lighting	150,000	0	150,000	0	0
	Exeter Quay Cellars cliff face	282,810	98,296	282,810	0	0
	Farm Hill Retaining Walls (23 no.)	200,000	1,796	50,000	150,000	0
	Mallison Bridge	64,670	0	64,670	0	0
	Bonhay Rd/Andlaw House Footpath	144,810	175	75,000	69,810	0
	St James' Weir & Ducks Marsh Meadow banks	75,000	0	0	75,000	0
	Landfill Gas Extraction Systems	100,000	3,250	53,250	46,750	0
	Mincinglake Valley Park Reed Beds & Pipe Inlet	50,000	0	25,000	25,000	0
	Bromhams Farm Playing Fields	313,840	111,286	299,360	14,480	0
	Longbrook Street wall behind 30-38	5,000	0	0	5,000	0
	ECC Bridge Repair Programme	350,000	4,117	250,000	100,000	0
	Countess Wear Retaining Wall Rebuild	135,120	5,807	135,120	0	0
	Oxford Road Car Park Retaining Wall	200,000	0	0	200,000	0
Canal Basin Bridge Refurbishment	50,000	0	0	50,000	0	
Bank Repairs & Stabilisation to Watercourses	20,000	0	1,000	19,000	0	
Service Manager - Recycling, Waste & Fleet	Waste Infrastructure	411,750	981	411,750	0	0
	Improved recycling containers	123,470	0	123,470	0	0
	Enhance the Materials Reclamations Facility	6,170,870	0	6,170,870	0	0
	Food Waste Collections	857,140	0	857,140	0	0
	Fleet Lease costs	910,290	0	910,290	0	0
Service Manager - Environmental Health & Community Safety	Disabled Facility Grants	997,830	336,223	997,830	0	0
	CCTV improvements	97,110	0	97,110	0	0
	DEFRA Air Quality Grant	13,000	0	13,000	0	0
	Noise Monitoring Equipment	28,760	0	28,760	0	0
Harbour Master	Exeter Canal Bank Repairs	76,890	22,186	76,890	0	0
Service Manager - Net Zero & Business	Riverside & RAMM Decarbonisation Projects	5,170,850	89,628	310,000	0	(4,860,850)
	Shared Prosperity Fund	178,550	0	178,550	0	0
Miscellaneous	Rent for Exmouth Buoy Store / St Thomas Arches	129,010	0	129,010	0	0
	Capitalised Staff Costs	150,000	0	150,000	0	0
TOTAL		19,130,230	767,420.47	13,434,340	835,040	(4,860,850)
City Development						
Director	GF Housing Rents	160,350	31,410	160,350	0	0
TOTAL		160,350	31,410	160,350	0	0

Responsible Officer	Scheme	Total 2024/25 Capital Programme			2024/25 Budget to be Carried Forward to 2025/26 and Beyond	2024/25 Programme Variances (Under)/Over
		2024/25 Spend Quarter 1	2024/25 Forecast spend			
		£	£	£	£	£
Communications, Culture and Leisure Facilities						
Director	Council Signage Improvement	9,850	10,777	10,780	0	930
	Riverside Leisure Centre	29,000	0	29,000	0	0
	Riverside Sports Hall Roof	60,870	0	60,870	0	0
	Leisure Complex - Fit Out	442,670	0	442,670	0	0
	Leisure Complex - Build Project	15,750	5,990	15,750	0	0
	Bus Station Construction	207,710	14,750	207,710	0	0
	Leisure Property enhancements	1,047,440	5,583	1,047,440	0	0
	Rent - Haven Road Storage	36,040	0	36,040	0	0
	Leisure Equipment Replacement Programme	661,660	12,028	661,660	0	0
TOTAL		2,510,990	49,127	2,511,920	0	930
Finance						
City Surveyor	Civic Centre Phase 3 Roof Rep	263,380	242,742	263,380	0	0
	City Wall	85,000	0	85,000	0	0
	Backlog Maintenance	0	7,005	7,010	(7,010)	0
	Cathedral Green Display Cases	35,000	0	0	35,000	0
	Topsham Museum	142,680	0	142,680	0	0
	Commercial Property Ancillary Accommodation flat roof recovering	0	34,070	34,100	(34,100)	0
	RAMM Roof Repair & Insulation	711,170	321,286	711,170	0	0
	Corn Exchange Lift	50,000	0	50,000	0	0
TOTAL		1,287,230	605,103	1,293,340	(6,110)	0
SUB TOTAL PLANNED CAPITAL PROGRAMME		24,228,140	1,541,394	18,535,570	828,930	(4,863,640)
APPROVED COMMITTED SCHEMES WITH EXTERNAL FACTORS THAT IMPACT ON DELIVERY TIMESCALES						
Director	Guildhall Shopping Centre Enhancements	5,000,000	0	300,000	4,700,000	0
City Surveyor	Green Space Depot Site (Belle Isle)	2,500,000	0	0	2,500,000	0
	St Nicholas Priory Roof	88,120	0	0	88,120	0
TOTAL		7,588,120	0	300,000	7,288,120	0
GENERAL FUND SERVICES TOTAL		31,816,260	1,541,394	18,835,570	8,117,050	(4,863,640)

BUDGETS CARRIED FORWARD TO 2025/26 AND BEYOND

Responsible Officer	Scheme	2025/26 Budget as per Budget Book/Council Approvals	Proposed Budget to be Carried Forward to 2025/26 and Beyond at Qtr 1	Proposed Budget Reprofiled to Future Years	Total 2025/26 Capital Programme	2026/27 Budget as per Budget Book/Council Approvals
		£	£	£	£	£
Transformation						
	Annual Contribution to Strata	53,910	0		53,910	53,910
Director	IT Replacement Programme	10,000	0		10,000	10,000
	Datacentre Relocation	35,940	0		35,940	
	NCSC Zero Trust	53,910	0		53,910	
	EUC model equipment (replacement laptops)	150,000	0		150,000	150,000
TOTAL		303,760	0	0	303,760	213,910
Net Zero Exeter and City Management						
	Parks Infrastructure	99,390	0		99,390	
Service Manager - Public & Green Space	Cemeteries & Churchyards Infrastructure Improvements	84,790	0		84,790	
	Ash Die Back Tree Replacement	147,910	0		147,910	
	Play Areas	200,000	0		200,000	166,900
	Outdoor Leisure Facilities - Newcourt	121,270	0		121,270	
	Bowling Green Marshes Coastal Defence Scheme	150,000	50,000		200,000	217,870
	Cricklepit Bridge	53,750	30,000		83,750	
	Trews Weir refurb	300,000	0		300,000	3,099,510
	District Street Lighting	796,140	0		796,140	
	Piazza Terracina		0		0	158,560
	Farm Hill Retaining Walls (23 no.)	646,040	150,000		796,040	
	Riverside Walls at Quay	50,000	0		50,000	
	Bonhay Rd/Andlaw House Footpath		69,810		69,810	
Engineering & Assets Manager	St James' Weir & Ducks Marsh Meadow banks		75,000		75,000	
	Landfill Gas Extraction Systems	159,350	46,750		206,100	
	Mincinglake Valley Park Reed Beds & Pipe Inlet	131,510	25,000		156,510	
	Bromhams Farm Playing Fields		14,480		14,480	
	Longbrook Street wall behind 30-38		5,000		5,000	
	ECC Bridge Repair Programme	200,000	100,000		300,000	200,000
	Oxford Road Car Park Retaining Wall		200,000		200,000	
	Canal Basin Bridge Refurbishment		50,000		50,000	
	Bank Repairs & Stabilisation to Watercourses		19,000		19,000	
Service Manager - Recycling, Waste & Fleet	Enhance the Materials Reclamations Facility	1,675,000	0		1,675,000	
Service Manager - Environmental Health & Community Safety	Disabled Facility Grants	800,000	0		800,000	800,000
Service Manager - Net Zero & Business	Riverside & RAMM Decarbonisation Projects	900,150	0		900,150	
Miscellaneous	Capitalised Staff Costs	150,000	0		150,000	150,000
TOTAL		6,665,300	835,040	0	7,500,340	4,792,840
Communications, Culture and Leisure Facilities						
	Leisure Complex - Build Project	650,000	0		650,000	
Director	Leisure Property enhancements	1,000,000	0		1,000,000	
	Leisure Equipment Replacement Programme	100,000	0		100,000	100,000
	Pinhoe Community Hub	1,276,470	0		1,276,470	

Responsible Officer	Scheme	2025/26 Budget as per Budget Book/Council Approvals	Proposed Budget to be Carried Forward to 2025/26 and Beyond at Qtr 1	Proposed Budget Reprofiled to Future Years	Total 2025/26 Capital Programme	2026/27 Budget as per Budget Book/Council Approvals
		£	£	£	£	£
TOTAL		3,026,470	0	0	3,026,470	100,000
Finance						
	Civic Centre Air Conditioning Replacement	25,000	0		25,000	
	Fire Risk Assessment Works	1,626,810	0		1,626,810	
	Exmouth Buoy Store	212,720	0		212,720	
	Guildhall MSCP	883,400	0		883,400	
	John Lewis MSCP	357,760	0		357,760	
	Princesshay 2 MSCP	424,400	0		424,400	
	Leighton Terra & KW St MSCP	618,000	0		618,000	
	City Wall	477,740	0		477,740	
	Backlog Maintenance	530,030	(7,010)		523,020	
City Surveyor	BLRF - Exeter Canal Basin	591,240	0		591,240	
	BLRF - Mary Arches Car Park	1,289,460	0		1,289,460	
	BLRF - Belle Isle	663,940	0		663,940	
	BLRF - Clifton Hill	225,000	0		225,000	
	BLRF - Lower Wear Road	293,390	0		293,390	
	Cathedral Green Display Cases		35,000		35,000	
	Commercial Property Ancillary Accommodation flat roof recovering	104,540	(34,100)		70,440	
	Wat Tyler House - resolving ongoing water ingress with new rainwater system	272,270	0		272,270	
	Commercial Properties - capital improvements to enable ongoing income (compliance with EPC legislation)	120,000	0		120,000	
TOTAL		8,715,700	(6,110)	0	8,709,590	0
SUB TOTAL PLANNED CAPITAL PROGRAMME		18,711,230	828,930	0	19,540,160	5,106,750
APPROVED COMMITTED SCHEMES WITH EXTERNAL FACTORS THAT IMPACT ON DELIVERY TIMESCALES						
Director	Guildhall Shopping Centre Enhancements	5,884,280	4,700,000		10,584,280	
City Surveyor	Green Space Depot Site (Belle Isle)	375,970	2,500,000		2,875,970	
	St Nicholas Priory Roof		88,120		88,120	
TOTAL		6,260,250	7,288,120	0	13,548,370	0
GENERAL FUND SERVICES TOTAL		24,971,480	8,117,050	0	33,088,530	5,106,750

GENERAL FUND AVAILABLE RESOURCES

GENERAL FUND	2024-25 £	2025-26 £	2026-27 £	FUTURE YEARS £	TOTAL £
CAPITAL RESOURCES AVAILABLE					
Capital Receipts Brought Forward	851				851
GF Capital Receipts	5,198,275	0	0	0	5,198,275
Revenue Contributions to Capital Outlay	198,470	53,756	0	0	252,226
Disabled Facility Grant	997,830	800,000	800,000	800,000	3,397,830
Community Infrastructure Levy	6,987,389	1,716,024	166,904	0	8,870,317
Other - Grants/External Funding/Reserves/S106	2,115,890	3,868,050	767,380	0	6,751,320
Total Resources Available	15,498,705	6,437,830	1,734,284	800,000	24,470,819
GENERAL FUND CAPITAL PROGRAMME					
Capital Programme	31,816,260	24,971,480	5,106,750	1,263,910	63,158,400
Overspends/(Savings)	(4,863,640)				(4,863,640)
Slippage	(8,117,050)	8,117,050			0
Total General Fund	18,835,570	33,088,530	5,106,750	1,263,910	58,294,760
UNCOMMITTED CAPITAL RESOURCES:					
Capital Receipts Brought Forward	851	1,617,928	418,028	104,118	851
Resources in Year	15,497,854	6,437,830	1,734,284	800,000	24,469,968
Less Capital Receipts used to finance past debt	(648,958)	0	0	0	(648,958)
Less Capital Receipts to carry forward	(1,617,928)	(418,028)	(104,118)	0	0
Less Spend in Year	(18,835,570)	(33,088,530)	(5,106,750)	(1,263,910)	(58,294,760)
Borrowing Requirement	5,603,751	25,450,800	3,058,556	359,792	34,472,899

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Strategic Director Corporate Resources

Title: 2024/25 HRA Budget Monitoring Report – Quarter 1

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To advise Members of the financial position of the HRA Revenue and Capital Budgets for the 2024/25 financial year after three months.

1.2 In addition to the budgetary over/under-spends reported to this committee, Appendix 1 also highlights areas of risk, so that Members are aware that certain budgets have been identified as being vulnerable to factors beyond the control of the Council, which may result in potential deviations from budget, and are therefore subject to close monitoring by officers.

2. Recommendations:

2.1 It is recommended the Executive note the report and Council notes and approves (where applicable):

- 1) The HRA forecast financial position for 2024/25 financial year; and
- 2) A request to vire £95k Estate Management approval from the capital programme to an annual revenue budget of circa £24k for four years.

3. Reasons for the recommendation:

3.1 To formally note the HRA's projected financial position and to approve the reported variations to the HRA Capital Programme.

3.2 The Housing Revenue Account is a statutory account and local housing authorities have a duty to keep a HRA in accordance with proper accounting practices and to review the account throughout the year. Members are presented with a quarterly financial update in respect of the HRA and this is the first update for 2024/25.

4. What are the resource implications including non financial resources

4.1 The financial resources required to deliver both housing services to Council tenants and to invest in new and existing housing stock during 2024/25 are set out in the body of this report.

4.2 The impact on the HRA's available financial resources are set out in Appendix 3.

5. Section 151 Officer comments:

5.1 Similar to last year, the repairs and maintenance budget is showing significant signs of pressure. The level of overspend is unsustainable and therefore the section 151 Officer will work with the Head of Service to understand what the issue is and how it can be addressed. If this requires an increase in the budget, this will have to come from extending the capital programme over a number of years in order to reduce the revenue contribution to capital expenditure.

6. What are the legal aspects?

6.1 The statutory requirement for a Housing Revenue Account (HRA) is set out in Part VI of the Local Government and Housing Act 1989. Section 74 of the Act sets out the duty to keep a Housing Revenue Account as a ring-fenced fund and sets out the structure within which the HRA operates. Part VI of the Act sets out the detailed statutory provisions on the operation of the HRA, including credits to the account (income) and debits to the account (expenditure). Section 76 sets out the duty to prevent a debit balance on the HRA. The authority must implement proposals that will secure that the HRA account for each financial year will not show a debit balance. Members will also note the provisions of Schedule 4 of the Act which sets out the requirements concerning 'The Keeping of the Housing Revenue Account'.

7. Monitoring Officer's comments:

7.1 As set out in the introduction to this report, Members will note the budgetary over/under-spends and will particularly note the areas of risk set out at Appendix 1 to this report. Members will be alert to the fact that certain budgets have been identified as potentially resulting in deviations from budget. This report makes it clear that these budgets will be subject to close monitoring by officers. The key issue is that the authority must ensure that the HRA for the financial year does not show a debit balance. Members will note the proposal to transfer funds from the working balance in order to achieve a balanced budget at the end of the financial year. As Members will note from this report, it is anticipated that the transfer from the working balance for 2024/25 will bring the working balance as at 31 March 2025 close to the HRA balance that Members previously resolved to be retained of £4m.

8. Report details:

HRA BUDGET MONITORING – QUARTER 1

8.1 Background to the HRA

The HRA records expenditure and income relating to council dwellings and the provision of services to tenants. Housing authorities have a statutory duty to maintain a HRA

account, which is primarily a landlord account, in order to account to their tenants for income and expenditure on council housing separately from other functions and services of the Council. This includes tenancy management, repairs and maintenance, council house building and council house retrofits.

8.2 Projected transfer from the working balance

	£
Approved Budgeted transfer from the working balance	208,360*
Supplementary budgets – Council approved 16th July 2024	50,000
Revised Budgeted transfer from the working balance	258,360

*2024/25 Approved Budget Represented By	£
85A1 MANAGEMENT	2,114,770
85A11 EDWARDS COURT	(131,410)
85A2 TENANCY SERVICES	1,863,110
85A3 SUNDRY LANDS MAINTENANCE	507,430
85A4 REPAIR & MAINTENANCE PROGRAMME	7,062,000
85A5 REVENUE CONTRIB TO CAPITAL	2,500,000
85A6 CAPITAL CHARGES	3,745,650
85A7 HOUSING ASSETS	2,709,130
85A8 RENTS	(21,633,420)
85B2 INTEREST	1,471,100
85B4 MOVEMENT TO/(FROM) WORKING BALANCE	(208,360)

The HRA has working balances of £5,669,065 as at 31 March 2024. This is higher than the £4 million contingency resolved to be retained.

The revised budget deficit position of £258k for 2024/25 includes a revenue contribution of £2.5 million to capital.

8.3 Revenue Monitoring

The budget variances anticipated at Quarter 1 indicate that £1,288,918 will be taken from the working balance in 2024/25 – See appendix 2. This represents a movement of £1,030,558 compared to the revised budget £258,360 for 2024/25. This includes an additional £23,828 in the Tenancy Services budget subject to approval of the requested virement from the Estate Improvements capital budget. Variances of +/- £30,000 are detailed below:

Budget Heading	Forecast Outturn Budget Variance at Quarter 1 (Under) / Overspend
Repairs and Maintenance Programme	£1,187,000
<p>Officer Responsible: Head of Asset Maintenance</p> <ul style="list-style-type: none"> • General Maintenance £700k – the response budget continues to experience high demand with the projected overspend being in part due to an increase in stock condition surveys highlighting issues which need to be addressed. The service is also experiencing larger numbers of tenants transferring from/to properties which have had major repairs refused previously and this necessitates increased investment and corresponding repairs. Additionally, the service is receiving requests for more expensive works, including roofing and window repairs which whilst extensive, do not qualify as capital investment so the costs for such fall to this budget area. • Damp and Mould £300k – a separate budget of £100k has been set aside for damp and mould monitoring and works. Whilst in the past 2 years this has been sufficient to cope with required interventions, we are experiencing increased demand as a result of intensive pro-active surveying (from all staff or contractors visiting properties). Consequently, the budget has already been fully spent in Quarter 1 this year. It is anticipated that measures taken to date should help address existing issues experienced by tenants, however problems can recur and the winter months are likely to see higher pressures. • Service contracts £187k – following changes in compliance legislation, there is pressure on the fire risk assessment and fire door inspection and maintenance contracts due to increased testing requirements and frequencies, and the start of a new contract which had been previously delayed. A separate budget for radon testing has been created and funded from managed savings in other contract areas. 	
Interest	(£175,800)
<p>Officers Responsible: Heads of Service – Housing & Asset Maintenance</p> <ul style="list-style-type: none"> • The budget includes interest cost for additional £3.9m approved borrowing. To date this has been funded internally and no external borrowing has been arranged, resulting in a saving in interest and repayment costs in the year. 	
Total budget (underspend)/overspend	£1,030,558
2024/25 HRA Deficit / (Surplus)	£1,288,918

8.4 Impact on HRA Working Balance

The HRA Working Balance represents amounts set aside to help facilitate service improvements, repay debt or to provide investment in the stock in future financial years.

The forecast balance, as at 31 March 2025, is set out below:

Movement	2024/25
Opening HRA Working Balance, as at 1 April 2024	£5,669,065
Forecast transfer (from) / to the working balance for 2024/25	(£1,288,918)
Balance resolved to be retained (HRA contingency)	(£4,000,000)
Forecast Balance Available, as at 31 March 2025	£380,147

The transfer from the working balance anticipated for 2024/25 brings the working balance as at 31 March 2025 close to the HRA balance resolved to be retained of £4m.

8.5 HRA Available Resources over the Medium Term

The forecast HRA available resources for delivering both housing services and capital investment are set out in Appendix 3 for the period to 2027/28.

The total available resources is made up of several reserve balances; the HRA working balance, the Useable Capital Receipts reserve, and the Major Repairs Reserve.

The HRA working balance is the movement on revenue budgets, contributions can be made from this reserve towards financing capital budgets in the form of 'Revenue Contributions to Capital'. The useable capital receipts reserve is made up of both the Right-to-Buy (RTB) receipts reserve and the Non-RTB receipts reserve; these reserves are available to finance capital spend; some restrictions apply. The Major Repairs Reserve is increased each year by the HRA depreciation charge to revenue, this reserve is then available to spend on the HRA capital programme.

The total forecast HRA available resources is impacted by variances in both revenue budgets detailed in section 8.3 above and variances in capital budgets detailed in section 8.7 below.

The forecast total available resources over the Medium-Term Financial Plan (MTFP) has reduced by £1,391,020 since last reported at 2023/24 Outturn stage. This is primarily due to projected overspends of nearly £1.2m within Repairs and Maintenance, as outlined above.

Total available reserves over the MTFP are now expected to be £2,772,166 after deducting the £4 million balance resolved to be retained (HRA contingency).

8.6 HRA Debt

In October 2018 the Government formally removed the HRA debt cap, which restricted the amount of borrowing stock-holding local authorities could have for the purposes of the HRA. The lifting of the 'debt cap' means that local authorities are now able to borrow for housebuilding in accordance with the Prudential Code.

Executive on 8 October 2019 approved the first Council House Building Programme to deliver 100 new homes into the HRA at a cost of £18 million. On 5 April 2020, the Council took out a loan of £15.36 million from the PWLB to support this programme, with the remaining £2.64 million to be funded by capital receipts.

As at 31 March 2024, the HRA's borrowing stood at £73.242 million. The total of the £15.360 million new loan and the former 'debt cap' level of £57.882 million. The HRA currently has approval to borrow a further £6.6 million, this has been deferred but will likely be required in the next 12 to 24 months.

8.7 HRA Capital Programme

The 2024/25 HRA Capital Programme was approved by Council on 6th February 2024. Since that meeting the following changes have been made that have increased the 2024/25 programme.

Description	2024/25	Approval / Funding
HRA Capital Programme	£17,962,112	
Budgets carried forward from 2023/24 HRA Capital Programme	£1,252,590 £5,415,189	Executive – 9 th April 2024 (Q3) Executive – 9 th July 2024 (Q4)
Additional approval for Hamlin Gardens	£74,000	Executive – 9 th July 2024
Revised HRA Capital Programme	£24,703,891	

The current approved HRA Capital Programme is detailed in Appendix 4. Please note that the individual capital budgets have been updated to reflect 22/23 carry forwards which were incorrectly applied to three schemes, but there is no net impact on the overall programme.

The appendix shows a total forecast spend in 24/25 of £23,219,646. The details of key (greater than +/- £50k) variances from budget are set out below.

Scheme	Overspend / (Underspend)
Estate Improvements	(£95,312)
<p>Officer Responsible: Head of Housing</p> <p>This budget was intended for works to improvements of estates but has proved challenging to use for capital works, with more priority on revenue related activity so it is recommended that it is vired and £24k added to the revenue budget each year for the remainder of the medium-term financial plan to give more flexibility.</p>	
Local Authority Housing Fund	(£77,117)
<p>Officer Responsible: Head of Housing</p> <p>There is an underspend on the budget for the purchase and refurbishment of 13 new homes for households who came to the UK from Ukraine and Afghanistan.</p>	
Laings	£57,374
<p>Officer Responsible: Head of Asset Maintenance</p> <p>A total of £2.5m has been approved to deliver the final phase of the Laings project. This has not yet been fully included in the capital budget as the financing has not yet been agreed and a separate paper is being prepared for Members. However additional approval is required in 24/25 to fund the purchase of the final Laings property which was privately owned.</p>	

Schemes identified as being wholly or partly deferred to 2025/26 and beyond are:

Scheme	Budget deferred to/(brought forward from) future years
Common Area Footpath & Wall improvements	£169,190
<p>Officer Responsible: Head of Asset Maintenance</p> <p>Due to capacity issues the full budget will not be spent in 24/25, however the work is still required and will be undertaken in 25/26.</p>	
Vaughan Road – Phase A	£1,200,000
<p>Officer Responsible: Head of Asset Maintenance</p> <p>The scheduled completion for Phase A is June 2025, so £1.2m of the approval will be required in 25/26.</p>	

Historic Council own build Final Accounts to 31 March 2025

The Council's own build properties at Rowan House and Knights Place form part of the overall Housing Revenue Account, but separate income and expenditure budgets are maintained in order to ensure that they are self-financing.

As the 21 units were built using HCA funding in conjunction with borrowing (£998k), they are accounted for separately in order to ensure that they are self-financing. A separate COB working balance and Major Repairs Reserve are maintained until such time as a sufficient balance has been accumulated to repay the debt attributable to these properties, at which point the units can be accounted for with the wider HRA stock.

Key Variances from Budget

The capital charges will be £330 lower than budgeted, reducing the projected transfer from working balance to £15,800 during 2024/25.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Housing Revenue Account contributes to a key purpose, as set out in the Corporate Plan; Building great neighbourhoods.

10. What risks are there and how can they be reduced?

10.1 For clarity, these are specific financial risks, alongside the risks captured in the corporate risk register.

10.2 It is not permissible for the HRA to go into an overall financial deficit position, it is therefore important to ensure that an adequate level of HRA balances is maintained as a contingency against risks. The HRA resolve to retain a working balance at no less than £4 million to mitigate against financial risks.

10.3 Areas of budgetary risk are highlighted to committee as part of the quarterly budget monitoring updates.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex

and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because there are no significant equality and diversity impacts associated with this decision.

12. Carbon Footprint (Environmental) Implications:

12.1 We are working towards the Council's commitment to carbon neutral by 2030. The impact of each scheme is considered prior to approval.

13. Are there any other options?

13.1 None.

Strategic Director Corporate Resources, David Hodgson

Author: Claire Hodgson

Local Government (Access to Information) Act 1972 (as amended)




Background papers used in compiling this report:-

None




Contact for enquires:
Democratic Services (Committees)
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A number of areas of budgetary risk have been identified within the HRA, as follows:

Budget Title	2024/25 Approved Budget	Risk Rating	Risk and mitigation
General Maintenance	£2,545,320 (revenue)		<p>The volatility of the level of requested repairs due to factors beyond the control of the Council, for example adverse weather conditions, represents a budgetary risk. The impact of property inspections undertaken by the Tenancy Services Team may also lead to the identification of additional repairs. This budget includes spend on damp and mould. Spend to month three is ahead of profile and will be closely monitored for the rest of the year, however at this point a £1m overspend is projected.</p> <p>Mitigation measures include contract meetings with the Contractor which include budget review and work in progress updates. Other supporting measures include weekly Surveyors meetings to highlight repair demand pressures.</p>
Repairs to Void Properties	£1,346,000 (revenue)		<p>Property turnover and the varying condition of properties when returned to the Council represent a budgetary risk. As at Quarter 1 spend is broadly in line with the budget.</p> <p>Mitigation includes property inspections by Housing Officers which highlight sub-standard property conditions wherever possible and are an early alert to issues.</p>
Rental Income from Dwellings	(£21,633,420) (revenue)		<p>Right to Buy sales, number of new tenancies set at convergence rent levels, number of days lost through major works, rent lost in respect of void properties and the decant of Rennes House all impact on the annual rental income.</p> <p>Rental income after the first 3 months is largely in line with profile.</p>

Risk Rating:

	Potential for a favourable variance compared to the budget or no variance at all
	Potential for adverse budgetary variance of between 0% and 5% that will be kept under review
	Potential for an adverse budgetary variance of more than 5% and will be monitored closely

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HOUSING REVENUE ACCOUNTS BUDGET MONITORING 2024-25

APPENDIX 2

QUARTER 1

ACTUAL TO DATE			YEAR END FORECAST			
PROFILED BUDGET	ACTUAL TO DATE	VARIANCE TO DATE	MANAGEMENT UNIT	APPROVED BUDGET	Q1 FORECAST VARIANCE	CURRENT OUTTURN FORECAST
£	£	£		£	£	£
382,313	434,688	52,375	MANAGEMENT	2,114,770	0	2,114,770
(43,465)	(142,670)	(99,205)	EDWARDS COURT	(131,410)	10,000	(121,410)
465,275	391,501	(73,774)	TENANCY SERVICES	1,863,110	30,328	1,893,438
153,545	47,084	(106,461)	SUNDRY LAND MAINTENANCE	507,430	0	507,430
1,896,920	1,812,826	(84,094)	REPAIRS & MAINTENANCE PROGRAMME	7,112,000	1,187,000	8,299,000
84,375	38,341	(46,034)	RE-POINTING	337,500	0	337,500
150,308	120,857	(29,451)	ASBESTOS	651,230	0	651,230
742,000	997,425	255,425	GENERAL MAINTENANCE	2,545,320	1,000,000	3,545,320
336,500	277,507	(58,993)	REPAIRS TO VOID PROPERTIES	1,346,000	0	1,346,000
18,617	13,307	(5,310)	ELECTRICAL TESTING / REACTIVE	74,470	0	74,470
345,360	228,178	(117,182)	SERVICE CONTRACTS	1,278,440	187,000	1,465,440
203,510	96,059	(107,451)	LOW MAINTENANCE & PAINTING FLATS	814,040	0	814,040
16,250	41,152	24,902	INTERNAL DECORATION PROGRAMME	65,000	0	65,000
0	0	0	REVENUE CONTRIBUTION TO CAPITAL	2,500,000	0	2,500,000
0	0	0	CAPITAL CHARGES	3,745,650	(20,970)	3,724,680
584,658	560,540	(24,118)	HOUSING ASSETS	2,709,130	0	2,709,130
(5,408,355)	(5,344,767)	63,588	RENTS	(21,633,420)	0	(21,633,420)
367,775	272,598	(95,178)	INTEREST	1,471,100	(175,800)	1,295,300
			MOVEMENT TO/(FROM) WORKING BALANCE	(258,360)	(1,030,558)	(1,288,918)
			Net Expenditure	0	0	0
			Working Balance 1 April 2024	5,669,065	31 March 2025	4,380,147

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COUNCIL OWN BUILD SITES

PROFILED BUDGET	ACTUAL TO DATE	VARIANCE TO DATE	MANAGEMENT UNIT	APPROVED BUDGET	Q1 FORECAST VARIANCE	CURRENT OUTTURN FORECAST
£	£	£		£	£	£
24,520	17,370	(7,150)	MANAGEMENT	98,080	0	98,080
(3,300)	(4,187)	(887)	ROWAN HOUSE	(13,200)	0	(13,200)
(19,675)	(22,762)	(3,087)	KNIGHTS PLACE	(78,700)	0	(78,700)
0	0	0	INTEREST	(7,510)	0	(7,510)
0	0	0	CAPITAL CHARGES	17,460	(330)	17,130
			MOVEMENT TO/(FROM) WORKING BALANCE	(16,130)	330	(15,800)
			Net Expenditure	0	0	0
			Working Balance 1 April 2024	312,318	31 March 2025	296,518

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HRA AVAILABLE RESOURCES

HOUSING REVENUE ACCOUNT	2024-25 £	2025-26 £	2026-27 £	2027-28 £	TOTAL £
CAPITAL RESOURCES AVAILABLE					
Usable Receipts Brought Forward					7,745,744
Major Repairs Reserve Brought Forward					12,455,749
Other HRA Sales	210,000	500,000	500,000	250,000	1,460,000
RTB sales	405,708	875,000	875,000	875,000	3,030,708
Surrender back to DLUHC - pending investment in replacement affordable housing				0	
Major Repairs Reserve	3,724,680	3,745,650	3,745,650	3,745,650	14,961,630
Revenue Contributions to Capital	2,500,000	3,175,000	2,925,000	3,200,000	11,800,000
Local Authority Housing Fund grant		-	-		0
Local Authority Housing Fund s106	18,803				18,803
Social Housing Decarbonisation Fund	833,102				833,102
Commuted sums	0				0
Borrowing	0	3,900,000	2,748,380		6,648,380
Total Resources available	7,692,293	12,195,650	10,794,030	8,070,650	58,954,116
CAPITAL PROGRAMME					
HRA Capital Programme	24,703,891	10,758,111	10,767,358	10,087,896	56,317,256
Q1 - Slippage / Re-profiling	- 1,369,190	1,369,190	0	0	0
Q1 - Overspends / (Savings)	-115,055				-115,055
Total Housing Revenue Account	23,219,646	12,127,301	10,767,358	10,087,896	56,202,201
UNCOMMITTED CAPITAL RESOURCES:					
Usable Receipts Brought Forward	7,745,744	1,644,311	1,444,311	1,694,311	7,745,744
Major Repairs Reserve Brought Forward	12,455,749	3,029,829	3,298,178	3,074,850	12,455,749
Resources in Year	7,692,293	12,195,650	10,794,030	8,070,650	38,752,623
Less Estimated Spend	(23,219,646)	(12,127,301)	(10,767,358)	(10,087,896)	(56,202,201)
Uncommitted Capital Resources	4,674,140	4,742,489	4,769,161	2,751,915	2,751,915
WORKING BALANCE RESOURCES:					
Balance Brought Forward	5,669,066	4,380,148	3,998,579	3,983,628	5,669,066
HRA Balance Transfer - to/(from) Working Balance	(258,360)	(381,569)	(14,951)	36,623	(618,257)
Q1 forecast under/(over)spend 2024-25	(1,030,558)				-1,030,558
Balance Carried Forward	4,380,148	3,998,579	3,983,628	4,020,251	4,020,251
Balance Resolved to be Retained	(4,000,000)	(4,000,000)	(4,000,000)	(4,000,000)	(4,000,000)
Uncommitted HRA Working Balance (after balance resolved to be retained of £4m)	380,148	-1,421	-16,372	20,251	20,251
TOTAL AVAILABLE CAPITAL RESOURCES (after balance resolved to be retained of £4m)	5,054,288	4,741,068	4,752,789	2,772,166	2,772,166

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**2024-25
CAPITAL MONITORING - QUARTER 1**

	2024-25 Capital Programme	2024-25 Spend	2024-25 Forecast Spend	2024-25 Budget to be Carried Forward to Future Years	TO 2025-26	TO 2026-27	TO 2027-28	2024-25 Programme Variances Under ()
	£	£	£	£	£	£	£	£
HRA CAPITAL								
<i>EVERYONE HAS A HOME</i>								
Adaptations	965,164	132,959	965,164					-
Balcony Walkway Improvements	670,986	29,151	670,986					-
Bathroom Replacements (inc. Communal)	1,000,000	113,481	1,000,000					-
Boiler Replacement Programme & Central Heating	1,016,723	161,761	1,016,723					-
Common Area Footpath & Wall Improvements	367,190	50,656	198,000	(169,190)	169,190			-
Communal Area Improvements - New Flooring	50,000	34,149	50,000					-
Communal Door and Screen Replacements	100,000	0	100,000					-
Door Replacements (inc. Outbuildings)	416,000	53,853	416,000					-
Electrical Central Heating	10,000	3,444	10,000					-
Electrical Rewires - Communal	166,140		166,140					-
Electrical Rewires - Domestic	666,360	100,213	666,360					-
Energy Conservation	2,479,580	670,965	2,479,580					-
Estate Improvements	95,312	0	0				-	95,312
Fire Risk Assessment Works - Compliance	802,706	0	802,706					-
Fire Risk Assessment Works - Planned	333,340	0	333,340					-
Fire Safety Storage Facilities	109,462	0	109,462					-
Kitchen Replacements (inc. Communal)	1,659,762	261,969	1,659,762					-
LAINGS Refurbishments	242,626	21,248	300,000					57,374
Lift Upgrades	237,400	0	237,400					-
Reroofing - Flats	122,000	93,399	122,000					-
Reroofing - Houses (outbuildings, chimney, gutters, downpipes, fascia)	1,505,774	79,660	1,505,774					-
Porch Canopies	103,924	0	103,924					-
Rennes House	483,045	3,221	483,045					-
Soil Vent Pipe Replacement	18,487	0	18,487					-
Structural Repairs	671,045	321,536	671,045					-
Window Replacements	913,393	118,979	913,393					-
Plastering	75,000	21,672	75,000					-
HOUSING REVENUE ACCOUNT TOTAL	15,281,419	2,272,316	15,074,291	(169,190)	169,190	0	0	(37,938)
COUNCIL OWN BUILD CAPITAL								
Social Housing Acquisitions - Open Market	466,323	350,000	466,323					-
St Loyes Extracare Scheme	19,739	0	19,739					-
Local Authority Housing Fund	95,920	18,803	18,803				-	77,117
Council House Building Programme - Bovemoors Lane	32,345	5,000	32,345					-
Council House Building Programme - Hamlin Gardens	1,294,248	611,720	1,294,248					-
Council House Building Programme - Vaughan Road Phase A	6,043,482	1,563,418	4,843,482	(1,200,000)	1,200,000			-
Council House Building Programme - Vaughan Road Phases B and C	1,470,415		1,470,415					-
COUNCIL OWN BUILD TOTAL	9,422,472	2,548,941	8,145,355	(1,200,000)	1,200,000	0	0	(77,117)
OVERALL HOUSING REVENUE ACCOUNT TOTAL	24,703,891	4,821,257	23,219,646	(1,369,190)	1,369,190	0	0	(115,055)

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REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

Report of: Strategic Director of Corporate Resources

Title: Approved Projects Options Report

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 Over the past two years, Council has approved the funding for two HRA development schemes, but given the unviability of both schemes, delegated Authority to the section 151 Officer to proceed at a point when the funding of the schemes becomes viable.

1.2 The Laings scheme is a small but complex project, with 12 of the 19 properties completed and occupied. 7 properties remain to be completed. The way forward for the project was agreed at committee on 18 July 2023, but the funding recommendation was delegated to Director Finance (Section 151 Officer), Director City Development in consultation with Portfolio Holder for Council Housing and Support Services and the Leader of the Council. This is because the Council was unable to borrow prudentially at that time and there was no capital available to complete the scheme.

1.3 Council also approved the funding for Vaughan Road phases B and C with the same delegation, for the same reasons. The funding that is now available could equally be used to deliver Phase B of the Vaughan Road scheme.

1.4 As there are two approved schemes, which can be viably delivered, the report seeks Member direction as to which scheme is prioritised.

2. Recommendations:

2.1 That Executive determines which project to fund from the following two options:

- The funding of the project to complete and deliver the remaining 7 properties outstanding in relation to the Laings scheme; or
- The funding of the project to complete and deliver 16 properties at Vaughan Road Phase B.

3. Reasons for the recommendation:

3.1 The Council is committed to delivering new Council Housing for the HRA and these sites represent an opportunity for delivery following the successful completion of Edward's Court, Bovemoors Lane, Ernest Johns Mews and the commencement on site of the new apartment blocks at Hamlin Gardens and Vaughan Road.

3.2 Due to changes in the economy and in the construction sector the viability of brownfield development has become very challenging, and the Council need to ensure that best use of the capital available is made.

3.3 Both schemes in this report would benefit from the funding to ensure that the delivery of affordable housing into the Council's HRA continues, but there are only the resources available to proceed with one of them currently, so a decision is required on which one should be progressed.

4. What are the resource implications including non financial resources

4.1 The overall cost to the HRA for the delivery of the 2 construction options will be £2.5m (Laings) or £4.62m (Vaughan Road Phase B). Both options would utilise £1.4m of the available £1.7m capital receipts. The remaining requirement will be made up of borrowing and where required Homes England grant funding.

4.2 The HRA will seek to limit the borrowing on both construction options with a combination of HRA capital and Homes England grant as appropriate. The modelling currently shows a modest £60,000 per unit from Homes England, but this amount can be modified following more detailed engagement with Homes England.

4.3 The Housing Assets Development Team will manage the projects utilising the currently appointed Project Management, Contract Administration and Cost Consultancy team. No additional staff resources would be required.

5. Section 151 Officer comments:

5.1 This report has arisen out of two schemes being approved, without either scheme being viable. Whichever scheme is approved, Officers will work to bring forward the other scheme as soon as suitable funding allows the scheme to proceed.

6. What are the legal aspects?

6.1 The HRA presently only has the financial resources to fund one of the two projects set out in this report. The Executive is tasked with determining this. Given the limited funds available, Members need to consider which scheme to fund taking into account the issues set out in this report.

6.2 Members will note the total costs of the two proposed schemes set out at paragraph 4 of this report. Paragraph 8 of this report sets out the financial aspects in relation to funding of the projects in terms of the HRA's continuation to the cost, the available funding from Homes England in terms of available grants and the requirements for additional borrowing required by the HRA in order to fund each project.

6.3 Members will note, amongst other issues, the current condition of the partially completed Laings project. Members will also note the additional costs consequences in relation to the Vaughan Road project through the developers being taken off site, and the requirement for a new procurement process at some point in the future in the event that Phase B does not proceed.

7. Monitoring Officer's comments:

7.1 Members will note the choice they are presented with to fund one of two projects on the basis that the HRA only has sufficient financial resources to fund one project. The matters for Members to consider are set out in this report.

8. Report details:

8.1 Background

8.1.1 The Council holds a stock of approximately 4,800 residential properties within the Housing Revenue Account. This number reduces by about 40 per year, as stock is sold through the Right to Buy.

8.1.2 The Council has historically had a modest new build programme only completing 67 new homes in the decade to 2019. This has recently accelerated with 75 new builds completed in the last 4 years with 56 homes currently being built at Hamlin Gardens and Vaughan Road and planning for a further 62.

8.1.3 The Housing Revenue Account borrowing cap was lifted in October 2018, allowing Councils to borrow prudentially through their HRA to facilitate new development opportunities.

8.1.4 In the Spring Budget the Government announced changes relating to the retention of the Right to Buy (RTB) receipts, which means that receipts retained since 2019-20 could be used as a 50% contribution towards qualifying scheme costs, rather than the former 40%. The Council had previously match funded scheme costs by 60% since 2019-20 and the reduction to 50% now means that HRA capital resources of £1.7m have become re-available, as RTB receipts previously at risk of being repaid to central Government can now be kept instead. The intention is that £300,000 of this capital will be held back to allow the HRA to build a capital pot to fund future development.

8.1.5 This report looks at the use of this capital to fund the remainder of the Laings project, and also looks at an alternative option to fund the second phase of the Vaughan Road scheme.

8.2 Current Position – Laings Project

8.2.1 This scheme originally consisted of 18 non-traditional Laings Easi-Form properties (concrete panel construction, designed for speed of construction rather than longevity), which, for the most part, form one half of a pair of semi-detached properties. The project is two thirds completed but has suffered from delays with the previous contractor, relating to Covid shutdown of their business, eventual termination of their contract, and the need for an alternative contractor to be brought in to finish some partially completed properties. There are still 6 properties to be completed. The HRA has purchased a further privately owned Laings property, this property is the other half of one of the Council owned properties, so this purchase would aid in the rebuilding of the Council owned property and brings the number of remaining properties to 7.

8.2.2 The Laings project received a budget allocation at committee on 20 February 2018 for £3.25m, at that time this was thought to be adequate to develop all the properties. But the scheme has suffered several setbacks and changes since this original allocation;

including the addition of another property; Lockdown contractor shutdowns and slow progress; issues with the original contractor resulting in the Council bringing in a replacement contractor; significant changes in material and labour costs resulting in large cost uplifts.

8.2.3 To date 12 of the 19 properties have been completed on this project, these properties are signed off and have tenants living in them.

8.2.4 There are 7 properties that are still to be completed for this project, 2 remain undemolished, two are a self-contained pair of semi-detached houses, and the final three have been demolished and the remaining half of the semi is weather protected and propped with scaffolding.

8.2.5 All plots and properties have had the vegetation cut back and rubbish and redundant building materials cleared to improve the appearance of the area and help with any potential neighbour issues or complaints about the sites.

8.2.6 three properties are directly affected by having a demolished adjoining property – One is the void, recently purchased Council owned property, the second is a void SNG HA owned property, the third is an occupied privately owned property.

8.2.7 A budget totalling £2.5m (cost plan mid-2023) is required to deliver the final phase of the Laings project. This budget includes the purchase, demolition, and rebuilding of one privately owned property. The purchase of this property completed in July 2024.

8.2.8 There are ongoing security, scaffolding and fencing costs for this scheme at approximately £3,300 per month.

8.2.9 There are currently 2 families decanted from the remaining properties that wish to return to their original address once the project is completed.

8.2.10 The project now contains two pairs of semi-detached properties which presents some opportunities and versatility over what could be built on these plots.

8.3 Current Position – Vaughan Road Project

8.3.1 Classic Builders started construction in April 2023 and are making good progress with Phase A of the scheme which is due for completion in June 2025.

8.3.2 Additional car park works, the groundworks and foundations for phases B and C and building warranties have all been instructed (totalling circa £2.75m) following consultation with the Leader, Portfolio Holder, Housing Director, and Finance Director. These additional works were agreed as they offered programme advantages and continuity to the overall scheme.

8.3.3 Working with the Council project management team Classic Builders have produced updated costs which separate out phases B and C. The cost to build out the smaller phase B, made up of 16 one- and two-bedroom apartments is £4.4m, plus fees and contingency of £220,000 gives an overall cost of £4.62m.

8.3.4 The remaining phase C would cost £12.2m to construct (£12.81m including fees and contingency) and will deliver 40 one- and two-bedroom apartments.

8.3.5 Phase A of this project was agreed at committee in February 2023 with an allocation of £13m. Phases B & C were approved at committee in July 2023 with an allocation of £22m but the funding recommendation was delegated to Director Finance (Section 151 Officer), Director City Development in consultation with Portfolio Holder for Council Housing and Support Services and the Leader of the Council. This is because the Council was unable to borrow prudentially at that time and there was no capital available to complete the scheme.

8.3.6 Classic Builders are currently in contract for Phase A (and the groundworks as described above for B & C) only. Phase A is due for completion in June 2025, at which point, if not instructed for phases B and/or C, the Classic Builders contract will finish and they will pull off site. At this point, the Council will need to retender for phases B and C of the scheme which is likely to result in higher overall build costs and any advantages of overlapping with phase A will be lost. The elongation of the overall contract costs the Council approximately £11,500 per week – these being the costs for Classic Builders to run the site.

8.3.7 If further phases of the overall scheme are not instructed prior to Classic Builders completing the first phase the remainder of the site will need to be fenced off and mothballed.

8.4 Viability and Funding - Laings

8.4.1 Modelling has been carried out to look at the funding and repayment for the Laings project. The inputs and outputs of the modelling is as follows.

8.4.2 inputs as follows:

- 7 x 3 bed houses;
- Scheme cost £2.5m;
- HRA capital £1.4m;
- HRA Borrowing £1.1m;
- Interest rate at 4.78%

8.4.3 Outputs as follows:

- The scheme is viable;
- Annual deficit becomes a surplus in year 17;
- Loan repaid in year 48.

8.5 Laings Project Alternative

8.5.1 There is an option to look at stock and plot disposal as an alternative to the Council redeveloping the Laings properties. Early discussions have taken place with both SNG (formerly Sovereign HA) and a local building contractor.

8.5.2 The discussions with SNG have focussed on a possible joint disposal of stock in the area. SNG have some adjoining and adjacent housing stock which they are exploring options for, and a small developer may be interested in purchasing the plots and rebuilding and/or refurbishing them for market sale.

8.5.3 The local building contractor may be interested in acquiring some or all the remaining properties to develop and sell as a speculative development. There may be an opportunity to reserve some properties as affordable housing and bring back into the HRA. These discussions are at an early stage and will require all the usual due diligence, procurement, and market testing.

8.5.4 This approach could be more nuanced and could look at disposal of the more commercially attractive plots and then retaining those that could be harder to sell and redevelop those as HRA housing.

8.5.5 This approach would fit with the strategic asset management of the HRA stock and provide the HRA a modest income from the sale proceeds that could be used to fund other projects

8.6 Viability and Funding – Vaughan Road

8.6.1 Modelling has been undertaken for phase B of the Vaughan Road scheme using the same general inputs as on the Laings project above. The inputs and outputs of the modelling is as follows.

8.6.2 Inputs:

- 6 x 1 bed apartments and 10 x 2 bed apartments;
- Build cost £4.4m + 5% for fees and contingency = £4.62m;
- HRA capital £1.4m;
- Homes England grant at a modest £60k per plot = £960k;
- HRA Borrowing £2.26m
- Interest rate 4.78%

8.6.3 Outputs for the model:

- The scheme is viable;
- Annual deficit becomes a surplus in year 11;
- Loan repaid in year 42

8.7 Other Considerations

8.7.1 The options are considered in this report.

8.8 The Proposed Way Forward

8.8.1 Agreement is required for the which option is preferred.

8.8.2 The Strategic Director for Corporate Resources (s151 Officer) will continue to work with the Housing Assets Development Team to finalise the tenure for the scheme and define the most advantageous combination of funding to successfully deliver the preferred scheme.

8.8.3 Further engagement will be undertaken with Homes England to facilitate the submission of a bid for grant funding for phase B of the Vaughan Road scheme if that option is chosen.

8.8.4 If it is agreed to proceed with the use of the available capital for the Laings project, the following work will need to be undertaken before any construction will commence on site:

- Undertake the required design work for the new property and submit a Planning application.
- Appoint and/or tender for the required consultants for the project – designers, project managers, cost consultants, contract administrators, structural and civil engineers.
- Finalise the tender pack (mostly complete) and go out to tender for a main contractor to complete the project.
- Review submissions, score, and interview.
- Ensure costs are affordable and appoint contractor.
- Mobilise and start on site.

8.8.5 If it is agreed to proceed with phase B of the Vaughan Road project, the following work will be required before the scheme can commence.

- Finalise the costs and funding;
- Submit bid to Homes England for grant funding; and
- Instruct Classic to commence the works.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The proposals in this report are consistent with the corporate objective of delivering high quality, value for money homes as part of Liveable Exeter. The corporate priorities also support building great neighbourhoods and that residents have a home that is secure, healthy, and affordable. It also contributes to the council being well run with good management of our assets.

10. What risks are there and how can they be reduced?

10.1 There is the potential for cost and time overruns with construction contracts, but we seek to mitigate these by having a more detailed design at tender stage and competitively tendering. The contract administration will be closely controlled to allow for the mitigation of risks and any potential design changes. The chosen form of contract will also help to mitigate this risk.

10.2 Delaying the start on site of phase B of the Vaughan Road project would likely lead to a further increase in the build cost due to tender price inflation and the lack of continuity across the 3 phases. The risk of this will be mitigated by entering into contract and allowing for the continuity of contractor and sub-contractors across the scheme.

10.3 There is potential that Homes England might reject our grant bids for the future phase of the overall scheme, but the development team have been engaging with and meeting with Homes England for many months now and they have been fully briefed on the HRA programme and market intelligence and Homes England feedback suggests that grant levels meet the Homes England parameters based on percentage of scheme costs.

10.4 Delaying the completion of the Laings project leaves these plots looking unsightly in the estate, and further delays would likely result in an increase in the overall cost of the scheme. These risks can be mitigated by either completing the project, or by looking to dispose of the plots on the open market.

11. Equality Act 2010 (The Act)

11.1 A focus on the quality of our properties and service delivery is likely to have a beneficial impact on Council tenants, a number of whom have protected characteristics or are vulnerable in the long term.

11.2 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act and an Equalities Impact Assessment has been included in the background papers for Member's attention.

12. Carbon Footprint (Environmental) Implications:

12.1 The recommendations made in the report will help to deliver the Council's carbon reduction target (carbon neutral by 2030).

12.2 The HRA Development Programme is focussed on the environmental aspects of construction, building to the PassivHaus standard and Building Biology principles. Existing properties are being assessed in terms of their respective energy performance and investment decisions are formulated to deliver the required improvements.

13. Are there any other options?

13.1 The options have been discussed in the body of the report.

Strategic Director of Corporate Resources, Dave Hodgson

Author: Gary Stenning

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275

Equality Impact Assessment: Laings Project Options Report

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive Committee 01/10/2024	Approved Projects Options Report	That Executive: Notes the content of this report and the options available to the Housing Revenue Account.	Staff and Housing Customers

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		Determines the preferred option of the Executive Committee from the following: <ul style="list-style-type: none"> • Deliver 7 homes to replace the former Laings properties; • Deliver 16 properties at Vaughan Road Phase B. 	

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral		
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term	Positive		The proposals, if approved, will enable the development of a number of new homes with greater design benefits for those with mobility issues.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
adverse impact on their ability to carry out normal day-to-day activities.			
Sex/Gender	Neutral		
Gender reassignment	Neutral		
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral		
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral		
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive		The proposal, if approved, will enable the development of accommodation with greater design benefits. A focus on the quality of our properties and service delivery is likely to have a beneficial impact on Council tenants, a number of whom have protected characteristics or are vulnerable in the long term. Additionally, the building design proposals will mean that it will be far easier and cheaper to keep warm which will disproportionately benefit older or physically vulnerable people who spend longer indoors than others.
Pregnancy and maternity including new and breast feeding mothers	Neutral		
Marriage and civil partnership status	Neutral		

Actions identified that will mitigate any negative impacts and/or promote inclusion

The Report proposals contribute to the Council's objectives of providing high quality, value for money services and by being embedded in a well-run Council which aspires to build great neighbourhoods.

Officer: Gary Stenning

Date: 19/08/2024

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REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: David Hodgson, Strategic Director for Corporate Resources

Title: Household Support Fund scheme 6

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 This report seeks Members' agreement to delegate authority to agree a scheme for disbursing funding from the sixth Household Support Fund to the Strategic Director for Corporate Resources in consultation with the Leader and the Portfolio Holder for Housing, Homelessness Prevention & Customer Services.

2. Recommendations:

2.1 That Executive agrees and RECOMMENDS to Council that the Strategic Director for Corporate Resources is given delegated authority to agree the scheme for disbursing funding from the sixth Household Support Fund in consultation with the Leader and the Portfolio Holder for Housing, Homelessness Prevention & Customer Services.

3. Reasons for the recommendation:

3.1 On 2 September, the Secretary of State for Work and Pensions announced a further extension to the Household Support Fund to run from 1 October 2024 for six months. This presents a challenge to get Council approval of a scheme in time to be able to distribute these funds through the early winter period.

3.2 Funding is given by the Department for Work and Pensions (DWP) to Devon County Council (DCC), who distribute their allocation to fund free school meals during the holidays and other support initiatives across the county, then give an allocation to each district authority to fund their local support scheme via a grant agreement.

3.3 The DWP has not yet released their guidance or confirmed funding allocations. Both will inform the grant agreement the Council will get from DCC and the requirements that need to be followed in a local scheme. The criteria and the specification of our scheme can only be determined once the DWP guidance is available and grant allocations and framework agreed with DCC. As with the previous five Household Support Fund Schemes, HSF6 is targeted at low-income households who are struggling with the cost of

essentials. In order to give the most effective help, the new scheme design is likely to remain similar to previous iterations.

4. What are the resource implications including non-financial resources

4.1 Scheme administration as well as the funding for customer grants are fully funded via a Funding Agreement with Devon County Council. Having already run five Household Support Schemes, the resources are already in place to deliver a further scheme along similar lines.

4.2 Payment of customer grants will only be made up to the value of the grant agreement. The scheme will be administered by existing staff within the Benefits & Welfare service, include two temporary Welfare Assistance Officers funded through the HSF administration grant. Beyond officer time there is therefore no cost to Exeter City Council.

5. Section 151 Officer comments:

5.1 The Council has again been given a short notice period for this six-month extension of the scheme. To avoid this risk of having insufficient time to spend the funds, it is necessary for a delegation to be requested. As far as is possible under the terms that the Council has to follow, the scheme will use the same principles that have been adopted for the previous rounds of funding.

6. What are the legal aspects?

6.1 Section 31 of the Local government Act 2003 provides a power for Ministers of State to pay grants to local authorities for expenditure incurred or to be incurred by authorities. In accordance with section 31 of the Act, Devon County Council will be receiving funding from the Department for Work and Pensions (DWP) for the provision of grants in the form of the Household Support Fund. Devon districts, including Exeter City Council, will be allocated funding by Devon County Council to deliver local support schemes in accordance with the Household Support Fund 6 Grant Agreement. The conditions on the allocation of the grant funds will be set out in the agreement between Devon County Council and Exeter City Council. Guidance will be provided by the DWP.

6.2 The funding is intended to be provided to households most in need of support with, for example, energy bills, food, and other essentials in order to address the significant increases in the cost of living. The funds are not to be used for any economic undertaking. Accordingly, the allocation of the grant funds falls outside the scope of the Subsidy Control Act 2022.

7. Monitoring Officer's comments:

7.1 Members will note the purpose of the Household Support Fund scheme and the basis of the allocation of the scheme funds as set out in the legal aspects above. As was the case in relation to Scheme 5, Exeter City Council does not yet know the funding amount it will receive, nor the scheme guidance for Scheme 6. Accordingly, the recommendation is that authority is delegated to agree the scheme for administering the funds once this information is received. This will allow Officers to get the scheme up and running in good time to provide household support over the winter period.

8. Report details:

8.1 The fifth Household Support Fund scheme has to close on 30 September or sooner if funds have run out. Household Support Fund Scheme 6 will run from 1 October 2024 to 31 March 2025.

8.2 Exeter City Council will receive funding from Devon County Council to deliver support to low-income residents struggling with the cost of living. The Central Government funding is to be spent in line with the Department for Work and Pensions (DWP) guidance and the framework agreed with Devon County Council.

8.3 Once DWP guidance has been issued, and allocations have been confirmed, Devon County Council will work with the district authorities on a framework agreement which will inform local scheme design. This work is likely to be ongoing through September, meaning a detailed scheme design cannot be delivered at this stage.

8.4 The Benefits & Welfare Team are currently administering Household Support Fund Scheme 5 and have run four earlier schemes from October 2021. These schemes have been a mixture of direct awards and an application process; therefore, the mechanisms are already in place to deliver similar for scheme 6.

8.5 The five Household Support Fund schemes have shared common objectives which will also likely apply to the sixth scheme. Funding is intended to support low-income households who are struggling to afford essentials due to the increased cost of living. Within that framework there is discretion for who to support and how to deliver it.

8.6 Previous schemes have helped inform what works well locally, who our most in need households are and how best to provide them with financial support. During the second half of the fourth scheme, and throughout the fifth, we have operated an application-based scheme, open to anyone in need but specifying priority groups for support. Those priority groups have been drawn from national and local research and our own analysis of benefit caseload.

8.7 It is anticipated that a sixth scheme, subject to guidance and funding, will largely follow the principles and approach developed through the fourth and fifth schemes. An application-based approach means individual circumstances can be considered allowing more targeted awards. Using the insights from our Council Tax Support caseload we were also able to promote the availability of support to priority households who may not be aware of the scheme. This proved particularly successful in encouraging claims from our elderly customers who were much less likely to claim without support.

8.8 Using Council Tax Support records allows us to identify low-income households with characteristics that indicate a particular need for extra help. Awards can then be directly targeted at these households, without the need for an application.

8.9 Priority groups identified through the earlier schemes as being in particular need of support from HSF include:

- Households affected by welfare reforms (large families, local housing allowance rules, under 25 rate of Universal Credit);
- Unpaid carers;

- Households including a disabled child;
- Households with temporarily higher expenditure (families in temporary accommodation, parent temporarily unable to work);
- Care experienced young people;
- Households including a member of pensionable age – particularly relevant for HSF 6 in light of the changes to Winter Fuel Payment in paras 8.11

8.10 With less than a month left of HSF scheme 5, more than £290,000 has been delivered to over 2100 households. More than half of these households included a dependent child and 43% included at least one disabled household member. Only 14% of applications were from low-income pensioner households. More than 80% of the pensioner applications were received as a result of a targeted mailout highlighting the availability of the scheme and offering support to make their claims.

8.11 From winter 2024, pensioners' Winter Fuel payments will be linked to a means tested benefit for the first time. In most cases this will mean being in receipt of Pension Credit. Take up rates of Pension Credit are traditionally low and it is likely that many low-income pensioner households will lose out on their Winter Fuel Payment as a result.

8.12 The Benefits & Welfare service will be involved in encouraging and assisting pensioners who may be entitled to Pension Credit to make a claim. However, there are households who, despite being on a low income, will not qualify for Pension Credit and will therefore lose their Winter Fuel payment. The sixth Household Support Fund can use Council Tax Support records to identify many of these customers and provide support through a direct award. This will overcome the generally low rates of proactive applications seen across the pensioner group.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Household Support Fund scheme 6 will support Exeter's communities and neighbourhoods by helping low-income households manages increased costs through the winter months.

10. What risks are there and how can they be reduced?

10.1 If a scheme is not in place and support delivered before 31 March 2025, the available funding will not be able to be provided to Exeter's low-income residents.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority

from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 This recommendation has no impact. An Equalities Impact Assessment will be carried out at the time a local scheme is designed.

12. Carbon Footprint (Environmental) Implications:

12.1 No direct carbon/environmental impacts arising from the recommendations.

13. Are there any other options?

13.1 Utilising the next committee cycle would mean not being able to make any crisis support payments between 1 October and 17 December and risks a significant proportion of funding going unspent.

Strategic Director for Corporate Resources, David Hodgson

Author: Chris Buckman, Benefits and Welfare Lead

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

Report of: Strategic Director Corporate Resources

Title: Public Sector Decarbonisation Scheme 3b Project – RAMM & Riverside Leisure Centre

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 This report summarises the outcome of the work undertaken to date exploring the implementation of decarbonisation measures at RAMM (RAMM) and the Riverside Leisure Centre, funded by the Public Sector Decarbonisation Scheme 3b grant from central government. Importantly, the report concludes that, due to challenges at both sites and the immovable grant funding spend deadline, the project overall cannot proceed.

1.2 The City Council declared a Climate Emergency in 2019 and as part of this commitment, the Council aims to achieve net zero Green House Gas (GHG) emissions for its own corporate activities by 2030. In 2021, the City Council commissioned a carbon footprint baseline report, undertaken and completed by the Centre for Energy and the Environment, at the University of Exeter.

1.3 The Carbon Footprint report sets out a range of carbon reduction measures, including the decarbonisation of heat, and identifies key sites producing high levels of carbon emissions. The highest consuming sites across the corporate estate are RAMM and the Riverside Leisure Centre. Both buildings fulfil the funding criteria set out by the Government's Public Sector Decarbonisation Scheme (PSDS), a government grant for public sector bodies to fund heat decarbonisation and energy efficiency measures.

1.4 In March 2023, the City Council secured PSDS 3b funding from Salix (on behalf of the then 'Department for Business, Energy and Industrial Strategy'), securing a grant of up to £6.392m, with a contribution of £0.871m required from the Council. A requirement and condition of the grant is that grant monies are to be spent by 31st March 2025, they cannot be carried into the financial year 2025/2026.

1.5 The grant, to be spent over two years, would fund:

- a) Year 1 activities to explore heat decarbonisation and efficiency measures which include designing & pricing low carbon air and water source heat pump solutions at both RAMM and the Riverside Leisure Centre,
- b) Year 2 activities to procure, install, commission and handover the decarbonisation measures at each site.

1.6 The outcome of the Year 1 exploration, design & pricing stage has identified significant challenges to delivering within the timeframe, budget and quality parameters required at both sites. These challenges cannot be overcome and sufficient progress made in the remainder of this financial year to accord with the requirements of the grant financial year expenditures. On the basis of the findings to date and the funding spend deadline, the project presents too much risk to the City Council to proceed.

2. Recommendations:

It is recommended that Council approve:

2.1 That following due consideration the outcomes of the Year 1 exploration, design, and pricing stages, the PSDS 3b project (RAMM & Riverside) does not proceed any further; and

2.2 Officers to allocate time to progress matters in preparation for future funding opportunities to secure monies required to decarbonise both sites.

3. Reasons for the recommendation:

3.1 The outcomes of the feasibility, design, and pricing stage of the PSDS 3b project at RAMM & the Riverside Leisure Centre has resulted in the position that the progression of PSDS 3b measures at either site is not, at this stage, acceptable to the City Council.

3.2 To continue spending money on the PSDS 3b projects will expose the City Council to unacceptable levels of uncertainty and financial risk.

3.3 The work undertaken in the feasibility, design and pricing stage has identified challenges to be overcome and opportunities for success which can be progressed & explored in order to be in a good position for the successful application for & delivery of future decarbonisation grants at the two sites.

4. What are the resource implications including non financial resources

4.1 Salix have advised that the costs for the works undertaken to date are recoverable from the PSDS 3b grant. The total spend to end of June 2024 is £553,346.93, although further final invoices and costs are awaited.

4.2 PSDS Phase 4 is expected to be released later this autumn and it is hoped the Council can utilise the information and understanding gained during the PSDS 3b exercise to bid again for funding and deliver a revised project.

4.3 To resolve issues identified in PSDS 3b and to ensure the City Council is ready to bid for future rounds of PSDS grant funding, further surveys to establish different solutions and identify alternative locations on site will be required. It will also be necessary to obtain clarity from National Grid on their timescales for providing additional electrical supply where needed. These matters will require officer time and may require funding for third party surveys / input (to be confirmed).

5. Section 151 Officer comments:

5.1 Whilst disappointing, this recommendation protects the Council from unacceptably high levels of risk. The work undertaken so far will be useful in assisting with any future bid for decarbonisation funding and will provide valuable information to underpin a bid.

6. What are the legal aspects?

6.1 This report sets out the reasons for not proceeding with the decarbonisation measures at the RAMM and Riverside Leisure Centre. It does not raise any legal issues which are relevant to that decision.

7. Monitoring Officer's comments:

7.1 The project cannot proceed due to the challenges set out in this report. It has been identified that these challenges cannot be overcome and that to proceed with the project would present an unacceptable level of risk to the Council. The proposal not to proceed any further with the project ensures that the Council is not exposed to an unacceptable level of financial risk.

8. Report details:

8.1 Exeter City Council declared a Climate Emergency in 2019 and as part of this commitment, the City Council set a target to achieve net zero Green House Gas (GHG) emissions for its own corporate activities by 2030. Decarbonising heat is a key part of the City Council's Carbon Reduction Plan to reduce consumption, provide energy efficiency and meet with government policy to deliver clean heat.

8.2 To understand, manage and monitor the organisations GHG emissions, the Net Zero team commission an annual organisational GHG Inventory report, provided by the Centre for Energy and the Environment. This year's report was presented to Scrutiny Committee in March. The inventory reported that emissions from the City Council's owned non domestic buildings (commercial property) represent 42% of the Council's carbon footprint. Grant funding opportunities are constantly sought for energy efficiency and decarbonisation measures across the commercial property estate, with decarbonisation plans being developed for key sites.

8.3 The Government's PSDS fund is awarded based on the highest amount of direct carbon emission reductions saved, as well as criteria such as, a building must have fossil fuel heating and/or cooling system and be over 10 years old. For the highest consuming commercial sites being RAMM and the Riverside Leisure Centre, funding is essential. In March 2023, the City Council secured a PSDS 3b grant of up to £6.392m, with a City Council contribution of £0.871m resulting in a total £7.263m budget.

8.4 It is a requirement of the funding that the grant monies will need to be spent by 31st March 2025, any grant underspend by 31st March 2025 will not be carried over into financial year 2025/2026. To manage the commitments of the City Council and Salix, the City Council divided the project into two clear and distinct phases. The first phase being the investigation, exploration, design, and procurement of the solutions at each site, whilst the second phase is for the installation and commissioning of the solutions.

8.5 A competitive tender exercise was undertaken in June/July 2023 and a specialist contractor was appointed in August 2023 for the first phase of the project.

8.6 The outcome of the works to date within the initial phase have found that:

8.6.1 **RAMM**

Having developed the design and associated solutions, the contractor has advised that, to deliver the decarbonisation measures proposed, would cost circa £1m over the allowed budget.

The contractor has also reported that the challenges of the site location (a reduced level dig in the green space at the rear of the RAMM building with proximity to the Exeter Phoenix building, adjacency to the wall at Northernhay Gardens, proximity to the Roman Wall, limited accessible width on the highway route into the rear of RAMM) create logistical constraints which render the scheme undeliverable within acceptable cost and disruption parameters.

Additionally, the formal Connection Offer received from National Grid for the increased electricity supply required for the Air Source Heat Pumps on site is subject to planned reinforcement of the electricity network in the city and that the required additional electricity required at RAMM will take between 3 to 6 years to provide.

Unfortunately, there is not sufficient time remaining in Financial Year 2024/2025 to resolve the outstanding issues, develop alternative solutions, and spend the full grant monies before the grant expenditure deadline of 31st March 2025 (total grant funding remaining to be spent in 2024/2025 is just under £5m)

8.6.2 **Riverside**

The contractor has undertaken the design and procurement activity and provided an Offer for the installation & commissioning phase works. However, there are a number of issues and concerns:

- uncertainty over the remaining life of the existing roof metal deck;
- uncertainty in relation to the internal areas affected by changing the roof, including exact locations to be closed or restricted to the public, duration of closures to the affected areas;
- uncertainty on the extent of likely damage and necessary repair to the internal areas as a result of changing the roof;
- risks in connection with the surety of outturn cost;
- uncertainty on the overall programme duration, and
- unagreed contractual conditions and risk allocation proposed by the contractor in their offer.

8.7 All of the above result in the conclusion that the project contains too much risk (at this stage) to confidentiality assess that the project will be delivered to budget, time, and quality parameters. Therefore, the offer has not been accepted by the City Council.

8.8 The time required to conclude the unresolved matters to the satisfaction of the City Council, then undertake the works required on site, would materially compromise the ability to meet the grant funding spend deadline of 31st March 2025.

8.9 Alternate options considered and explored were:

a) The City Council approached Salix and sought an extension to the grant spending deadline of 31st March 2025. With the spending deadline extended, the projects would have time to explore different solutions and / or satisfactorily conclude currently unresolved matters. Unfortunately, Salix have confirmed that an extension to the grant spending deadline is not possible.

b) In order to build on the work to date and put the RAMM site in a good position for future PSDS funding rounds, the City Council approached Salix to understand if grant monies can continue to be spent this financial year exploring and developing solutions in alternative locations – accepting that the actual delivery of the project (& full grant funding expenditure) cannot be achieved this financial year. Unfortunately, it was confirmed that the grant monies can only be spent on the basis that the grant outcomes can be achieved within the PSDS 3b funding. Therefore, further grant expenditure exploring alternative options for the site is not possible.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The recommendations within this report support a number of City Council strategic priorities, including:

- Leading a Well-Run Council;
- A balanced budget;
- Value For Money Services; and
- Well Manged Assets

9.2 If the next PSDS grant application is a success, phase 2 of the decarbonisation of both RAMM and the Riverside Leisure Centre will support the Strategic Priority of Net Zero Carbon City and Leading a Well-Run Council.

10. What risks are there and how can they be reduced?

10.1 Additional surveys are being sought for both sites, so when the next PSDS funding application is submitted and is successful, work can start immediately.

10.2 The original officer working group set up to drive forward this particular project, will continue to meet to reduce and eliminate the barriers to decarbonising both RAMM and the Riverside Leisure Centre.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and

- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 The Net Zero team will take into account the potential impact of actions in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision. A separate EQIA will be developed for future PSDS projects.

12. Carbon Footprint (Environmental) Implications:

12.1 Not to proceed with the project will mean carbon emissions will remain unchanged at RAMM & the Riverside Leisure Centre. However, the work undertaken in the feasibility, design and pricing stage has provided detailed information required to overcome challenges, together with opportunities which can be progressed. Consequently, the City Council will be in a good position for future funding rounds, to deliver decarbonisation measures needed at the two sites, reduce carbon emissions, and contribute to the Council's Net Zero target.

13. Are there any other options?

13.1 The alternative options are listed within 8.9.

Strategic Director Corporate Resources

Author: Net Zero Project Manager, City Centre & Net Zero

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

Report of: The Strategic Director for Place

Title: Annual Infrastructure Funding Statement 2023 - 2024

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 This report brings the Annual Infrastructure Funding Statement for 2023 - 2024 to the attention of Members for information. The statement sets out retrospective information relating to funding secured, received, committed, and spent from the Community Infrastructure Levy (CIL) and well as Section 106 monies. It also includes an Infrastructure List identifying a series of projects which could benefit from Community Infrastructure Funding. It does not however provide financial commitments to any project set out in the Statement.

2. Recommendations:

2.1 That the Executive notes the content of the Annual Infrastructure Statement for 2023 - 2024 prior to its publication.

3. Reasons for the recommendation:

3.1 The Community Infrastructure Levy Regulations, as amended in 2019, require Councils to publish an Annual Infrastructure Funding Statement including information about CIL and Section 106 funding and infrastructure projects which could be funded from CIL.

3.2 The 2023 – 2024 Infrastructure Funding Statement includes factual information regarding CIL and Section 106 obligations and identifies potential infrastructure projects without making financial commitments. On this basis, the Infrastructure Funding Statement is approved under the scheme of delegation by the Strategic Director for Place with agreement from the Leader of the Council and the Portfolio Holder for City Development. The Statement will be made available on the City Council's website and is attached to this report at Appendix A.

3.3 This report provides a summary of the key content of the 2023 - 2024 Infrastructure Funding Statement and provides Members with an opportunity to discuss the information it contains.

4. What are the resource implications including non-financial resources?

4.1 The 2023 - 2024 Annual Infrastructure Funding Statement (covering financial year 2023/24) sets out factual information regarding CIL and Section 106 receipts and expenditure. It also includes an 'Infrastructure List' of projects which could benefit from CIL funding in future. It should be noted that decisions on the non-neighbourhood element of CIL spend (the larger projects) will continue to be made through Executive and Full Council. On this basis, the Statement does not make commitments over future CIL expenditure.

4.2 In terms of financial implications, since the CIL was implemented in 2013 it has provided over £31m. This income is delivered through the planning process and is a major contributor to delivering the City Council's Corporate Plan and Medium-Term Financial Plan. The funding from CIL receipts will not be sufficient to pay for all the infrastructure Exeter needs to support housing growth and placemaking.

4.3 In theory CIL empowers local authorities to secure the necessary funding for the infrastructure supporting growth and sustainable development in their locality. However, it is not a consistent funding source for infrastructure. Receipts will be affected by a number of factors which are difficult to forecast. In addition, the revised Charging Schedule has amended CIL charges. This, alongside a change in development strategy to focus on brownfield sites, could affect future CIL receipts.

5. Section 151 Officer comments:

5.1 There are no specific financial implications contained within this report for Council to consider. Any allocation of CIL funding to support any of the projects identified in the 'Infrastructure List' would require Council approval either through a dedicated report or via an amendment or addition to the Council's Capital Programme.

6. What are the legal aspects?

6.1 The preparation and publication each year of an Annual Infrastructure Funding Statement is a requirement of the Community Infrastructure Levy Regulations 2010 (as amended).

6.2 Regulation 121A states amongst other things that no later than 31st December in each calendar year a Charging Authority must publish a document which comprises the following: (a) a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL, (b) a report about CIL, in relation to the previous financial year, which includes a break-down of CIL receipts and expenditure as well as (c) a report about planning (section 106) obligations, in relation to the reported year, which includes planning obligations spent and received.

The publication of the Annual Infrastructure Statement for 2023-2024 is intended to meet the requirements set out in Regulation 121A and sets out factual information regarding CIL and section 106 obligations, as well as identifying potential infrastructure projects which could be wholly or partly funded by CIL without making binding financial commitments.

7. Monitoring Officer's comments:

7.1 The Infrastructure Funding Statement will enable Members to consider projects in a planned and structured way where competing interest/priorities can be evaluated.

8. Report details:

Community Infrastructure Levy report

8.1 The Annual Infrastructure Funding Statement includes a report (section of the Statement) which provides financial information regarding the amount of CIL secured, received, and committed in 2023/24, together with CIL expenditure.

8.2 Some of the key details are summarised below:

- Total CIL received at the end of March 2023 (since first implemented): £31.68m
- Total CIL spent on infrastructure projects (since first implemented): £14.22m
- Total CIL committed to infrastructure projects at the end of 2023/24: £9.57m
- Total value of CIL receipts for 2023/24: £4.75m
- Total value of CIL expenditure for 2023/24: £1.28m

8.3 The CIL expenditure in 2023/24 was on the following projects:

Project	£
Neighbourhood CIL	553,223
Play Area Capital Expenditure	175,086
Habitat Mitigation	167,672
Infrastructure Maintenance	160,000
Administration	156,270
St Thomas Splash Pad	41,475
Northbrook Wild Arboretum	16,096
MRF	13,500
TOTAL	1.283m

8.4 While CIL can provide a significant source of funding, there are several reasons why it should not be relied upon as a primary or consistent income source for local authorities.

8.5 CIL income depends on the level of development activity in the area, which can fluctuate due to economic conditions, changes in the housing market, or shifts in planning policy and/or Charging Schedule. As receipts are tied to new developments, they are contingent on the approval and completion of projects. Any delays or reductions in development activity can lead to a significant drop in CIL income.

Section 106 report (planning obligations)

8.6 The Annual Infrastructure Funding Statement includes a report which provides financial information regarding the planning obligations secured through the Section 106 process, together with monies received, committed, and spent on specific projects.

8.7 Some of the key details are summarised below:

- The total funding to be provided under planning obligations which were entered into in 2023/24: £861,870.06.
- The total funding under planning obligations which was received during 2023/24: £1,058,668.6.
- The total number of affordable homes secured by Section 106 Agreements signed in 2023/24: 24
- The total funding from planning obligations which was spent by the authority in 2023/24: £2,477,596.29

8.8 The Section 106 expenditure was on the following projects:

- | | |
|---|---------------|
| • Affordable housing: | £2,419,094.99 |
| • Community Facilities: | £1,250.00 |
| • Commuted sums-infrastructure maintenance: | £57,251.30 |

Infrastructure list

8.9 Finally, the Annual Infrastructure Funding Statement identifies a series of infrastructure projects which, in future, could be funded wholly, or in part, by the Community Infrastructure Levy. This is the 'Infrastructure List'. Due to the uncertain nature of future CIL receipts, this list should be regarded as a statement of the direction of travel, identifying the type of projects which could be funded through CIL. It does not identify specific funding commitments or allocate CIL to particular projects. It should also be noted that there will not be sufficient CIL funding to cover all projects on the list.

8.10 The Infrastructure List details a range of projects relating to strategic priorities set out in the Corporate Plan and includes schemes which will support development within the Liveable Exeter initiative and Exeter Plan, green infrastructure, net zero ambitions, cultural projects, environmental enhancement, community infrastructure and key maintenance. The list is not exhaustive.

8.11 Further projects would be funded from the neighbourhood proportion of CIL which is a slice of receipts for community projects. This funding is considered through the Grants Programme and the Exeter Grants Panel.

Future work

8.12 As set out above, there is a statutory requirement to produce an Infrastructure Funding Statement annually to cover the associated financial year. This statement covers 2023/24. Further work is required on a Community Infrastructure Levy funding programme setting out key financial commitments to future infrastructure projects.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Infrastructure List within the Annual Infrastructure Funding Statement includes a series of projects which, if funded, could support all five of the key priorities in the Corporate Plan:

- Prosperous local economy
- Healthy and active city
- Housing and building great neighbourhoods and communities
- Net zero carbon city
- Thriving culture and heritage

10. What risks are there and how can they be reduced?

10.1 The Annual Infrastructure Funding Statement provides factual information regarding the Community Infrastructure Levy, planning obligations and sets out projects which could be funded from CIL receipts. It does not make formal financial commitments. The Infrastructure Funding Statement is also subject to annual review which mitigates any residual risks. There are therefore no specific risks to consider.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- Eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- Advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- Foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending that Executive notes the content of the 2023/24 Annual Infrastructure Funding Statement no potential negative impact has been identified on people with protected characteristics as determined by the Act and an Equalities Impact Assessment has been included in the background papers for Members' attention.

12. Carbon Footprint (environmental) Implications:

12.1. There are no direct carbon/environmental impacts arising from the recommendation to note the content of the 2023/24 Annual Infrastructure Funding Statement as the document does not set Council policy nor make financial commitments. The Infrastructure List within the Infrastructure Funding Statement does however specifically set out the potential for using CIL monies to support net zero carbon infrastructure (subject to formal agreement through separate processes).

13. Are there any other options?

13.1. The preparation of an Annual Infrastructure Funding Statement is a statutory requirement. There are no appropriate alternatives to noting the content of the document.

Strategic Director for Place, Ian Collinson

Author: Sulina Tallack – Principal Project Manager : CIL & S106

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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Annual Infrastructure Funding Statement



2023/24 Report

Exeter City Council

Annual Infrastructure Funding Statement

2023/24

Exeter City Council
Civic Centre
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Exeter
City Council

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4. FUTURE CIL RECEIPTS
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1. Introduction

1.1. Background

1.1.1. The Community Infrastructure Levy Regulations, as amended in 2019, require Councils to publish an Annual Infrastructure Funding Statement (AIFS), including information about CIL and Section 106 funding. These statements are required each financial year from 2020. This AIFS covers the financial year 2023/24.

1.2. Contents of the Annual Infrastructure Funding Statement

1.2.1. Guidance on contents of the AIFS is set out in the Planning Practice Guidance within the section on the Community Infrastructure Levy¹ (paragraph 75 onwards). The report is required to include:

- A report relating to the previous financial year on the Community Infrastructure Levy;
- A report relating to the previous financial year on Section 106 planning obligations;
- A report on the infrastructure projects or types of infrastructure that the authority intends to fund wholly or partly by CIL (excluding the neighbourhood portion). This is known as the Infrastructure List.

1.2.2. This AIFS is divided into the relevant sections above.

¹ Available at: [Community Infrastructure Levy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/community-infrastructure-levy)

2. Community Infrastructure Levy (CIL) reporting

2.1. CIL implementation

2.1.1. Exeter City Council implemented CIL in 2013. Since then, CIL has been charged consistently for the following development types across the city:

- Residential;
- Purpose built student housing; and
- Out of city centre retail.

2.1.2. Section 106 Agreements run in parallel with the charging of CIL.

2.1.3. A revised CIL charging regime was implemented in January 2024. From this point the Council also charges for the following uses but has 'zero rated' flatted development.

- Build to rent; and
- Co-living.

2.2. CIL data

2.2.1. The planning practice guidance sets out in detail what information regarding CIL has to be included in the AIFS. A list of this data is included below:

- The total CIL receipts for the reported year;
- The total CIL expenditure for the reported year;
- Summary details of CIL expenditure during the reported year including:
 - The items of infrastructure which have been funded by CIL;
 - The amount of CIL expenditure on each item;
- The amount of CIL applied to repay money borrowed, including interest, with details of the infrastructure items which that money was used to provide;
- The amount of CIL applied to administrative expenses and that amount expressed as a percentage of CIL collected in that year; and
- The total amount of CIL receipts retained at the end of the reported year.

2.2.2. In advance of the detailed information, the points below summarise the key figures relating to CIL receipts and expenditure over recent years and since CIL was implemented in 2013.

- CIL received as at end of March 2024 since implementation: £31.68m
- CIL provided to administration since implementation: £748,507 (approximately £156,270 in 2023/24).
- CIL provided to neighbourhood projects since implementation: £4.32 m (approximately £553,220 spent on neighbourhood projects in 2023/24).
- CIL provided to habitat mitigation since implementation: £1.35m (£167,672 in 2023/24).
- Total CIL spent or committed to capital infrastructure projects: £14.22m.

2.2.3. The tables on the following pages list the key data for CIL in Exeter for the reporting year 2023/24. The reference numbers relate to the sections of the 2019 CIL Regulations, Schedule 2.

Annual Infrastructure Funding Statement: 2024

2.2.4. Table 1 sets out figures relating to the amount of CIL charged and collected.

Reference	Description	Value
1 (a)	The total value of CIL set out in all demand notices issued in the reporting year	£6,298,451.58
1 (b)	The total amount of CIL receipts for the reported year	£4,751,953.96
1 (c)	The total amount of CIL receipts, collected by the authority, or by another person on its behalf, before the reported year but which have not been allocated	£390,611.00
1 (d)	The total amount of CIL receipts, collected by the authority, or by another person on its behalf, before the reported year and which have been allocated in the reported year	£1.84m

Table 1: Details regarding CIL charged and collected in 2023/24

2.2.5. Table 2 sets out figures for CIL expenditure.

Reference	Description	Value
1 (e)	The total amount of CIL expenditure for the reported year	£1,283,322.45
1 (f)	The total amount of CIL receipts, whenever collected, which were allocated but not spent during the reported year	£9,565,313.00
1 (g)	(i) The items of infrastructure on which CIL (including land payments) has been spent, and the amount of CIL spent on each item	Total: £573,829 Play Area capital expenditure: £175,086 Northbrook Wild Arboretum £16,096 MRF: £13,500 Habitat mitigation: £167,672 St Thomas Splash Pad: £41,475 Infrastructure maintenance: £160,000.00
	(ii) The amount of CIL spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part)	£0
	(iii) The amount of CIL spent on administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation	£156,270.07 3% total receipts

Table 2: Details of CIL expenditure in 2023/24

Annual Infrastructure Funding Statement: 2024

2.2.6. Table 3 sets out figures for how CIL has been allocated (when not spent), including to projects led by other organisations and community groups (the neighbourhood proportion of CIL receipts).

Reference	Description	Value
1 (h)	In relation to CIL receipts, whenever collected, which were allocated but not spent during the reported year, summary details of the items of infrastructure on which CIL (including land payments) has been allocated, and the amount of CIL allocated to each item	Total: £9,565,313.00 Northbrook Wild Arboretum: £206,519 Play Area capital: £566,904 Heavitree Paddling Pool: £410,000 MRF (Materials Reclamation Facility): £6,464,180 Pinhoe Hub: £1,222,710 Monkerton cycle route: £375,000 Infrastructure Maintenance: £320,000
1 (i)	The amount of CIL passed to: (i) Any parish council under regulation 59A or 59B; and	£0. There are no Parish Councils in Exeter. £0.
1 (j)	(ii) Any person under regulation 59 (4); Summary details of the receipt and expenditure of CIL to which regulation 59E or 59F applied during the reported year including – (i) The total CIL receipts that regulations 59E and 59F applied to; (ii) The items of infrastructure to which the CIL receipts to which regulations 59E and 59F applied have been allocated or spent, and the amount of expenditure allocated or spent on each item;	£553,223 <ul style="list-style-type: none"> • Wellbeing Exeter, • CAB, • Voluntary and Community Social Enterprises • Small grants
1 (k)	Summary details of any notices served in accordance with regulation 59E, including: (i) The total value of CIL receipts requested from each parish council; (ii) (ii) Any funds not yet recovered from each parish council at the end of the reported year;	£0 There are no Parish Councils in Exeter.

Annual Infrastructure Funding Statement: 2024

Reference	Description	Value
1 (l)	(i) CIL receipts for the reported year retained at the end of the reported year other than those to which regulation 59E or 59F applied	£7,499,800
	(ii) CIL receipts from previous years retained at the end of the reported year other than those to which regulation 59E or 59F applied	£3,107,127.69
	(iii) CIL receipts for the reported year to which regulation 59E or 59F applied retained at the end of the reported year	£429,504.00
	(iv) CIL receipts from previous years to which regulation 59E or 59F applied retained at the end of the reported year.	£0

Table 3: Details of CIL allocations in 2023/24

3. Section 106 reporting

3.1. Section 106 Agreements

3.1.1. Alongside CIL, Exeter City Council also enters into Section 106 agreements with applicants and landowners to ensure that site-specific requirements related to development can be secured. These agreements are negotiated on a case-by-case basis and are used to secure affordable housing, infrastructure and community facilities and services.

3.2. Section 106 data

3.2.1. The planning practice guidance is less prescriptive about what level of data is reported related to Section 106 Agreements. However, the Council has taken a consistent approach and reports similar data sets for Section 106 receipts and expenditure as it does for CIL. On this basis it reports on:

- The total value of contributions secured in Section 106 Agreements in the reporting year;
- The total value of contributions received;
- Details of expenditure of Section 106 funding;
- Details of allocations of Section 106 funding; and
- The amount of Section 106 funding retained.

3.2.2. In advance of the detailed information, the points below summarise the key figures relating to CIL receipts and expenditure.

- The total funding to be provided under any planning obligations which were entered into during 2023/24: £861,870.06
- The total funding under any planning obligations which was received during 2023/24: £1,058,668.60.
- The total number of affordable housing units which were secured by Section 106s Agreements signed in 2023/24: 24
- The total funding from planning obligations which was spent by the authority in 2023/24: £2.48m

3.2.3. The tables on the following pages list the key data for Section 106 funding in Exeter for the reporting year 2023/24. The reference numbers relate to the sections of the 2019 CIL Regulations, Schedule 2.

Annual Infrastructure Funding Statement: 2024

3.2.4. Table 4 sets out figures relating to the amount of Section 106 funding secured and received during 2023/24.

Reference	Description	Value
3 (a)	The total amount of money to be provided under any planning obligations which were entered into during the reported year	£861,870.06
3 (b)	The total amount of money under any planning obligations which was received during the reported year	£1,058,668.6.
3 (c)	The total amount of money under any planning obligations which was received before the reported year which has not been allocated by the authority	£0
3 (d)	<p>Summary details of any non-monetary contributions to be provided under planning obligations which were entered into during the reported year, including details of:</p> <p>(i) In relation to affordable housing, the total number of units which will be provided</p> <p>(ii) In relation to educational facilities, the number of school places for pupils which will be provided, and the category of school at which they will be provided</p>	<p>24</p> <p>See Devon County Council reporting as Local Education Authority</p>

Table 4: Financial information regarding funding secured and collected via Section 106 Agreements: 2023/24

3.2.5. Table 5 sets out details relating to the amount of Section 106 funding allocated and spent during 2023/24

Reference	Description	Value
3 (e)	The total amount of money (received under any planning obligations) which was allocated but not spent during the reported year for funding infrastructure	£1,044,268.60
3 (f)	The total amount of money (received under any planning obligations) which was spent by the authority (including transferring it to another person to ...)	£2,477,596.29
3 (g)	In relation to money (received under planning obligations) which was allocated by the authority but not spent during the reported year, summary details of the items of infrastructure on which the money has been allocated, and the amount of money allocated to each item	<p>Total: £1,044,268.60</p> <ul style="list-style-type: none"> • Community facilities • Affordable housing • Habitat Mitigation • Health provision • Sports facilities • Open space provision

Annual Infrastructure Funding Statement: 2024

3 (h)	In relation to money (received under planning obligations) which was spent by the authority during the reported year (including transferring it to another person to spend) summary details of:	<p>Total: £2,477,596.29</p> <p>Affordable housing: £2,419,094.99</p> <p>Community facilities £1,250.00</p> <p>Infrastructure maintenance £57,251.30</p>
	<p>(i) The items of infrastructure on which that money (received under planning obligations) was spent, and the amount spent on each item</p> <p>(ii) The amount of money (received under planning obligations) spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part)</p> <p>(iii) The amount of money (received under planning obligations) spent in respect of monitoring (including reporting under regulation 121A) in relation to the delivery of planning obligations)</p>	<p>£0</p> <p>£0</p>
3 (i)	The total amount of money (received under any planning obligations) during any year which was retained at the end of the reported year, and where any of the retained money has been allocated for the purposes of longer term maintenance ("commuted sums")	£261,838.10

Table 5: Financial information regarding funding allocated and via Section 106 Agreements: 2023/24

Annual Infrastructure Funding Statement: 2024

3.2.6. Table 6 sets makes reference to Highway Agreements (note that Highway Agreements are not entered into by the Council).

Reference	Description	Value
4 (a)	Summary details of any funding or provision of infrastructure which is to be provided through a highway agreement under section 278 of the Highways Act 1980 which was entered into during the reported year	See Devon County Council reporting as Highway Authority
4 (b)	Summary details of any funding or provision of infrastructure under a highway agreement which was provided during the reported year.	See Devon County Council reporting as Highway Authority

Table 6: Financial information regarding Highway Agreements: 2023/24

4. Future CIL receipts

- 4.1 It is anticipated that CIL receipts will average £3.1m per year if development continues at the same pace as has occurred in recent years. This has been calculated based upon the average build out rates over 15 years i.e. 2006 – 2020 (most recent full evidence) and then taking the standard size of a dwelling and multiplying this by the CIL rate. We have then discounted the calculated sum by 35% as affordable housing is granted relief from being liable for CIL payments. This gives us an indicative amount to base our income projections on.

Therefore, the projected CIL income is as follows:

- Neighbourhood projects: £471k
- Administration: £157k
- Habitat Mitigation: £164k
- Strategic Infrastructure: £2.35m.

- 4.2 These figures are broad estimates based on an average floor area for new dwellings and affordable housing provided at 35%; the amount of affordable is to be considered by the Exeter Plan in future.
- 4.3 CIL receipts will be affected by a number of other factors which are more difficult to forecast, such as pace of development, CIL relief for self-build dwellings and windfall development. In addition, the revised Charging Schedule no longer charges for flatted development (although now charges for Build to Rent and Co-living) and this may impact receipts. Any new charging rate will take some time to implement and flow through into receipts or impact on development proposals.

5. Infrastructure List

5.1. Introduction

- 5.1.1. This section of the Annual Infrastructure Statement explains how CIL receipts may be spent. In doing so, it includes the Council’s Infrastructure List.
- 5.1.2. The Infrastructure List sets out the infrastructure projects/types which the Council could fund using CIL. It does not provide a level of commitment to this expenditure but provides a direction of travel to assist in planning infrastructure delivery.

5.2. CIL expenditure

- 5.2.1. Given the flexibility over how CIL can be spent, specific percentages of the CIL receipts are allocated to defined purposes in addition to more strategic infrastructure projects. Elements of CIL funding is allocated as follows (these are set by legislation and legal requirements to ensure development does not have inappropriate impacts on protected wildlife habitats):
- Neighbourhood funding (generally 15%) - Used to fund a range of community projects
 - Administration (up to 5%) - Used to fund CIL monitoring, collection and review of CIL rates
 - Habitat mitigation (% varies) – Used to contribute to mitigation measures to protect designated protected habitats. The Council works with East Devon and Teignbridge District Councils on a joint mitigation strategy.
- 5.2.2. Beyond the allocations above, the Council has already approved commitments to, and spent CIL on, a series of capital projects from the CIL received. These projects are identified in Table 7.

Infrastructure project	Amount (£)
St Sidwell’s Point	8,000,000
Marsh Barton railway station	1,300,000
Sandy Park junction reconfiguration	837,831
Monkerton to city centre cycle route (E4)	375,000
Salmonpool Swingbridge/Clapperbrook Lane realignment	30,000
Northbrook Arboretum	222,615
Play Areas capital	774,996
Heavitree Paddling Pool	410,000
St Thomas Splash Pad	41,475
Pinhoe Community Hub	1,222,710
MRF	644,680
Total	13,859,307

Table 7: Infrastructure commitments for CIL expenditure

5.2.3. These projects are at various stages of progression. Going forward, there is a need to consider further strategic infrastructure projects which could be funded from CIL. These projects are included in the Infrastructure List which is included in the next section.

5.3. The Infrastructure List

5.3.1. Looking ahead, Exeter must accommodate significant growth. On this basis the Council has embarked on the preparation of a new Local Plan (the Exeter Plan) to provide for the housing, jobs, infrastructure and environmental improvements required over the next 20 years.

5.3.2. A significant part of this growth agenda is meeting the housing need set by Government – approximately 13,000 over twenty years. The Council's Liveable Exeter initiative is working alongside the Exeter Plan to deliver development in a way which maximises development quality and meets other corporate priorities.

5.3.3. The corporate priorities are articulated in the Council's Corporate Plan and are as follows:

- Prosperous local economy
- Healthy and active city
- Housing and building great neighbourhoods and communities
- Net zero carbon city
- Thriving culture and heritage
- Leading a well-run Council

5.3.4. The first five of these priorities relate to development and infrastructure provision and therefore future investment decisions for CIL will need to play a role in delivering against these themes.

5.3.5. More detailed infrastructure planning work will be undertaken as the Exeter Plan and the Liveable Exeter initiative progress. However, it is expected that Community Infrastructure Levy receipts will be used to support the projects included in the Infrastructure List on page 16 onwards.

5.3.6. It should be noted that there remains scope to secure contributions for the same infrastructure projects and types through the Section 106 mechanism. The Council will seek such contributions where circumstances provide for this.

5.3.7. It should also be noted that while this Infrastructure List is a statement of the Council's intentions, it is subject to annual review and does not commit to funding a particular project. Budget commitments regarding how CIL is spent are made via the capital programme which is determined by the Full Council.

Infrastructure List

This Infrastructure List does not include all the smaller projects which would be funded from the neighbourhood proportion of CIL and which are considered through the Grants Programme and Exeter Grants Panel. The Council will continue to consider school funding requirements although education projects are generally anticipated to be funded through the Section 106 regime.

Development project	Infrastructure projects / types of infrastructure
Wonford Integrated Health and Wellbeing Hub	Redevelopment of existing sports, community centre and NHS primary care centre into a single integrated health and wellbeing hub, to include: <ul style="list-style-type: none"> • Multipurpose community and leisure facilities; • Community kitchen and garden • Integrated primary care centre • Potential mixed development including housing
Community Sports Village (Exeter Arena and ISCA Centre Site)	Development of the existing site to include: <ul style="list-style-type: none"> • Recreational and sporting cycle hub for the city • Community swimming pool to replace the Northbrook Swimming Pool • New leisure centre to include sports hall, fitness suite, studios, soft play, martial arts centre, and multi-purpose community spaces • Multi-use club house • Playing pitch and play area improvements
Water Lane and Quayside/Canal Basin	<ul style="list-style-type: none"> • Strategic flood mitigation and access and egress measures. • Relocation of electricity bulk supply point. • Truncation of high pressure gas main. • Community facilities (potentially including managed workspace) • Sustainable transport measures, including mobility hub, Clapperbrook Lane highway improvements, and walking and cycling bridge over the canal.

	<ul style="list-style-type: none"> • Public realm improvements. • Land acquisition (for any of the purposes above)
Red Cow	<ul style="list-style-type: none"> • Strategic flood mitigation and access and egress measures. • Public realm improvements and walking and cycling route between St. David's Station and city centre. • Managed workspace. • Land acquisition (for any or all of the purposes above)
East Gate	<ul style="list-style-type: none"> • Public realm improvements including Heavitree Road corridor improvements • Sustainable transport measures. • Managed workspace. • Land acquisition (for any or all of the purposes above)
South Gate	<ul style="list-style-type: none"> • Sustainable transport and highway measures and public realm improvements
North Gate	<ul style="list-style-type: none"> • Sustainable transport measures
Marsh Barton	<ul style="list-style-type: none"> • Strategic flood mitigation and access and egress measures. • Sustainable transport measures. • Land acquisition (for business relocation and any other requisite purposes) • Utilities rationalisation, reinforcement and enhancement • Heat network infrastructure • Community and sports facilities
West Gate	<ul style="list-style-type: none"> • Strategic flood mitigation measures. • Sustainable transport measures and public realm improvements
Sandy Gate (Junction 30 of M5)	<ul style="list-style-type: none"> • Sustainable transport measures

Additional infrastructure projects may also be supported with CIL funding:

- Green infrastructure and habitats mitigation in the Valley Parks, Northbrook and other locations as necessary.
- Net zero carbon infrastructure including District Heating.
- Emergency access and egress arrangements relating to flood risk.
- Sustainable waste management Infrastructure.
- Cycle routes and associated infrastructure provision to encourage walking and cycling.
- Investment in cultural projects including in the city centre such as at the Corn Exchange.
- City centre infrastructure including environmental enhancements.
- Infrastructure maintenance such as at leisure centres, parks and play areas.
- Improvements to sports provision at King George V Playing Field.
- Community infrastructure including Pinhoe Community Hub.
- Additional cemetery provision

Annual Infrastructure Funding Statement



Contact details

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Civic Centre, Paris Street, Exeter, EX1 1JN

01392 265080

exeter.gov.uk/cil

exeter.gov.uk/planning-services

Please contact us to request this information in
an alternative format or language.

We consider requests on an individual basis.

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Equality Impact Assessment: Annual Infrastructure Funding Statement 2023-24

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive Committee 1st October 2024 Full Council 15 th October 2024	Annual Infrastructure Funding Statement 2023 - 2024	That Executive and Council notes the content of the Annual Infrastructure Statement for 2023 - 2024 before its publication	None specifically.

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed

decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 before its publication will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Sex/Gender	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Gender reassignment	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral	N/A	The recommendation note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Pregnancy and maternity including new and breast feeding mothers	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.
Marriage and civil partnership status	Neutral	N/A	The recommendation to note the content of the Annual Infrastructure Statement for 2023 - 2024 will have a neutral impact on groups with protected characteristics. CIL rates are charged on the basis of development viability evidence.

Actions identified that will mitigate any negative impacts and/or promote inclusion

None required.

Officer: Sulina Tallack

Date: 02.09.2024

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Strategic Director for Place

Title: RAMM business plan for Arts Council England National Portfolio Organisation extension year 2026-27

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 Arts Council England (ACE) has extended its funding period for National Portfolio Organisations (NPOs) by one year. The current funding period ends on 31 March 2026. ACE is allowing existing NPOs to apply for an extension year which would take the funding period up to 31 March 2027.

1.2 The Royal Albert Memorial Museum & Art Gallery (RAMM) is an Exeter City Council service and currently an NPO. The draft business plan for the extension year, is being submitted for endorsement by the Council.

1.3 Investment provided to the City Council by ACE through its NPO programme 2023-26 amounts to £618,363 per annum and if the application is successful, the City Council would receive an additional £618,363 for the extension year 2026-27.

2. Recommendations:

2.1 That Executive recommend to Council to:-

1. endorse the Royal Albert Memorial Museum & Art Gallery (RAMM) Business Plan;
2. To grant delegated authority to the Strategic Director for Place, in consultation with the Portfolio Holder for Arts, Culture & Tourism, to apply to Arts Council England for the additional year's funding (2026-27); and
3. authorise the Council to enter into the 2026-27 funding agreement with Arts Council England, should the application for funding be successful.

3. Reasons for the recommendation:

3.1 Investment from Arts Council England in 2026-27 will enable the City Council to deliver an additional year of activities at RAMM including: temporary exhibitions, events, community engagement, skills development, and contemporary art.

4. What are the resource implications including non-financial resources?

4.1 The City Council invests £2.4m in RAMM each year to fund its services.

4.2 While there is no direct cost to the City Council of RAMM's NPO status, the ACE funding is based on the museum being able to provide an overall financial plan showing it is financially viable.

4.3 The financial section of the draft business plan shows the projected breakdown of the 2026-27 NPO investment.

4.4 An indicative financial template will also be submitted as part of the application process.

4.5 The draft business plan relates not just to the ACE investment in RAMM but also to that of the City Council, representing a 'joined up' view for forward planning for this service. As such the resource implications relate to RAMM as an ECC service and also to the other ECC departments which interface with the museum as part of normal local authority operation. After many years of ACE funding, this extension year is not anticipated to bring any further additional resource requirement.

5. Section 151 Officer comments:

5.1 Applying for the extension will require the Council to commit to maintaining the Museum as a going concern over the period covered by the extension. Arts Council funding can only be used for the purposes set out in the agreement and not used, for example, to offset reductions in spending elsewhere within the RAMM's budget. This funding will therefore allow the Council to continue the activity covered by the agreement.

6. What are the legal aspects?

6.1 The Arts Council England award for the extension year 2026-27 is not subject to any reciprocal obligations on the part of Exeter City Council in relation to the Agreed Activities. The Agreed Activities are set out in the outline business plan and these activities are fully funded by the ACE grant.

6.2 The ACE grant will be subject to the standard terms and conditions for National Portfolio Organisations (set out at Appendix 2). The ACE standard terms and conditions set out a number of obligations including , for example, the requirement to apply the grant for the sole purpose of delivering the Agreed Activities as set out in the attached outline business plan and to pay back the grant if there are any breaches of the terms and conditions of the Funding Agreement.

ACE are also able to withhold and/or demand repayment of all or part of the grant where the Council, for example:

- Closes down the museum.
- '...makes any significant change to the Agreed Activity without the prior written approval of the Arts Council',
- '...does not fulfil the purpose of the grant with reasonable care, thoroughness, competence

- ‘acts in such a way that the Arts Council believes it has significantly affected the delivery of the Agreed Activity...’

7. Monitoring Officer’s comments:

7.1 This report requests approval by Members of the draft business plan and delegation of authority to apply to ACE for grant funding for the additional financial year 1 April 2026 to 31 March 2027. This is a grant which is subject to the standard terms and conditions of ACE set out above. There are no additional funding requirements imposed upon the Council save for the obligation that the museum continue as a going concern.

8. Report details:

8.1 Arts Council England (ACE) is the national development agency for the arts and cultural sector, including museums. Its 10-year strategic vision, called ‘Let’s Create’ aims to help shape a country in which the creativity of each person is valued and given a chance to flourish and where everyone has access to a remarkable range of high-quality cultural experiences.

8.2 The City Council has received ACE National Portfolio Organisation investment in RAMM (£618,363 each year) since 2018-19. This supports a wide range of activity across exhibitions, events, collections, contemporary art, community engagement, skills development, and fundraising activities. In return for this investment, ACE expects that the City Council should deliver strongly against the strategic goals of its 10-year strategy.

RAMM was awarded NPO status on the basis of a submitted business plan and completed financial template. Together these form ACE’s Agreed Activity and Funding Agreement (see T&Cs) which cover the period 2023-26 and include projections of income from ACE, City Council and earned income, plus plans for expenditure on staff, direct activity, and overheads. The nature of ACE funding means it can only be used for certain types of activity. Currently, ACE funding covers staff and costs contributing to RAMM’s audience engagement, contemporary art, public programme, design, digital, exhibitions, events, marketing, and skills development.

8.3 Changes to partners’ funding contributions towards the Agreed Activity is a matter of discussion as set out in the standard T&C’s. At all times, museums need to maintain Accreditation to be eligible for ACE funding (and this is true of all the significant funding bodies) which requires adherence to a set of standards on governance, collections development, collections care, accessibility, audience development and engagement.

8.4 The museum is currently into its second year of activity within the 2023-26 plan and performing very well against agreed outcomes, targets and KPIs. These are monitored quarterly by RAMM’s Oversight Panel and funding is dependent on achieving these targets.

8.5 ACE has decided to extend its NPO funding for an additional year (2026-27) due to the challenges that cultural organisations face in the current operating climate. In order to receive this extension year funding, the City Council must submit an application, confirming that RAMM activity will remain broadly in line with its 2023-26 activity

plan, together with an indicative budget. Currently ACE website indicates the portal will open in late September 2024 and will remain open for eight weeks.

8.6 The City Council has produced a draft 2026-27 Business Plan, based on the 2023-26 version, which can be found in Appendix 2. The plan is structured according to the ACE requirements, showing how RAMM’s activity contributes to its ‘outcomes’ and ‘investment principles’. The document also shows how the plan contributes to Exeter City Council’s corporate priorities.

The ACE outcomes which RAMM’s plans contribute to are:

- **Creative People:** everyone can develop and express creativity throughout their life
- **Cultural Communities:** villages, towns and cities thrive through a collaborative approach to culture

The ACE investment principles underpin the plan and set out how cultural organisations such as RAMM, will need to develop so they can better deliver the outcomes:

- **Ambition & Quality:** cultural organisations are ambitious and committed to improving the quality of their work
- **Inclusivity & Relevance:** England’s diversity is fully reflected in the organisations and individuals that we support and in the culture they produce.
- **Environmental Responsibility:** cultural organisations lead the way in their approach to environmental responsibility
- **Dynamism:** cultural organisations are dynamic and able to respond to the challenges of the next decade.

9. How does the decision contribute to the Council’s Corporate Plan?

9.1 The business plan shows how RAMM activity contributes to all council priorities:

Thriving heritage and culture	Exeter’s flagship cultural service. Ambitious cultural programme of exhibitions, events, and contemporary art commissions. Partnerships supporting the cultural ecosystem of the city.
Prosperous local economy	Number one visitor attraction in the city, providing excellent and accessible experience for all visitors, driving footfall to the city centre.
Building great neighbourhoods	Working in partnership with our communities to develop projects that explore shared heritage and tackle issues faced by residents. Connecting people to their local history and to one another.
Healthy and active city	Activities that nurture the wellbeing and creativity of local people, whatever their age or background.
Net zero carbon city	Working in an environmentally responsible way and championing this approach in our public programme.

10. What risks are there and how can they be reduced?

10.1 If there are any changes to the City Council's investment in RAMM and/or failure to achieve its agreed activity plan, there is a risk that ACE will remove or reduce its investment in the museum and that Exeter City Council would be required to pay back some or all of the grant. The relevant sections within the NPO Terms & Conditions are mentioned above. This risk is mitigated by maintenance of proactive communications with the ACE relationship manager.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct.
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal potential impact on people with protected characteristics as determined by the Act is identified in an Equalities Impact Assessment, included in the background papers for Member's attention.

12. Carbon Footprint (Environmental) Implications:

12.1 RAMM has a robust environmental responsibility plan and reports on its progress quarterly via an Oversight Panel and through the NPO environmental reporting platform. The 2026-27 extension year responsibility plan primarily aligns with the ambitions of the City Council. The plan focuses on training, effective low level energy efficiencies in operations, and mechanical and electrical systems. There are no current direct implications in terms of further capital or operational expenditure.

13. Are there any other options?

13.1 Reject the outline business plan for 2026-27. However, ACE requires the funded organisation to confirm that their planned activity is broadly in line with its 2023-26 activity, so the City Council would have to explain and justify any change in direction.

13.2 Refuse the request to apply for extension year funding.

Strategic Director for Place, Ian Collinson

Authors: Helen Hartstein, Julien Parsons

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:

Appendices

Appendix 1: Draft 2026-27 NPO plan

Appendix 2: Arts Council England Standard Terms & Conditions for National Portfolio Organisations

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275

Outline NPO Business Plan Extension year April 2026 to March 2027

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Introduction

This document sets out RAMM’s indicative business plan for the Arts Council England National Portfolio Organisation extension year 2026-27. It is a continuation of RAMM’s existing business plan for 2023-26.

This plan supports both the Arts Council England Let’s Create Strategy and Exeter City Council’s strategic priorities.

RAMM is an Exeter City Council service and is regarded as the cultural flagship for the city. It is regularly cited as one of Britain’s best regional museums with collections of regional, national and international importance; two of which are [Designated collections](#).

RAMM has been at the heart of the city and region's cultural life for over 150 years by enriching people's lives, forging the bonds that create community and creating a sense of place through shared experience and understanding. The museum also plays an important social and economic role in the city. It is both a vibrant public space that instils a sense of local identity and pride and drives footfall to the city centre promoting economic growth by encouraging people and businesses to come to Exeter. It promotes wellbeing by connecting people to each other and their own history and helps nurture talent, creativity, and a spirit of discovery in our children and young people.

RAMM's vision

RAMM will enhance people's quality of life. It's a place of discovery which encourages everyone to be curious. RAMM uses its local and global collections to connect people to the world and inspires them to shape a better future.

Outcomes

The ACE outcomes which RAMM's plans contribute to are:

- **Creative People:** everyone can develop and express creativity throughout their life
 - A. Supporting people at all stages of their lives to design, develop and increase their participation in high-quality creative activities
 - B. Promoting creative opportunities in the local community to people at all stages of their lives
 - C. Providing high-quality early years activities that reach families from a wider range of backgrounds
 - D. Widening and improving opportunities for children and young people to take part in creative activities inside schools
 - E. Widening and improving opportunities for children and young people to take part in creative activities outside schools
 - F. Improving teaching for creativity in schools
 - G. Supporting children and young people to develop their creative skills and potential
 - H. Developing and improving pathways towards careers in the creative industries

- **Cultural Communities:** villages, towns and cities thrive through a collaborative approach to culture:
 - I. Improving access to a full range of cultural opportunities wherever people live
 - J. Working with communities to better understand and respond to their needs and interests, resulting in increased cultural engagement and the wide range of social benefits it brings
 - K. Working collaboratively through place-based partnerships to support and involve communities in high quality culture, improve creative and cultural education for children and young people, improve health and wellbeing through creative and cultural activity, build skills and capacity in the cultural sector and grow its economic impact
 - L. Connecting people and places, including diaspora communities and nationally and internationally

RAMM's priorities

Thriving heritage and culture	Ambitious cultural programme of exhibitions, events and contemporary art commissions.
Prosperous local economy	Number one visitor attraction in city – providing excellent and accessible experience for all visitors.
Building great neighbourhoods	Working in partnership with our communities to develop projects that explore our shared heritage and tackle issues faced by residents.
Healthy and active city	Activities that nurture the wellbeing and creativity of local people, whatever their age or background.
Net zero carbon city	Working in an environmentally responsible way and championing this approach in our public programme.

Activity Plan – what we are going to do

Outcome	Activity	Description	Outputs
1. Cultural Communities I, K	Visitor Experience	Ensuring everyone in the community feels welcome and enjoys the best possible cultural experience of RAMM’s world-class collections when visiting the museum’s suite of galleries and participating in on-site activities that are meaningful and relevant to them.	<ul style="list-style-type: none"> • Free entry to permanent galleries Tues 10.30am to 5pm, Wed-Sun 10am to 5pm. • Interactive opportunities throughout permanent galleries (physical/digital). • Volunteer engagement opportunities. • Accessibility support materials (e.g. BSL videos, ear defenders, audio guides etc).
2. Cultural Communities I, J, K	Exhibitions and Events	Year-long programme of exhibitions and events using themes of environment, health and wellbeing, untold stories and sense of place. Created to appeal to visitors seeking high quality arts and heritage content.	<ul style="list-style-type: none"> • Temporary exhibitions (in-house curated and touring). • Co-created temporary displays (Café Collectors Case, Viewpoint Windows). • Event programme, many produced by diverse range of freelance creative practitioners
3. Creative People A, E, G	Digital	Curate RAMM’s online content so that it evokes a sense of inspiration, curiosity and discovery and provides opportunities for participation which complement and augment those available when visiting the museum in person.	<ul style="list-style-type: none"> • Suite of websites: main RAMM website and Collections Explorer, SW Collections Explorer (local collections aggregator portal), Time Trail (engaging online trails, games with Exeter focus). • Bloomberg Connects app • Online events, creative activities, learning materials and video content.
4. Creative People A, E, G	Contemporary art	Working with a diverse range of contemporary artists engaging with RAMM’s collections and addressing programming themes to produce new commissions and installations for display at RAMM or partner organisations.	<ul style="list-style-type: none"> • Contemporary art commissions from artists from diverse backgrounds • Exhibitions including contemporary art • Moving image works and video installations

<p>5. Creative People A, D, E, G</p>	<p>Children and young people</p>	<p>Programme of creative activities for children and young people, using RAMM's collections and core themes as inspiration. Creative workshops, school visits, online learning materials and family craft activities promoting wellbeing and creativity.</p>	<ul style="list-style-type: none"> • Creative family activities • Workshops for C&YP exploring programming themes • In-museum schools programme at RAMM • Online learning materials
<p>6. Creative People A, B, E, G, H</p>	<p>Individual creativity</p>	<p>Providing opportunities to nurture everyone's creativity through workshops, craft, inspiring artist talks for college students. Showing the work of emerging local artists and producers in partnership with local cultural organisations.</p>	<ul style="list-style-type: none"> • Workshops, exhibition visits and talks with contemporary artists for FE college. • Monthly craft sessions and wellbeing activities for adults. • Dementia-friendly activities in collaboration with care homes and hospitals.
<p>7. Creative People G, H</p>	<p>Skills development</p>	<p>Deliver an innovative skills development programme in partnership with local schools, colleges and universities. Provide opportunities for people from all backgrounds to gain experience of working in the cultural, heritage and arts sectors, aiming for representation of local population</p>	<ul style="list-style-type: none"> • Future Skills programme • Paid internships & placements targeting students from less privileged groups. • Work experience for school children • T-level industry placements. • Youth Panel. • Supported internships.
<p>8. Cultural Communities I, J, K, L</p>	<p>Community Engagement</p>	<p>Work in partnership with local neighbourhood & community groups & universities. Co-produce activities that influence the delivery of Exeter's ambitious growth plans, contributing to healthy, thriving & connected communities.</p>	<ul style="list-style-type: none"> • Quarterly community panel meetings providing input into all areas of museum activity. • Co-produced project working with community partners and creative practitioners.

Investment Principles Plan – how we are going to do it

The ACE investment principles underpin the plan and set out how RAMM will develop so it can better deliver the outcomes:

<p>Ambition & Quality</p> <ul style="list-style-type: none"> • To ensure that RAMM’s public programme fulfils the museum’s vision and mission statements to enrich the lives of people living, working or visiting Exeter by providing them with opportunities to be inspired, informed and entertained. • We will monitor our success by distilling and articulating our ambitions and drawing from them a consistent set of questions to ask the public and participants. 	<ul style="list-style-type: none"> • Research and evaluation • Impact & Insight toolkit • Quality improvement process
<p>Dynamism</p> <ul style="list-style-type: none"> • To strengthen RAMM’s commitment to a flexible business model by augmenting our strong partnership with the University of Exeter. • Continue to establish process for strategically embedding fundraising into RAMM’s workplans. Increase individual giving at all levels. • Monitor and where appropriate engage with developments and opportunities in AI, in relation to Museum Practice. • Ensure staff feel empowered to engage with new sector developments through providing training and mentoring opportunities for our teams. 	<ul style="list-style-type: none"> • Marketing and communications • Digital • Fundraising • Data and insight • Skills development • Commercial income generation • Internal comms
<p>Environmental Responsibility</p> <ul style="list-style-type: none"> • To develop and implement a decarbonisation plan contributing to ECC’s Net Zero ambitions • Inform our audiences about the ways we can all change and adapt. 	<ul style="list-style-type: none"> • Energy efficiency - working with net zero team • Environmental responsibility programming theme
<p>Inclusivity & Relevance</p> <ul style="list-style-type: none"> • Visitors, staff & volunteers are representative of our local communities. • Everyone, whatever their background, feels welcome in the museum. • Under-served communities are involved. • Staff feel safe, supported & empowered. • We work with creative practitioners from all backgrounds to enrich our work. 	<ul style="list-style-type: none"> • Accessibility • Engage with creative practitioners from diverse backgrounds • Diversity training for staff and volunteers • Equality action plan

Finance

The NPO budget has not changed from 2018 and therefore the balance between and pay and non-pay has shifted to take into account annual pay awards.

Indicative budget

	2026-27	% OF GRANT	% CHANGE FROM PREV. YR
Pay	£461,331	75%	4%
Casuals	£36,000	6%	0%
Non-Pay	£121,031	20%	-14%
Total:	£618,363	100%	0
Grant:	£618,363		

Monitoring

RAMM's performance against its NPO business plan is monitored by its Oversight Panel. This panel is chaired by the Portfolio Holder for Arts, Culture and Tourism. It consists of five Members and two external representatives, one a young person.

The detail of the 2026-27 plan will be developed and targets and KPIs agreed. It will be submitted to the Oversight Panel in April 2026 and then be monitored on a quarterly basis against these objectives and KPIs.

There will be a risk register which also forms part of the quarterly monitoring process.

RAMM has also produced electronic dashboards for visits, ticket sales, fundraising and income generation. These are monitored operationally by the relevant staff and managers.

Standard terms and conditions for National Portfolio Organisations and Investment Principles Support Organisations

These standard terms and conditions apply to all grant offers to National Portfolio Organisations and Investment Principles Support Organisations for the funding period 1 April 2023 to 31 March 2026

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1. Definitions

- 1.1. The “Organisation” means the organisation receiving the grant bound by these terms and conditions.
- 1.2. The “Arts Council” means Arts Council England and includes its employees and those acting for it.
- 1.3. The “Agreed Activity” means the activity to be carried out during the Funding Period, which has been agreed with the Arts Council and for which the Arts Council is giving the Organisation the grant as set out in the application form, the Activity and Investment Principles Plan, and budget that accompanies this Funding Agreement as Attachments and/or as varied by this Funding Agreement.
- 1.4. The “Funding Agreement”, which the Organisation has accepted, includes and incorporates these standard terms and conditions, the payment conditions as set out in the Monitoring Schedule, the Schedule 1 Additional Conditions and the grant offer letter, together with any other conditions the Arts Council has agreed with you now or in the future.
- 1.5. The “Funding Period” means the fixed term specified in the grant offer letter.
- 1.6. The “Subsidy Control rules” means the Subsidy Control rules adopted by the UK with effect from 11pm on 31 December 2020, including Part 2, Title XI (Level Playing Field), Chapter 3 (Subsidy Control) of the ‘Trade and Cooperation Agreement between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain And Northern Ireland, of the other part’ incorporated into law by the European Union (Future Relationship) Act 2020 and, where relevant, the EU State aid rules as set out in Articles 107-109 of the Treaty on the Functioning of the European Union and associated regulations and guidelines under the Northern Ireland Protocol and any other applicable laws and successor legislation. It also includes the Subsidy Control Act 2022 and any accompanying Regulations in so far as their provisions are in force at the time of entering into the Funding Agreement.
- 1.7. Where the words “including”, “include”, “in particular”, “for example” or any other similar expression are used in these terms and conditions they are illustrative and do not place a limit on the words before or after their use or create an exhaustive list.

2. The Agreed Activity

- 2.1. The Organisation will deliver the activities as defined in the Agreed Activity, which accompanies the Funding Agreement as Attachments (as may be updated from time to time). The Organisation acknowledges that the grant is paid on trust to the Organisation for the sole purpose of delivering the Agreed Activity.
- 2.2. The Agreed Activity will form part of the basis for the reporting, monitoring and assessment of performance under this Funding Agreement.
- 2.3. The Organisation will tell the Arts Council immediately in writing of anything that significantly delays, threatens or makes unlikely the successful delivery of the Agreed Activity or any key part of it. This includes any withdrawal of match funding for the Agreed Activity, which the Organisation told the Arts Council it would receive, at any time during the Funding Period.

3. Funding

- 3.1. Subject to satisfactory receipt of any information required from time to time, the Arts Council agrees to pay to the Organisation the total grant in such instalments as shown in the Monitoring Schedule.
- 3.2. The Arts Council will not make any payments under this Funding Agreement until it has evidence that the terms and conditions have been accepted by the Organisation's board or equivalent, and the Funding Agreement is properly accepted by a board member or equivalent. The Organisation will ensure that at all times, while the Funding Agreement is in force, that it is correctly constituted and regulated and that the receipt of the grant and the delivery of the Agreed Activity are within the scope of the Organisation's constitution.
- 3.3. The Organisation accepts that these standard terms and conditions are not negotiable, and the Organisation shall have no right to amend or vary the provisions of this Funding Agreement (unless with the prior written agreement of the Arts Council) which, for the avoidance of doubt, includes the Schedule 1 Additional Conditions, the Agreed Activity as specified in the accompanying Attachments, the Funding Period and the Dates and Amounts of the Scheduled Payments as specified in the Monitoring Schedule.
- 3.4. The Organisation accepts that the Arts Council will not increase the grant if the Organisation spends more than the total grant shown in the Monitoring Schedule.

- 3.5. The Organisation will show the grant and related expenditure in its annual accounts under the description of “Arts Council Funding” (as a restricted fund or unrestricted fund, deriving from grant in aid as revenue grant, or as a capital grant, or from National Lottery funds, as directed in the offer letter). If the Organisation has more than one restricted fund, it will include a note to the accounts identifying each restricted fund separately. If the Organisation has more than one grant from the Arts Council, it will record each grant separately in the notes to the accounts. The Organisation will identify unspent funds and assets, in respect of the grant, separately in its accounting records.

4. VAT

- 4.1. The grant is not a consideration for any taxable supply for VAT purposes. The Organisation acknowledges that the Arts Council’s obligation does not extend to paying any amounts in respect of VAT in addition to the grant.
- 4.2. If the Organisation is registered for VAT, or subsequently becomes liable to register for VAT, it must keep proper and up to date records and it must make those records available and give copies to the Arts Council when requested.
- 4.3. If the grant includes any or all of the VAT costs associated with the Agreed Activity and the Organisation subsequently recovers any VAT, it must pay back immediately any of the VAT that has been paid for with the grant.

5. Monitoring

- 5.1. The Arts Council will designate a Relationship Manager for the Organisation in relation to this Agreement (the “Relationship Manager”). The Relationship Manager is the main point of contact between the Arts Council and the Organisation.
- 5.2. The Relationship Manager:
- 5.1.2. will act as the main contact with the Organisation for all matters relating to the grant and the Agreed Activity
 - 5.1.3. will monitor the Organisation, ensuring it complies with the terms of this Funding Agreement and other requirements in accordance with the Arts Council’s monitoring requirements, identify issues and share these with relevant colleagues

- 5.1.4. may attend the Organisation's board meetings (or equivalent) as an observer on a regular or an occasional basis
- 5.1.5. will act as a "critical friend" to the Organisation by engaging with its activity, and questioning its self-monitoring, direction, operations and activities

6. The Organisation's Obligations

- 6.1. The Arts Council requires the Organisation to meet any special or additional conditions which may have been agreed between the Arts Council and the Organisation in writing from time to time and which will be deemed incorporated into this Funding Agreement. Any special or additional conditions are in addition to the following requirements of this Clause 6 that the Arts Council requires the Organisation to meet.
- 6.2. The Arts Council will monitor and assess the Organisation's Agreed Activity and how effectively the funding is being used. To enable this, the Organisation will send the Arts Council all such information as the Arts Council may in its sole discretion reasonably request from time to time. This includes the information, without limitation, set out in the Monitoring Schedule, and copies of all or any other relevant documentation about the financial and operational running of the Organisation, to include business plans together with monitoring reports/revisions, board papers or equivalent, reserves policies and any other information which the Arts Council deems relevant to its understanding of how the Agreed Activity is being delivered and the funding used and for reporting purposes to the Department for Digital, Culture, Media and Sport ("DCMS"). The Organisation agrees and accepts that the Arts Council may share such information and data with DCMS.
- 6.3. The Organisation must get the Arts Council's prior written agreement before making any significant changes to its legal status, transferring any assets or merging or amalgamating with any other body including a company set up by the Organisation or to the Agreed Activity.
- 6.4. The Organisation will:
 - 6.4.1. advocate for the value of publicly funded creativity and culture (both grant in aid and National Lottery funded) across its advocacy, marketing and communication activities
 - 6.4.2. where appropriate and when requested, actively work with the Arts Council and other National Lottery distributors, to champion the role of

The National Lottery in supporting your work, and creativity and culture in England

- 6.4.3. prominently feature the Arts Council's grant award logo or National Lottery grant award logo (as applicable) on all digital and print marketing assets according to our guidelines
- 6.4.4. share its images, audio and visual content with the Arts Council, having obtained all relevant consent for their use across the Arts Council communication channels
- 6.5. The Organisation consents to any publicity about the grant and the Agreed Activity as the Arts Council may from time to time require. In addition:
 - 6.5.1. The Arts Council can carry out any forms of publicity and marketing to promote the award of the grant as it sees fit and the Organisation will do whatever is reasonably required in order to assist with any form of publicity and marketing, including any digital, press or media related activities.
 - 6.5.2. The Organisation will assist the Arts Council in advocating for the impact and value of public funding of creativity and culture. The precise nature of this advocacy will depend on the scale and capacity of the Organisation and will be agreed through conversations with the Arts Council's communications team and/or the Organisation's Relationship Manager. This advocacy may include actions such as hosting meetings or including marketing materials in venues, online or in print.
 - 6.5.3. The Organisation must include the latest agreed standard boilerplate about the Arts Council and its investment for all press releases it issues, using the guidance the Arts Council will provide. The Organisation can access full details of how to acknowledge the Arts Council's support at <https://www.artscouncil.org.uk/grant-award-logo-and-guidelines>.
- 6.6. The Organisation is fully responsible for every part of its business. This includes, without limitation:
 - 6.6.1. the Organisation must ensure that all current and future members of its governing body receive a copy of this Funding Agreement and the Relationship Framework while they remain in force
 - 6.6.2. the Organisation must ensure that all current and future members of

its governing body have regular updates on the financial position of the Organisation and on the delivery of the Agreed Activity

- 6.6.3. the Organisation is responsible for getting its own management and business advice. This includes considering whether it needs to get financial, accounting, tax, solvency, legal, insurance, human resources, Subsidy Control rules, or other types of professional advice
- 6.6.4. the Organisation must tell the Arts Council immediately of any changes in the Organisation that may threaten its solvency and inform the Arts Council if it is proposing to enter into any arrangement with any of its creditors
- 6.6.5. the Organisation must tell the Arts Council in writing as soon as possible if any legal claims or any regulatory investigations are made or threatened against it and/or which would adversely affect the Agreed Activity during the period of the grant (including any claims made against members of its governing body or staff)
- 6.6.6. In carrying out its business and funded activity under the Agreed Activity the Organisation must obtain all approvals, consents and licences required by law to deliver the Agreed Activity, comply with any relevant laws or government requirements and comply with best practice in governance, reporting and operation. This includes:
 - 6.6.6.1. taking all reasonable steps to ensure the safety of the children and adults at risk that it will work with. The Organisation will follow best practice in having appropriate policies and procedures in place to ensure the protection of children, young people and vulnerable adults and in complying with those procedures, which will include procedures to check backgrounds and disclosures of all employees, volunteers, trustees, partners or contractors who will supervise, care for, or otherwise have significant direct contact with children and adults at risk with the Disclosure and Barring Service ("DBS"). For further details of the DBS see <https://www.gov.uk/government/organisations/disclosure-and-barring-service>
 - 6.6.6.2. following best practice in having appropriate and effective policies and procedures in place concerning equality and

diversity, harassment and bullying, and in complying with those policies and procedures

- 6.6.6.3. having in place at all times and acting in accordance with appropriate and effective disciplinary, grievance and whistleblowing policies
- 6.6.6.4. having an equal opportunities policy in place at all times and act at all times without distinction and in compliance with all relevant equality legislation
- 6.6.6.5. where appropriate for the Organisation's business, having a public facing complaints policy in place at all times
- 6.6.6.6. following best practice in having appropriate and effective policies and procedures in place concerning counter fraud
- 6.6.6.7. at all times complying with Data Protection Legislation. Data Protection Legislation shall mean without limitation (i) the United Kingdom General Data Protection Regulation and (ii) the Data Protection Act 2018 together with all other applicable UK laws whether currently existing, yet to be implemented, or to act as successor legislation, that regulate the collection, processing and privacy of personal data
- 6.6.6.8. adhering to all relevant legal obligations relating to offering apprenticeships and internships
- 6.6.6.9. ensuring that salaries, fees and subsistence arrangements are as good as or better than those agreed by any relevant trade unions and employers' associations
- 6.6.6.10. maintaining all main financial records including profit and loss accounts, management statements, personnel and payroll records for staff funded under this Funding Agreement for seven years after the grant has ended. The Organisation will complete all statutory returns for employees and make all relevant payments to cover their pensions and salary deductions, such as Income Tax and National Insurance contributions
- 6.6.6.11. when procuring goods, works or services that are funded in whole or in part by the Funding Agreement you must:

- 6.6.6.11.1. comply with your obligations under the Public Contracts Regulations 2015 (as amended or replaced from time to time) (“PCR”), if you are a contracting authority subject to the PCR;
 - 6.6.6.11.2. for contracts within the scope of Regulation 13 of the PCR, procure in a manner compliant with the PCR (or such other procurement laws as may apply from time to time); and
 - 6.6.6.11.3. for all other contracts, procuring in a manner which ensures that suppliers are treated equally, without discrimination and that any procurement process is conducted in a transparent and proportionate manner.
- 6.6.6.12. complying with all anti-bribery and anti-corruption legislation
 - 6.6.6.13. considering any possible risks involved in its funded activities and taking appropriate action to protect everyone involved and maintaining adequate and appropriate insurance at all times
 - 6.6.6.14. maintaining adequate insurance at all times and if asked, will supply copies of the insurance policy. This includes employee and public liability insurance and insurance that covers the full replacement value of any assets that the Organisation has funded
 - 6.6.6.15. if applicable to your Organisation, complying with the Modern Slavery Act 2015 and any other slavery, servitude and forced or compulsory labour and human trafficking legislation
 - 6.6.6.16. ensuring that the Organisation does not work with organisations proscribed under the Terrorism Act 2000 [gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version](https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version)
- 6.7. The Organisation accepts that the Arts Council’s staff, council members and advisers cannot give the Organisation professional advice and will not take part in carrying out the Organisation’s business. The Arts Council cannot be held responsible for any action the Organisation takes, or fails to take, or for

the Organisation's debts or liabilities. The Arts Council will not be liable for any losses or charges if it does not make any grant payment on the agreed date. The Arts Council will not be responsible to anyone else who may take, or threaten to take, proceedings against the Organisation.

- 6.8. The Organisation will not sell, give away, licence or borrow against any grant funded assets (including any intellectual property rights) without receiving the Arts Council's prior written consent. As the grant has come from public funds, the Organisation understands and accepts that if the Arts Council provides the consent it may require that the disposal is at full market value and/or subject to conditions requiring the Organisation to repay all or part of the grant money received.
- 6.9. The Organisation must give the Arts Council, the National Audit Office or any of their agents access to meetings, events and any/all financial records, other information and/or premises, as may be reasonably requested, relating to the Agreed Activity, the Organisation or to any other matter arising under this Funding Agreement and the Arts Council may postpone payment of the grant or an instalment of the grant until the Arts Council has received the material it has requested.
- 6.10. The Organisation must, subject to the provisions as noted in Clause 6.6.6.7. above, provide to the Arts Council or a third party appointed by the Arts Council such audience/participant, staffing, activities including touring, income and expenditure data as the Arts Council may request. Where relevant, the Organisation must ensure that it has obtained all relevant and appropriate consents in accordance with the Data Protection Legislation prior to providing such data to the Arts Council or such appointed third party. The Arts Council may postpone payment of the grant or an instalment of the grant until the Arts Council has received the material it has requested.
- 6.11. The Organisation must ensure it updates its Grantium Applicant profile regularly (to ensure key details such as governance status, address and main contacts are up to date). The Organisation should contact the Arts Council if they wish to change their bank or building society details into which grant(s) are paid.
- 6.12. Any information the Arts Council receives from the Organisation will be subject to the Freedom of Information Act 2000 ("FOIA"). By law, the Arts Council may have to provide the Organisation's information to a member of the public if they ask for it under FOIA. For further details, see the Arts Council's information sheet *How we treat your application under the Freedom of Information Act*, available on the Arts Council's website

<http://www.artscouncil.org.uk/>. If the Organisation has any concerns, the Organisation should let the Arts Council know as some information may be covered by exemptions under FOIA if for example the information is sensitive or confidential, but any decision to release information under FOIA is at the Arts Council's absolute discretion.

- 6.13. The Organisation must inform the Arts Council of any recruitment process for board members/trustees and/or senior staff. The Arts Council reserves the right to be consulted in the process of recruitment and invited to attend interviews when the Organisation is recruiting board members/trustees and/or senior staff.
- 6.14. The Organisation understands that the Arts Council can only guarantee future instalments of the grant as long as funds from the Government and/or the National Lottery are available to it. It is possible that the indicative amount may therefore be reduced for future instalments.
- 6.15. The Organisation acknowledges that the grant comes from public funds and acknowledges that the support provided must be compliant with the Subsidy Control rules. Where applicable, the Organisation agrees that Arts Council will publish information relating to the grant and that the Organisation will keep reasonably detailed records to demonstrate compliance with the Subsidy Control rules and shall provide a copy of such records to us upon reasonable request. In the event that it is deemed by a competent court or other regulatory authority to be non-compliant with the Subsidy Control rules, the Organisation will repay the entire grant (and any other sums due) immediately.
- 6.16. The Organisation will not transfer any part of the grant or this Funding Agreement or any rights under it to any other organisation or individual without the prior written agreement of the Arts Council. If the Organisation is required by the Arts Council to enter into a partnership agreement with another organisation or organisations in order to deliver the Agreed Activity, the Organisation will submit the proposed Partnership Agreement to the Arts Council for its prior authorisation and subject thereto will ensure that no other organisation or individual acquires any third party rights under this Funding Agreement.
- 6.17. The Arts Council may impose additional terms and conditions on the grant either in the Offer Letter and/or if the Organisation is at any time in breach of this Funding Agreement and/or if the Arts Council believes it is necessary to make sure that the Agreed Activity is delivered as agreed between the Organisation and the Arts Council and/or the Arts Council

has reasonable grounds to believe it is necessary to protect public money and/ or it is required to do so by Government either through a direction or by the issuing of or amendment of grant standard requirements.

7. Termination of this Agreement

- 7.1. If the Organisation breaches any of the terms and conditions of this Funding Agreement, then the Arts Council in its absolute discretion may withhold or demand repayment of all or part of the grant and terminate the Funding Agreement. The Organisation will repay any grant requested immediately upon demand.
- 7.2. The Arts Council may suspend payment of the grant if it wishes to investigate any matters concerning the grant (or any other grants given by the Arts Council to the Organisation). The Organisation understands and accepts that the Arts Council will accept no liability for any consequences, whether direct or indirect, that may arise from a suspension even if the investigation finds no cause for concern.
- 7.3. The Arts Council may also withhold and/or demand repayment of all or part of the grant if the Organisation:
 - 7.3.1. closes down its business (unless, with the Arts Council's prior written consent, it joins with, or is replaced by, another Organisation that can take over this Funding Agreement and carry out the purposes of the grant to the Arts Council's satisfaction)
 - 7.3.2. makes any significant change to the Agreed Activity without the prior written approval of the Arts Council
 - 7.3.3. does not fulfil the purpose of the grant with reasonable care, thoroughness, competence and to a standard that the Arts Council expects from the Organisation with its level of experience in its practice, profession or line of work
 - 7.3.4. provides any information to the Arts Council that is wrong or misleading, either by mistake or because it is trying to mislead the Arts Council during the application process or during the period of this Funding Agreement
 - 7.3.5. becomes insolvent, or any order is made, or resolution is passed, for it to go into administration, be wound up or dissolved; or if an

administrator or other receiver, manager, liquidator, trustee or similar officer is appointed over all or a considerable amount of the Organisation's assets; or the Organisation enters into or proposes any arrangement with its creditors

7.3.6. acts illegally or negligently at any time

7.3.7. acts in such a way that the Arts Council believes it has significantly affected the delivery of the Agreed Activity, or is likely to harm the Arts Council's or the Organisation's reputation or it is in the Arts Council's discretion necessary to protect public money; and/or

7.3.8. sells or in some other way transfers any part of the grant, the business or the activity funded under the Agreed Activity to someone else without the Arts Council's prior written approval

7.3.9. works with any prohibited organisation proscribed under the Terrorism Act 2000 as set out in Clause 6.6.6.16.

7.4. If the Organisation is in breach of any of the terms of this Funding Agreement and the Arts Council does not enforce one or more of its rights straight away, this does not mean that it will not do so in the future. The Arts Council will give up its right to enforce this Funding Agreement only if it tells the Organisation in writing.

7.5. If the Organisation has other revenue or capital grants with the Arts Council, then it is also under an obligation to keep to the terms and conditions of those Funding Agreements. If there is any conflict between those terms and conditions and the terms and conditions of this Funding Agreement, then these terms and conditions will take precedence so far as they relate directly to the delivery of this Agreed Activity.

7.6. If the Organisation breaches any of the terms of this Funding Agreement, the Arts Council can choose to treat that as the Organisation breaching the terms of any other grant agreements the Arts Council has with the Organisation. This will allow the Arts Council to take the same actions under those agreements that the Arts Council may take under this Funding Agreement, including making the Organisation pay back the grant and stopping any future payments.

7.7. This Funding Agreement and these terms and conditions remain in force for whichever period is the longest time:

7.7.1. for one year following the payment of the last instalment of grant

- 7.7.2. as long as any part of the grant remains unspent
- 7.7.3. the expiry of the maximum period required under the grant for asset monitoring; or
- 7.7.4. as long as the Organisation does not carry out any of the terms and conditions of this Funding Agreement or any breach of them continues (this includes any outstanding reporting on grant expenditure or the delivery of the Agreed Activity)

8. Additional Terms and Conditions

- 8.1. The Arts Council has the right to impose additional terms and conditions on the grant if:
 - 8.1.1. the Organisation is in breach of the Funding Agreement
 - 8.1.2. the Arts Council or another funder withdraws any part of the funding for the Agreed Activity
 - 8.1.3. the Arts Council has reasonable grounds to believe that the Agreed Activities are being carried out by the Organisation in a way that may have a detrimental effect on the Agreed Activities, or on the Arts Council's role as a distributor of public money. For the avoidance of doubt, this would apply to the manner and speed of the delivery of the Agreed Activities, or to any illegal or negligent actions by the Organisation, and not to any artistic decision made by the Organisation
 - 8.1.4. the Arts Council has reasonable grounds to believe that it is necessary to protect public money; and/or
 - 8.1.5. the Arts Council believes such conditions are necessary or desirable to make sure that the Agreed Activity is delivered as set out in the application form or following any agreed changes

Equality Impact Assessment: *RAMM NPO business plan for extension year*

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive Committee: 1 Oct 2024 Council: 15 Oct 2024	RAMM NPO business plan for extension year	2.1 That Executive recommend to Council to:- 1. endorse the Royal Albert Memorial Museum & Art Gallery (RAMM) Business Plan;	Race and ethnicity Disability Sex/Gender Gender reassignment Religion and belief Sexual orientation Age

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		2. To grant delegated authority to the Strategic Director for Place, in consultation with the Portfolio Holder for Arts, Culture & Tourism, to apply to Arts Council England for the additional year's funding (2026-27); and 3. authorise the Council to enter into the 2026-27 funding agreement with Arts Council England, should the application for funding be successful.	

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Positive		<p>The museum will be working with communities to better understand and respond to their needs and interests.</p> <p>The museum has developed an inclusivity and relevance plan aimed at ensuring that:</p> <ul style="list-style-type: none"> • Visitors, staff & volunteers are representative of our local communities. • Everyone, whatever their background, feels welcome in the museum. • Under-served communities are involved. • Staff feel safe, supported & empowered. • We work with artists and creative practitioners from all backgrounds to enrich our work.
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Positive		<p>As above</p> <p>In addition:</p> <ul style="list-style-type: none"> • RAMM will continue its accessibility work to make the museum as welcoming as possible for d/Deaf and disabled people.
Sex/Gender	Positive		As above
Gender reassignment	Positive		As above
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Positive		As above
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Positive		As above

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<p>Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).</p>	<p>Positive</p>		<p>As above</p> <p>RAMM's business plan contains: A programme of creative activities for children and young people, using RAMM's collections and core themes as inspiration. These include creative workshops, school visits, home education visits and activities, online learning materials and family craft activities promoting wellbeing and creativity.</p> <p>RAMM will deliver an innovative skills development programme in partnership with local schools, colleges and universities. It will provide opportunities for people from all backgrounds to gain experience of working in the cultural, heritage and arts sectors, aiming for representation of local population</p> <p>Older people: RAMM will provide opportunities to nurture everyone's creativity through workshops, craft, object handling, wellbeing activities, dementia and age friendly activities etc.</p>
<p>Pregnancy and maternity including new and breast feeding mothers</p>	<p>Neutral</p>		<p>As above</p>
<p>Marriage and civil partnership status</p>	<p>Neutral</p>		

Actions identified that will mitigate any negative impacts and/or promote inclusion

-

Officer: Helen Hartstein, Julien Parsons, Alison Hopper Bishop, Joseph Harvey

Date: 22 Aug 2024

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Joint Interim Director – Environment, Waste and Operations

Title: Air Quality Annual Status Report

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To present the statutory Annual Status report that has been submitted to the Department of Environment, Food and Rural Affairs (DEFRA). This contains the monitoring data from 2023, a summary of the actions taken in that year to improve local air quality and future plans.

2. Recommendations:

2.1 That Executive Committee notes the statutory annual status report.

2.2 That Council notes the statutory annual status report.

2.3 That an update be provided to Executive should the clarification from Department for Food and Rural Affairs (DEFRA) over the timetable for future actions by the City Council be different than that outlined in this report.

3. Reasons for the recommendation:

3.1 Action on local air quality is a legal duty placed upon the Council (and all district and county councils) by Part IV of the Environment Act 1995. Safeguarding air quality will help reduce any detrimental effects from air pollution on the health and wellbeing of Exeter's population. We are required under this legislation to submit an Annual Status Report to DEFRA using their template and to present the report to members at a local level.

4. What are the resource implications including non financial resources?

4.1 The City Council will continue to monitor air pollution and report on levels. This will take place within existing resources. In the coming years, the Air Quality Management Area (AQMA) boundary will need to be reviewed in line with government statutory guidance and a new Air Quality Action Plan (AQAP) produced.

5. Section 151 Officer comments:

5.1 There are no additional financial implications for Council to consider.

6. What are the legal aspects?

6.1 Part IV of the Environment Act 1995 (as amended by the Environment Act 2021) sets out statutory provisions on air quality. Section 82 provides that local authorities shall review the air quality within their area. Section 83 requires local authorities to designate Air Quality Management Areas (AQMAs) where air quality objectives are not being achieved or are not likely to be achieved (i.e. where pollution levels exceed the air quality objectives) as set out in the Air Quality (England) Regulations 2000. Where an area has been designated as an AQMA, Section 84 requires local authorities to develop an Air Quality Action Plan (AQAP) setting out the remedial measures required to achieve the air quality standards for the area covered within the AQMA.

6.2 The Department for Environment, Food and Rural Affairs (DEFRA) has provided statutory guidance in the form of the Local Air Quality Management Policy Guidance (PG16). The guidance gives particular focus to so-called 'priority pollutants' such as Nitrogen Dioxide (NO₂) and so-called 'Particulate Matter' (PM10 and PM2.5) which are relevant to both district and county councils. Local Authorities are required to submit an Annual Status Report (ASR) to the Department for Environment, Food and Rural Affairs in order to report the progress being made in achieving reductions in concentrations of emissions relating to relevant pollutants below air quality objective levels. The completed report is submitted to the Secretary of State (DEFRA) for consideration. DEFRA provide comments back to the Local Authority which the Authority must 'have regard to'.

7. Monitoring Officer's comments:

7.1 The purpose of this report is to provide members with an update on the air quality of its area. Members will note the content of the report together with the attached 2024 Air Quality Annual Status Report and DEFRA appraisal.

8. Report details:

8.1 There are two national objectives for levels of nitrogen dioxide. These are for the average level over a whole year, which should be below 40 µg/m³, and the average level for one hour, which should not exceed 200 µg/m³ on more than 18 occasions during a year. Local authorities are told that this one hour standard is unlikely to be exceeded where the average level over a whole year is below 60 µg/m³ so this measurement is a commonly used proxy. The annual average objective applies to residential, hospital and education sites. The hourly average objective applies to these sites and to busy streets and workplaces as well.

8.2 Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the objectives apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the city. The results of the monitoring conducted by the City Council is not representative of typical or average conditions across the city. Instead most of the monitoring sites are indicative of the worst case locations.

8.3 The number of sites which exceed the objective has reduced significantly since the AQMA was declared (a reduction from 32 exceedences in 2009 to one in 2021, 2022 and 2023). The highest levels are measured on the Heavitree corridor, at East Wonford Hill. Here levels have previously been close to or above the levels which indicates an exceedance of the hourly objective but in since 2019 have been significantly lower (at 38.2 $\mu\text{g}/\text{m}^3$ in 2020, 42.2 in 2021, 40.4 in 2022 and 40.5 in 2023).

8.4 The measured results can be found in table A.3 of the Annual Status Report (appendix 1). Trends in annual nitrogen dioxide concentrations can also be seen in Figure A.1. These show that in 2020 levels of nitrogen dioxide at every site, including East Wonford Hill fell to below the objective levels. This significant fall was caused by a reduction in traffic flows as a result of COVID-19. There was a rebound in 2021, but not back to pre-pandemic levels. A further fall was seen from 2021 to 2022, back to close to 2020 (lockdown) levels. Levels in 2023 were very similar to 2022.

8.5 This pattern is partially explained by traffic flows, which fell dramatically in 2020 and rebounded partially in 2021. They increased again to 2023 (Table 3.1 in the Annual Status Report contains data from Devon County Council) but still not back to pre-pandemic levels. It is not possible to say whether traffic flows will eventually return to pre-pandemic levels and if they do whether this will be matched by a full return in air pollution levels as well. At the same time as the changes caused by Covid, there will also have been changes in the vehicle fleet which should have reduced emissions from newer vehicles. Additional variability is also introduced by weather and other factors that affect pollution concentrations on a year-to-year basis. These factors will continue to be evaluated in future reports, looking at the data from 2024 and beyond.

8.6 The report covers part of the period during which Devon County Council introduced temporary changes to prohibit through traffic in the Heavitree area. This is discussed in section 3.2.1 of the report, which concludes that no impact from the changes can be seen in the 2023 data set for the monitoring sites that could be expected to have been affected, although the changes were only in place for September to December of 2023.

8.7 No sites had levels in 2023 between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. close to but not above the objective level of 40). Most locations along the busy routes into and around the city had concentrations of nitrogen dioxide in the range between 25 and 35 $\mu\text{g}/\text{m}^3$ during last year.

8.8 As you move away from busy roads, levels in previous years have fallen below 25 $\mu\text{g}/\text{m}^3$. In 2023, levels in these areas were typically between 10 and 15 $\mu\text{g}/\text{m}^3$ for purely suburban streets and between 15 and 20 $\mu\text{g}/\text{m}^3$ for local through routes. The majority of the population of Exeter therefore live in locations with concentrations of nitrogen dioxide well below the objective, but a small number are exposed at home to levels above the objective. No schools in Exeter experience levels above the objective.

8.9 NO_2 levels in Exeter have at most sites have fallen since a peak in 2009 then were broadly stable in the four years prior to 2020. 2020 was exceptional, in terms of the reduction in traffic flows during some parts of the year but it is likely that trends in travel habits, homeworking etc will continue to evolve. Trends in air quality generally take several years to emerge even when other factors are stable, because of the annual

variability caused by weather. What the long term, post-covid trends will be remains to be seen. As trends do appear, these will be reported in future Annual Status Reports.

8.10 The Annual Status Report also summarises the results of particulate pollution measurements (PM₁₀ and PM_{2.5}). No areas in the city are thought to exceed the objectives for this type of air pollution. It should also be noted that local authorities do not have legal duties to achieve the objectives for PM_{2.5}. This responsibility sits with national government in recognition of the fact that the sources of this type of pollution are much less local and may therefore be mainly beyond the local control.

8.11 The annual average EU limit value for PM_{2.5} is 25 µg/m³ and there is no suggestion that this level is being exceeded in Exeter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of 10 µg/m³ as an annual mean, to be achieved by 2040. Currently it seems likely that large parts of Exeter meet this level (based on national modelling) but areas close to specific sources may not. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

8.12 The annual status report also summarises the measures that the City Council has taken in the last year to reduce pollution levels, and the actions that will be implemented in the coming year (table 2.2 of the Annual Status Report).

8.13 The Council was awarded grant funding from DEFRA in 2023 for a project that aims to provide further information on pollution levels in the Heavitree corridor area, using machine learning, and to disseminate that information to the local community. This work is progressing according to the project plan, with the public dissemination phases commencing in 2024.

8.14 The Annual Status report concludes that previous exceedences of the nitrogen dioxide (NO₂) objective at the Blackboy Road / Pinhoe Road junction have been permanently resolved given that they had fallen below 40 µg/m³ in 2018 and therefore have been below the objective for more than 5 years. Other sites (Alphington Street, Livery Dole, Statutory Mount, Fore Street Heavitree inbound and Honiton Road) were above the objective in 2019 but have not been since. This means that there have now been four years of results at these sites which are below the objective level although two of these were affected by Covid and lockdowns.

8.15 The Annual Status Report therefore proposed that the Council follow the approach in the statutory guidance to amend the AQMA order and reduce the boundary to just the area of exceedence on East Wonford Hill. This would co-incide with the expiry of the current AQAP at the end of 2024, with the subsequent publication of a new AQAP focussing on the new AQMA. The proposed timetable for this process was as follows.

Date	Actions
June 2024	Submit ASR, announcing need for amendment of AQMA (with proposed new boundary) as well as timetable for consultation and publication of new AQAP
From June 2024	Start of process to consider AQAP measures
September committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQMA order
11 weeks after committee	Consultation closes, and draft AQMA order submitted to DEFRA
From January 2025	Evaluation of potential AQAP measures
By end March 2025	New AQMA order signed and 18 month deadline for AQAP issue starts
June 2025	Submit ASR with update on progress and timetable
From June 2025	Draft AQAP
September 2025 committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQAP
8 to 12 weeks after committee	End of consultation (exact date TBC)
By end March 2026	Consideration of consultation responses and final AQAP produced
	AQAP sent to DEFRA for approval
June 2026	Submit ASR
September 2026 committee (date TBC)	ASR presented to committee for approval and adoption of AQAP

8.16 This approach was proposed following the DEFRA appraisal of the previous year's Annual Status Report, which made it clear that an AQAP which covered a greater area than the area of exceedance was not recommended. In addition, the timetable above was provided to the DEFRA Air Quality helpdesk. Their response was 'The timetable appears to be reasonable. Please ensure this is communicated in your next ASR, so this can be considered during the appraisal process'. It was therefore anticipated that this part of the Annual Status Report, and the timetable would be acceptable to DEFRA when they reviewed the report. The Annual Status Report describes the proposed, smaller AQMA boundary, as well as including a consultation plan and equalities impact assessment for making the necessary changes to the AQMA order (Appendix F of the Annual Status Report).

8.17 The DEFRA appraisal of the Annual Status report is included with this report to Executive and Full Council (appendix B). As can be seen, it says that ‘the conclusions reached in the report are **accepted** for all sources and pollutants.’ However it also says ‘We advise ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA. The current Air Quality Action Plan (AQAP) is due to expire at the end of 2024, but ECC do plan on publishing a new AQAP which focuses on the amended AQMA’. This appears to contradict the appraisal of the previous Annual Status Report as well as the previous approval of the proposed timetable of action. It would mean that publication of the new AQAP would be delayed until September 2027 (ie according to the timetable described above but delayed for one year while further monitoring data is obtained).

8.18 DEFRA were asked for clarification of this, as well as an explanation of the other matters raised in items 4 and 6 of their commentary on 05 August 2024. They have not yet responded despite it being explained to them that a committee report on the matter was pending.

8.19 Given the requirement from DEFRA to collate another year’s worth of data before reviewing the Air Quality Management Area, it is prudent for the Council to continue with its current Action Plan for a further 12 months and for a revised timetable to be submitted as part of next years Annual Status Report.

9. How does the decision contribute to the Council’s Corporate Plan?

9.1 Successful implementation of measures to improve local air quality will contribute towards all of the Council’s Strategic programmes (promoting active and healthy lifestyles, building great neighbourhoods and net zero). The collection of reliable air quality data is a vital part of this process, so that the Council and others can understand the scale, location and trends in pollution objective exceedences.

10. What risks are there and how can they be reduced?

10.1 This report is for the information of the Committee only and there are no risks associated with the recommendation to note the contents of the Annual Status Report. There would be risks in continuing with the previously proposed timetable, given the DEFRA appraisal report, which is why it has been decided to wait until further monitoring data has been collected before amending the AQMA boundary or replacing the AQAP.

10.2 There are also risks in the implementation of measures to improve air quality, such as funding. This is acknowledged within the Annual Status Report. Any necessary alterations to Action Plans can be made by means of future Annual Status Reports.

11. Equality Act 2010 (The Act)

11.1 Under the Act’s Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people’s needs; and

- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 An equalities assessment is included within the Annual Status Report at Appendix F.

12. Carbon Footprint (Environmental) Implications:

12.1 Measures to improve local air quality will also reduce carbon emissions from transport (although the opposite is not always true). The recommendations of this report therefore align with and support the Council's carbon reduction target (carbon neutral by 2030).

13. Are there any other options?

13.1 Completing an Annual Status Report and submitting it to DEFRA is a legal duty.

Joint Interim Director – Environment, Waste and Operations , Simon Lane

Author: Simon Lane, Head of Environment and Waste and Alex Bulleid, Senior Environmental Technical Officer.

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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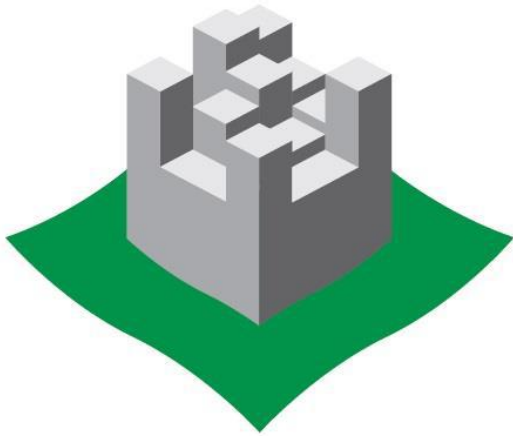
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Exeter
City Council

2024 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the Environment Act 1995
Local Air Quality Management, as amended by the
Environment Act 2021

Date: June, 2024

Information	Exeter City Council Details
Local Authority Officer	Alex Bulleid
Department	Environmental Health & Community Safety
Address	Civic Centre, Paris Street, Exeter, EX1 1 RQ
Telephone	01392 265147
E-mail	Environmental.Health@exeter.gov.uk
Report Reference Number	ASR 2023
Date	June 2024

Executive Summary: Air Quality in Our Area

Air Quality in Exeter

Breathing in polluted air affects our health and costs the NHS and our society billions of pounds each year. Air pollution is recognised as a contributing factor in the onset of heart disease and cancer and can cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in hospital admissions and mortality. In the UK, it is estimated that the reduction in healthy life expectancy caused by air pollution is equivalent to 29,000 to 43,000 deaths a year¹.

Air pollution particularly affects the most vulnerable in society, children, the elderly, and those with existing heart and lung conditions. Additionally, people living in less affluent areas are most exposed to dangerous levels of air pollution².

Table ES 1 provides a brief explanation of the key pollutants relevant to Local Air Quality Management and the kind of activities they might arise from.

Table ES 1 - Description of Key Pollutants

Pollutant	Description
Nitrogen Dioxide (NO ₂)	Nitrogen dioxide is a gas which is generally emitted from high-temperature combustion processes such as road transport or energy generation.
Sulphur Dioxide (SO ₂)	Sulphur dioxide (SO ₂) is a corrosive gas which is predominantly produced from the combustion of coal or crude oil.
Particulate Matter (PM ₁₀ and PM _{2.5})	<p>Particulate matter is everything in the air that is not a gas.</p> <p>Particles can come from natural sources such as pollen, as well as human made sources such as smoke from fires, emissions from industry and dust from tyres and brakes.</p> <p>PM₁₀ refers to particles under 10 micrometres. Fine particulate matter or PM_{2.5} are particles under 2.5 micrometres.</p>

¹ UK Health Security Agency. Chemical Hazards and Poisons Report, Issue 28, 2022.

² Defra. Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

Exeter's Air Quality Management Area (AQMA) was declared in 2011 because levels of nitrogen dioxide exceeded both the annual average and the short-term objectives for that pollutant. A map of the area can be found in Appendix D. The Air Quality Action Plan (AQAP) contains measures to reduce pollution levels in the AQMA. The current AQAP covers the period 2019-2024. It was published following a significant consultation and engagement process which reached nearly 3000 people. The plan is available online at [this link](#).

Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the objectives apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the city. The results of the monitoring conducted by the City Council is not generally representative of typical or average conditions across the city. Instead it is indicative of the worst case locations.

Prior to 2020 the annual average objective was regularly exceeded at a number of places in the city. These were at Alphington Street and along the Heavitree corridor into the city. The highest levels measured have typically been on the Heavitree corridor, at East Wonford Hill. Here levels historically were close to or above the level which indicates an exceedance of the hourly objective.

The measured results for 2023 can be found in Table A.3 of this report. Trends in annual nitrogen dioxide concentrations can also be seen in Figure A.1. These show that in 2023 levels of nitrogen dioxide were below the objective at every site except East Wonford Hill. The significant fall seen in 2020 as a result of a reduction in traffic flows during COVID-19 rebounded in 2021 but not back to pre-pandemic levels. There was then a further fall in concentrations seen at most sites in 2022, with concentrations roughly stable since then. The improvement since 2019 is likely to have been caused by a combination of traffic flows still being slightly below those seen before Covid, the ongoing improvement in vehicle emissions technologies and measures taken by the City Council and partners to implement the Air Quality Action Plan.

No sites had levels in 2023 between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. close to but not above the objective level of 40). Most locations along the busy routes into and around the city had concentrations of nitrogen dioxide in the range between 25 and 35 $\mu\text{g}/\text{m}^3$ during last year. As you move away from busy roads, levels fall below 25 $\mu\text{g}/\text{m}^3$. In 2023, levels in these areas were typically between 10 and 15 $\mu\text{g}/\text{m}^3$ for purely suburban streets and between 15

and $20 \mu\text{g}/\text{m}^3$ for local through routes. The majority of the population of Exeter therefore live in locations with concentrations of nitrogen dioxide well below the objective, but a very small number are still exposed to levels above the objective outside their homes. No schools in Exeter experience levels above the objective.

In September 2023 temporary changes were made to prohibit through traffic in the Heavitree residential area. In June 2024 the HaTOC committee voted to end the trial scheme. This only affected part of the 2023 monitoring year reported so any changes in traffic flows or nitrogen dioxide levels as a result would not be as significant as if the change had co-incided with the calendar year. There will also be other factors which affect pollution levels on a year-to-year basis, so identifying the impact of the highway changes will never be straightforward. Figure 3.1 shows 2023 concentrations plotted against those from 2022. This is not a formal assessment of the temporary scheme, but it suggests that no impact of the highway changes can be seen in the 2023 data set for the monitoring sites that could be expected to have been impacted. This will be reported on further in the next Annual Status Report in 2025.

The data shows that no locations measured an exceedence of the proxy for the hourly nitrogen dioxide objective in 2023 (an annual average of $60\mu\text{g}/\text{m}^3$).

2020 was exceptional, in terms of the change in traffic flows, so the Council had no plans to amend the AQMA as a result of the changes to NO_2 concentrations seen in that year. The last Annual Status Report (published in 2023) also recommended that longer term trends were monitored to confirm which exceedences have indeed been permanently resolved. There will also always be natural variation between years as a result of local small changes in traffic flows (road works etc) and weather patterns. This makes identifying any trend difficult over short periods of time even where other factors are stable. For this reason, DEFRA recommend that three years of data are used to confirm that an exceedence of the objective has indeed been resolved.

It seems highly likely that previous exceedences at the Blackboy Road / Pinhoe Road junction (DT42 and DT43) have been permanently resolved given that they had fallen below $40 \mu\text{g}/\text{m}^3$ in 2018 and therefore have been below the objective for more than 5 years. Other sites (Alphington Street DT19, Livery Dole DT52, Satutory Mount DT54, Fore Street Heavitree inbound DT56 and Honiton Road DT58) were above the objective in 2019 but have not been since. This means that there have now been four years of results at these sites which are below the objective level although two of these were affected by Covid and lockdowns.

The Council therefore intends to follow the approach in the statutory guidance and amend the AQMA order to reduce the AQMA to just the area of exceedance on East Wonford Hill. This would co-incide with the expiry of the current AQAP at the end of 2024, with the subsequent publication of a new AQAP focussing on the new AQMA. The proposed timetable for this process is as follows:

Date	Actions
June 2024	Submit ASR, announcing need for amendment of AQMA (with proposed new boundary) as well as timetable for consultation and publication of new AQAP
From June 2024	Start of process to consider AQAP measures
September committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQMA order
11 weeks after committee	Consultation closes, and draft AQMA order submitted to DEFRA
From January 2025	Evaluation of potential AQAP measures
By end March 2025	New AQMA order signed and 18 month deadline for AQAP issue starts
June 2025	Submit ASR with update on progress and timetable
From June 2025	Draft AQAP
September 2025 committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQAP
8 to 12 weeks after committee	End of consultation (exact date TBC)
By end March 2026	Consideration of consultation responses and final AQAP produced
	AQAP sent to DEFRA for approval
June 2026	Submit ASR
September 2026 committee (date TBC)	ASR presented to committee for approval and adoption of AQAP

This timetable was provided to the LAQM helpdesk on 26 September 2023. Their response was ‘The timetable appears to be reasonable. Please ensure this is communicated in your next ASR, so this can be considered during the appraisal process’.

Whilst it would be desirable to publish a new AQAP immediately after the expiry of the old plan at the end of 2024 this is not possible with the timetable above. The need to first review the AQMA boundary forces the production of the new AQAP to be delayed. The AQMA boundary can only be reviewed this year because there is only now at least three years of data showing that many of the former areas of exceedance have been resolved. Once the new AQMA order has been signed work can formally begin on the new AQAP. However it is anticipated that officers will start to discuss the new plan before this. Full

public consultation will be undertaken as part of the production of the plan, so those affected will have the opportunity to comment on it.

The proposed new AQMA boundary and an explanation of how this has been derived is included in Appendix F.

In the interim period between the expiry of the current plan and the publication of a new plan, Exeter City Council will continue to implement measures, with partners such as the Devon County Council Highways team, neighbouring authorities and Sport England to improve air quality. These will be listed in the Annual Status Reports, with updates on progress.

Public Health England's Public Health Outcomes Framework tool shows that in Exeter in 2022 the fraction of mortality attributable to particulate air pollution was 3.1%. This is below the regional figure for the south west (4.6%) and the national level of 5.8%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in the majority of the country. The data is available at [this link](#). The modelling on which this is based suggests that average PM_{2.5} concentrations in Exeter in 2021 (the latest year for which data is available) were 6.6 µg/m³. This is below the south west level of 6.8 and the national figure of 7.4 µg/m³.

The Annual Status Report also summarises the results of particulate pollution measurements (PM₁₀ and PM_{2.5}). No areas in the city are thought to exceed the current objectives for this type of air pollution.

The annual average EU limit value for PM_{2.5} is 25 µg/m³ and there is no suggestion that this level is being exceeded in Exeter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of 10 µg/m³ as an annual mean, to be achieved by 2040. Plans to achieve this will be brought forward by DEFRA on behalf of HM Government. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

There were no measured exceedences of the PM₁₀ air quality objectives in Exeter in 2023. Annual average concentrations rose slightly in 2023 compared to the previous four years. The longer-term trend in annual concentrations is a decline since 2005 or 2006. The data will be monitored over the coming years to identify whether this recent increase is part of

an emerging trend or caused by expected inter-annual variability as a result of weather patterns etc.

Actions to Improve Air Quality

Whilst air quality has improved significantly in recent decades, there are some areas where local action is needed to protect people and the environment from the effects of air pollution.

The Environmental Improvement Plan³ sets out actions that will drive continued improvements to air quality and to meet the new national interim and long-term targets for fine particulate matter (PM_{2.5}), the pollutant of most harmful to human health. The Air Quality Strategy⁴ provides more information on local authorities' responsibilities to work towards these new targets and reduce fine particulate matter in their areas.

The Road to Zero⁵ details the Government's approach to reduce exhaust emissions from road transport through a number of mechanisms, in balance with the needs of the local community. This is extremely important given that cars are the most popular mode of personal travel and the majority of Air Quality Management Areas (AQMAs) are designated due to elevated concentrations heavily influenced by transport emissions.

Exeter City Council has taken forward a number of direct measures during the current reporting year of 2023 in pursuit of improving local air quality. Further details are provided later in the report but key completed measures include:

1. Exeter City Council has continued to implement its Physical Activity Strategy. The strategy focusses on getting the least active members of the community moving more (including active travel) with a key focus being to normalise and increase active travel in everyday life. It also prioritises development projects for the Wonford Health & Wellbeing Centre to include a cycling hub on Exeter's Green Circle and family activity trails around the Ludwell valley. It will also implement walking / cycling improvements as part of Newtown Neighbourhood enhancements,

³ Defra. Environmental Improvement Plan 2023, January 2023

⁴ Defra. Air Quality Strategy – Framework for Local Authority Delivery, August 2023

⁵ DfT. The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy, July 2018

strengthening active travel connections with city centre and rest of the cycle network.

2. The Sport England Local Delivery Pilot team has developed and tested the governance and application structure for communities to be able to implement localised, regular closures of roads within their neighbourhoods. For specific periods this will provide sections of roads where the priority will be given to activity (play) rather than travel. The SELDP team was also involved in the school streets projects discussed below.
3. The large solar array with battery storage at Water Lane installed by Exeter City Council is operational. It powers the first three of an intended fleet of electric refuse collection vehicles.
4. Scrutiny of planning applications for air quality impacts has continued, including making objections to developments on air quality grounds where this is justified and the negotiation of mitigation in accordance with Council and national planning policy.
5. From 1st Jan 2020 adopted policy required the Hackney carriage fleet to be 50% Euro 6 wheelchair accessible vehicles and 50% ULEV saloon cars with a stated emission level of 75g km CO₂ or below. This policy continues to be implemented.
6. A reduction in NOx emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include building the next phase of PassivHaus standard homes by Exeter City Council, completion of an Extra Care facility and a leisure centre and swimming pool both meeting the PassivHaus standard and continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court, Park Farm, and Exeter Science Park. The Council is also working with number of other city public sector partners to create a new District Heat Network across the city centre.
7. A new city centre bus station has been delivered providing improved facilities for public transport users in the city.
8. The City Council were partners with Devon County Council and Co Delivery in a scheme which secured an £80,000 grant from the Department for Transport Energy Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes were secured for use within the partner organisations, Devon

County Council, Exeter City Council, University of Exeter and Royal Devon & Exeter NHS Foundation Trust (RD&E). These are now operational including at the City Council where three bikes are used to replace vehicle trips. This pilot project seeks to encourage the transition to carbon neutral modes of business travel.

9. Devon County Council continues to implement the 2020 Transport Strategy. This has three themes: Greater Connectivity, Greater Places for People and Greater Innovation. Key targets within the strategy include:
 - 50% of trips by foot or cycle within the city;
 - Removal of air quality exceedances in the city.
10. Devon County Council have adopted their Exeter Local Cycling and Walking Infrastructure Plan in January 2024
11. DCC have continued their Travel Planning service provided to new residential developments.
12. A new station opened at Marsh Barton in July 2023, and provides easy rail access to Marsh Barton (Exeter's largest industrial estate) as well as Exeter Canal/ Riverside Valley Park and it is the closest station to the new developments in South West Exeter. It is located on the line between Paignton and Exmouth, with half-hourly services at peak times.
13. The Okehampton railway line has reopened to hourly services on a daily basis. This provides a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton. Design work is underway to deliver the Okehampton Interchange, which is a 'Parkway style' station, funded through DfT Levelling Up Funds. It will serve the wider rural catchment of west Devon, Torridge and north Cornwall.
14. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes included the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at Russell Way). Some of these pop-up measures have since been made permanent, such as the road closures and modal filters on Ludwell Lane, Dryden Road, Wonford Road and Magdalen Road. Devon County Council have also introduced modal filters on the E3 route which include Homefield Road and Chard Road.
15. Circa 700m of segregated cycle route on Rifford Road has been approved, which forms part of E12 ('north-south') route and would link the Sweetbrier Lane section

through the Wonford area with options to connect into the E9 route or beyond towards the valley park / Exe Estuary. Construction work will commence in 2024 for completion in early 2025.

16. Permanent school streets have been introduced at Whipton Barton School and Ladysmith School. The school streets are community led schemes that restrict traffic outside schools at pick up / drop off times to create a calmer, safer, and more pleasant environment, for families and children to walk, wheel or cycle to school.
17. A series of Modal Filters to form a Low Traffic Neighbourhood were introduced in the Heavitree area on a trial basis in August 2023. In June 2024, the Exeter Highways and Traffic Order Committee agreed to suspend the Experimental Traffic order associated with the trial.
18. A new Park and Change site at the Science Park has been opened. It is currently being used as a Park and Ride for the Nightingale Hospital.
19. Improved 'green lane' cycle linkages from 'urban fringe settlements' into the Exeter cycle network including from Woodbury (connecting to Exe Estuary Trail), from Cranbrook and the Science Park via Langaton Lane and from Ide via Balls Farm Road.
20. The reallocation of road space on Queen Street has been made permanent, delivering widened pedestrian areas and removing northbound vehicular traffic except for buses and cycles. The changes help remove dominance of vehicles from the city centre streets and create a more attractive environment for active travel.
21. Bus patronage has recovered to some extent from the effect of Covid 19 lockdowns. Devon County Council have obtained funding (over 3 years) for its Bus Service Improvement Plan across the County. This includes plans for improving bus priority four key Exeter corridors (the Eastern, Central, Western and Northern corridors). Proposals include improving bus priority using technology, bus lane operation time changes, and physical infrastructure improvements. They have also been successful in a joint bid with Stagecoach to provide electric ('Zebra') buses on routes 4, A, and the Green Park and Ride.
22. Pinhoe Station interchange has been delivered, with a shuttle bus alongside bike lockers, electric vehicle chargers and a new car park to provide an integrated rail hub, linking passengers arriving at Pinhoe to the Science Park, SkyPark, Exeter Gateway logistics park and Exeter Airport.

Exeter City worked to implement these measures in partnership with the following stakeholders during 2023:

- Neighbouring authorities
- Devon County Council (Highways and Public Health)
- Sport England

Exeter City Council expects the following measures to be completed over the course of the next reporting year:

- DEFRA grant funding has been obtained for a project to develop a model of pollution concentrations in the Heavitree corridor which will provide better spatial and temporal resolution than the current monitoring. This will be overlaid with health information, enabling more informed choices by the travelling public. Work on the project is progressing according to the project plan, with the air quality sensors installed just before the end of the 2023 reporting year. Further information on the project is available at [this link](#).
- Further refinement of the net zero plan for Exeter. Executive & Council have agreed for the City Council to take on the leadership role for city wide net zero. A programme manager will be recruited in 2024. This new role will support businesses / communities / residents to reduce their carbon emissions.
- Implementation of the Transport Strategy and LCWIP by DCC, in conjunction with the Active and Healthy People Programme team.
- Sport England Project work will continue; including on the Wonford Health and Wellbeing Centre, Newtown active neighbourhood, enabling road closures for play streets and community events, community builders and social prescribing.
- Work to enable the delivery of a Water Lane low traffic neighbourhood through redevelopment of brownfield land.
- All new vehicles entering the Council's fleet are likely to be electric (unless there is no availability of vehicles meeting the specific operational requirements on the market).

- DCC will continue to monitor traffic within the Heavitree and Whipton area following the Heavitree and Whipton Active Streets Trial filtered permeability project.
- Further improvements will take place to cycle routes. In addition to constructing the bi-directional route along Rifford Road, further design work is underway to link this to Burnthouse Lane/ Dryden Road and two crossings are being designed to join the route to other existing cycle infrastructure along the E12 route. This will make it safer and easier to travel by bike.
- £14m of funding (over 3yrs) has been received by Devon County Council for its Bus Service Improvement Plan across the County. Additional funding will deliver a fleet of electric buses to operate on the 4, A and Green Park & Ride routes.
- The Council have received a grant to replace gas boilers with heat pumps at the RAMM and the Riverside leisure centre in a two year project to be completed by April 2025. This will reduce NOx emissions from the old boilers.
- 2024 car park charges are set to increase by 5%, with implementation in October 2024. Mary Arches surface and MSCP are expected to be sold during 2024, so total parking provision in the city centre will reduce. As part of the work to deliver the Exeter Plan, a number of other city car parks are likely to be repurposed, to allow for housing to be built on brown field land. Work on these plans will continue in 2024.

The principal challenges and barriers to implementation that Exeter City Council anticipates facing are further funding constraints within Local Government and available officer time. There are also challenges in achieving behavioural change, balancing the needs of all groups and allowing local communities to take ownership of initiatives. The Active Streets scheme in Heavitree and Whipton was trialled for over 9 months. The results of that show a significant level of opposition to the trial. Whilst there have been some positives, the trial has been suspended by Devon County Council due to the adverse impacts that have been identified for those people with protected characteristics.

Progress on the following measures has been slower than expected due to:

- Changes to the proposed planning policy framework because the Greater Exeter Strategic (GESp) Plan is no longer being progressed. The Exeter Plan will shape the future of Exeter for the next 20 years, to 2040, and will be the basis for how the

city continues to evolve and meet the needs of the community. The Exeter Plan is the new name for the Local Plan. It will be the main planning document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications.

- Bus patronage has not fully recovered to pre pandemic levels. There was already a downward trend prior to Covid because this was accelerated by lockdowns. The future of public transport and the measures needed to encourage passengers back safely will be considered in 2024 and beyond in Devon County Council's Bus Service Improvement Plan.
- The company delivering the car club and co-bikes schemes has gone into administration. Devon County Council are currently looking to procure an alternative provider.

Conclusions and Priorities

Nitrogen dioxide levels in Exeter in 2023 were generally similar to those in 2022, below those measured in 2021 and well below pre-pandemic concentrations. There is now sufficient data to be confident that only one location remains above the objective (East Wonford Hill). It is proposed to reduce the AQMA boundary as described in Appendix F so that it only includes the area of exceedance and allows a new, focussed Action Plan to be produced. A timetable for these changes is shown above.

No areas in the city are thought to exceed the objectives for particulate air pollution. Measured PM_{2.5} concentrations are below the current objective level and PM₁₀ concentrations have shown a general decline since 2006.

As well as the changes to the AQMA and AQAP, the priorities and challenges for 2024 are:

- To implement the DEFRA Air Quality Grant project
- To support the delivery of the Physical Activity Strategy, Transport Strategy, Local Cycling and Walking Implementation Plan (LCWIP)
- To deliver robust planning policy

- To continue to support DCC in reviewing the impact of the experimental traffic orders in the Heavitree area.
- In the interim period between the expiry of the current plan and the publication of a new plan, Exeter City Council will continue to take the actions listed in Table 2.2, with partners, to improve air quality. If it appears that additional measures are likely to be required, these will be described fully in the next Annual Status Report.

These will be delivered in the face of challenging and uncertain conditions within Local Government.

Local Engagement and How to get Involved

Local air pollution currently has a high profile within the city. For example nearly 3000 people were involved in the consultation on the current AQAP and Devon County Council have committed in their Transportation Strategy to resolve exceedances of the objective.

The Wellbeing Exeter Community Builders are actively engaging with local communities to increase active travel, social inclusion, improve the public realm for walking and cycling and to benefit air quality.

Further enquiries about pollution levels and actions to improve air quality should be made to environmental.health@exeter.gov.uk.

Local Responsibilities and Commitment

This ASR was prepared by the Environmental Health & Community Safety Department of Exeter City Council with the support and agreement of the following officers and departments:

Exeter City Council - City Development

Exeter City Council – Active and Healthy People Programme

Devon County Council - Highways

This ASR has been approved by:

Service Lead (Environmental Health & Community Safety). Once the report has been checked by DEFRA it will be presented to members at committee.

This ASR has been signed off by the Devon County Council Director of Public Health, who commented, "...we welcome the continued measures to improve air quality and population exposure, with cobenefits for the environment, and health, including in relation to increased activity through active travel, and other initiatives."

If you have any comments on this ASR please send them for the attention of Alex Bulleid:

Exeter City Council

Environmental Health and Community Safety

Civic Centre

Paris Street

Exeter

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1 Local Air Quality Management

This report provides an overview of air quality in Exeter during 2023. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995), as amended by the Environment Act (2021), and the relevant Policy and Technical Guidance documents.

The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. Where an exceedance is considered likely the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in order to achieve and maintain the objectives and the dates by which each measure will be carried out. This Annual Status Report (ASR) is an annual requirement showing the strategies employed by Exeter City Council to improve air quality and any progress that has been made.

The statutory air quality objectives applicable to LAQM in England are presented in Table E.1.

2 Actions to Improve Air Quality

2.1 Air Quality Management Areas

Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority should prepare an Air Quality Action Plan (AQAP) within 18 months. The AQAP should specify how air quality targets will be achieved and maintained, and provide dates by which measures will be carried out.

A summary of AQMAs declared by Exeter City Council can be found in Table 2.1. The table presents a description of the one AQMA that is currently designated within Exeter. Appendix D: Map(s) of Monitoring Locations and AQMAs provides maps of AQMA and also the air quality monitoring locations in relation to the AQMA. The air quality objectives pertinent to the current AQMA designation are as follows:

- NO₂ annual mean;
- NO₂ hourly mean.

We propose to amend the Exeter AQMA to significantly reduce the area included and to remove the NO₂ hourly mean objective which is no longer exceeded within Exeter. Full details are available in Appendix F.

Table 2.1 – Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	One Line Description	Is air quality in the AQMA influenced by roads controlled by Highways England?	Level of Exceedance: Declaration	Level of Exceedance: Current Year	Number of Years Compliant with Air Quality Objective	Name and Date of AQAP Publication	Web Link to AQAP
Exeter AQMA 1	Declared 2007, Amended 2011	NO2 Annual Mean	An area encompassing the radial routes into the city and other major routes.	NO	70 µg/m3	40.5	N/A	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution
Exeter AQMA 1	Declared 2007, Amended 2011	NO2 1 Hour Mean	An area encompassing the radial routes into the city and other major routes.	NO	65 µg/m3	N/A	5 years	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution

Exeter City Council confirm the information on UK-Air regarding their AQMA(s) is up to date.

Exeter City Council confirm that all current AQAPs have been submitted to Defra.

2.2 Progress and Impact of Measures to address Air Quality in Exeter

Defra's appraisal of last year's ASR concluded "The report is well structured, detailed, and provides the information specified in the Guidance".

Exeter City Council has taken forward a number of direct measures during the current reporting year of 2023 in pursuit of improving local air quality. Details of all measures completed, in progress or planned are set out in Table 2.2. Seventeen measures are included within Table 2.2, with the type of measure and the progress Exeter City Council have made during the reporting year of 2023 presented. Where there have been, or continue to be, barriers restricting the implementation of the measure, these are also presented within Table 2.2.

More detail on these measures can be found in Air Quality Action Plan, Physical Activity Strategy, Local Walking and Cycling Infrastructure Plan and Transportation Strategy. Key completed measures are:

1. Exeter City Council has continued to implement its Physical Activity Strategy. The strategy focusses on getting the least active members of the community moving more (including active travel) with a key focus being to normalise and increase active travel in everyday life. It also prioritises development projects for the Wonford Health & Wellbeing Centre to include a cycling hub on Exeter's Green Circle and family activity trails around the Ludwell valley. It will also implement walking / cycling improvements as part of Newtown Neighbourhood enhancements, strengthening active travel connections with city centre and rest of the cycle network.
2. The Sport England Local Delivery Pilot team has developed and tested the governance and application structure for communities to be able to implement localised, regular closures of roads within their neighbourhoods. For specific periods this will provide sections of roads where the priority will be given to activity (play) rather than travel. The SELDP team was also involved in the school streets projects discussed below.
3. The large solar array with battery storage at Water Lane installed by Exeter City Council is operational. It powers the first three of an intended fleet of electric refuse collection vehicles.

4. Scrutiny of planning applications for air quality impacts has continued, including making objections to developments on air quality grounds where this is justified and the negotiation of mitigation in accordance with Council and national planning policy.
5. From 1st Jan 2020 adopted policy required the Hackney carriage fleet to be 50% Euro 6 wheelchair accessible vehicles and 50% ULEV saloon cars with a stated emission level of 75g km CO₂ or below. This policy continues to be implemented.
6. A reduction in NOx emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include building the next phase of PassivHaus standard homes by Exeter City Council, completion of an Extra Care facility and a leisure centre and swimming pool both meeting the PassivHaus standard and continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court, Park Farm, and Exeter Science Park. The Council is also working with number of other city public sector partners to create a new District Heat Network across the city centre.
7. A new city centre bus station has been delivered providing improved facilities for public transport users in the city.
8. The City Council were partners with Devon County Council and Co Delivery in a scheme which secured an £80,000 grant from the Department for Transport Energy Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes were secured for use within the partner organisations, Devon County Council, Exeter City Council, University of Exeter and Royal Devon & Exeter NHS Foundation Trust (RD&E). These are now operational including at the City Council where three bikes are used to replace vehicle trips. This pilot project seeks to encourage the transition to carbon neutral modes of business travel.
9. Devon County Council continues to implement the 2020 Transport Strategy. This has three themes: Greater Connectivity, Greater Places for People and Greater Innovation. Key targets within the strategy include:
 - 50% of trips by foot or cycle within the city;
 - Removal of air quality exceedances in the city.
10. Devon County Council have adopted their Exeter Local Cycling and Walking Infrastructure Plan in January 2024

11. DCC have continued their Travel Planning service provided to new residential developments.
12. A new station opened at Marsh Barton in July 2023, and provides easy rail access to Marsh Barton (Exeter's largest industrial estate) as well as Exeter Canal/ Riverside Valley Park and it is the closest station to the new developments in South West Exeter. It is located on the line between Paignton and Exmouth, with half-hourly services at peak times.
13. The Okehampton railway line has reopened to hourly services on a daily basis. This provides a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton. Design work is underway to deliver the Okehampton Interchange, which is a 'Parkway style' station, funded through DfT Levelling Up Funds. It will serve the wider rural catchment of west Devon, Torridge and north Cornwall.
14. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes included the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at Russell Way). Some of these pop-up measures have since been made permanent, such as the road closures and modal filters on Ludwell Lane, Dryden Road, Wonford Road and Magdalen Road. Devon County Council have also introduced modal filters on the E3 route which include Homefield Road and Chard Road.
15. Circa 700m of segregated cycle route on Rifford Road has been approved, which forms part of E12 ('north-south') route and would link the Sweetbrier Lane section through the Wonford area with options to connect into the E9 route or beyond towards the valley park / Exe Estuary. Construction work will commence in 2024 for completion in early 2025.
16. Permanent school streets have been introduced at Whipton Barton School and Ladysmith School. The school streets are community led schemes that restrict traffic outside schools at pick up / drop off times to create a calmer, safer, and more pleasant environment, for families and children to walk, wheel or cycle to school.
17. A series of Modal Filters to form a Low Traffic Neighbourhood were introduced in the Heavitree area on a trial basis in August 2023. In June 2024, the Exeter Highways and Traffic Order Committee agreed to suspend the Experimental Traffic order associated with the trial.

18. A new Park and Change site at the Science Park has been opened. It is currently being used as a Park and Ride for the Nightingale Hospital.
19. Improved 'green lane' cycle linkages from 'urban fringe settlements' into the Exeter cycle network including from Woodbury (connecting to Exe Estuary Trail), from Cranbrook and the Science Park via Langaton Lane and from Ide via Balls Farm Road.
20. The reallocation of road space on Queen Street has been made permanent, delivering widened pedestrian areas and removing northbound vehicular traffic except for buses and cycles. The changes help remove dominance of vehicles from the city centre streets and create a more attractive environment for active travel.
21. Bus patronage has recovered to some extent from the effect of Covid 19 lockdowns. Devon County Council have obtained funding (over 3 years) for its Bus Service Improvement Plan across the County. This includes plans for improving bus priority four key Exeter corridors (the Eastern, Central, Western and Northern corridors). Proposals include improving bus priority using technology, bus lane operation time changes, and physical infrastructure improvements. They have also been successful in a joint bid with Stagecoach to provide electric ('Zebra') buses on routes 4, A, and the Green Park and Ride.
22. Pinhoe Station interchange has been delivered, with a shuttle bus alongside bike lockers, electric vehicle chargers and a new car park to provide an integrated rail hub, linking passengers arriving at Pinhoe to the Science Park, SkyPark, Exeter Gateway logistics park and Exeter Airport.

Exeter City worked to implement these measures in partnership with the following stakeholders during 2023:

- Neighbouring authorities
- Devon County Council
- Sport England

Progress on the following measures has been slower than expected due to:

- Changes to the proposed planning policy framework because the Greater Exeter Strategic (GESp) Plan is no longer being progressed. The Exeter Plan will shape

the future of Exeter for the next 20 years, to 2040, and will be the basis for how the city continues to evolve and meet the needs of the community. The Exeter Plan is the new name for the Local Plan. It will be the main planning document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications.

- Bus patronage has not fully recovered to pre pandemic levels. There was already a downward trend prior to Covid because this was accelerated by lockdowns. The future of public transport and the measures needed to encourage passengers back safely will be considered in 2024 and beyond in Devon County Council's Bus Service Improvement Plan.
- The company delivering the car club and co-bikes schemes has gone into administration. Devon County Council is reviewing the options to re-procure these services.

Exeter City Council expects the following measures to be completed over the course of the next reporting year:

- DEFRA grant funding has been obtained for a project to develop a model of pollution concentrations in the Heavitree corridor which will provide better spatial and temporal resolution than the current monitoring. This will be overlaid with health information, enabling more informed choices by the travelling public. Work on the project is progressing according to the project plan, with the air quality sensors installed just before the end of the 2023 reporting year. Further information on the project is available at [this link](#).
- Further refinement of the net zero plan for Exeter. Executive & Council have agreed for the City Council to take on the leadership role for city wide net zero. A programme manager will be recruited in 2024. This new role will support businesses / communities / residents to reduce their carbon emissions.
- Implementation of the Transport Strategy and LCWIP by DCC, in conjunction with the Active and Healthy People Programme team.
- Sport England Project work will continue; including on the Wonford Health and Wellbeing Centre, Newtown active neighbourhood, enabling road closures for play streets and community events, community builders and social prescribing.

- Work to enable the delivery of a Water Lane low traffic neighbourhood through redevelopment of brownfield land.
- All new vehicles entering the Council's fleet are likely to be electric (unless there is no availability of vehicles meeting the specific operational requirements on the market).
- DCC will continue to monitor traffic within the Heavitree and Whipton area following the Heavitree and Whipton Active Streets Trial filtered permeability project.
- Further improvements will take place to cycle routes. In addition to constructing the bi-directional route along Rifford Road, further design work is underway to link this to Burnthouse Lane/ Dryden Road and two crossings are being designed to join the route to other existing cycle infrastructure along the E12 route. This will make it safer and easier to travel by bike.
- £14m of funding (over 3yrs) has been received by Devon County Council for its Bus Service Improvement Plan across the County. Additional funding will deliver a fleet of electric buses to operate on the 4, A and Green Park & Ride routes.
- The Council have received a grant to replace gas boilers with heat pumps at the RAMM and the Riverside leisure centre in a two year project to be completed by April 2025. This will reduce NOx emissions from the old boilers.
- 2024 car park charges are set to increase by 5%, with implementation in October 2024. Mary Arches surface and MSCP are expected to be sold during 2024, so total parking provision in the city centre will reduce. As part of the work to deliver the Exeter Plan, a number of other city car parks are likely to be repurposed, to allow for housing to be built on brown field land. Work on these plans will continue in 2024.

Exeter City Council's priorities for the coming year are:

- To implement the DEFRA Air Quality Grant project
- To support the delivery of the Physical Activity Strategy, Transport Strategy, Local Cycling and Walking Implementation Plan (LCWIP)
- To deliver robust planning policy
- To continue to support DCC in reviewing the impact of the experimental traffic orders in the Heavitree area.

Exeter City Council's NO₂ monitoring data shows that during the period of the current AQAP concentrations have fallen significantly, such that only one small area now exceeds the relevant objective. A timetable is proposed in this report for the amendment of a new, smaller AQMA boundary and the publication of an AQAP for the new area. In the interim period between the expiry of the current plan and the publication of a new plan, Exeter City Council will continue to take action, with partners, to improve air quality (including the measures listed in this document). These will be described in the next Annual Status Report, with an update on progress. If it appears that additional measures are likely to be required, these will be described fully in the next Annual Status Report.

The principal challenges and barriers to implementation that Exeter City Council anticipates facing are further funding constraints within Local Government and available officer time. There are also challenges in achieving behavioural change, balancing the needs of all groups and allowing local communities to take ownership of initiatives. The Active Streets scheme in Heavitree and Whipton was trialled for over 9 months. The results of that show a significant level of opposition to the trial. Whilst there have been some positives, the trial has been suspended by Devon County Council due to the adverse impacts that have been identified for those people with protected characteristics.

In summary, the measures stated above and in Table 2.2 will help to contribute towards compliance. Exeter City Council will identify whether further additional measures not yet prescribed will be required in subsequent years to achieve compliance and discuss these in the next Annual Status Report prior to publication of a new AQAP.

Table 2.2 – Progress on Measures to Improve Air Quality

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
1 (green measure)	Filtered permeability projects to be considered for the city with an initial focus on the Heavitree corridor area and including a feasibility study for corridor improvements	Policy Guidance and Development Control	Other policy	2019	2024	DCC via Transport Strategy and Exeter City Futures, Sport England Local Delivery Pilot	SELDP, DCC, Developer Contributions, Grant Funding where available and ECC	NO	Partially Funded	£50k - £100k	Implementation	The target for design of permanent changes to the Heavitree corridor area will be to eliminate exceedences. Details will be finalised as the design emerges, but it is currently expected that a reduction in emissions of between 39 and 78% will be required	Implementation of scheme(s)	Pop up measures introduced in 2020, including a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre) have been made permanent with road closures and modal filters on Ludwell Lane, Dryden Road, Wonford Road and Magdalen Road. School streets introduced at Whipton Barton School and Ladysmith School. Heavitree and Whipton Active Streets Trial commenced September 2023. HATOC members decided to suspend the trial in June 2024. A wider package of measures, including play streets is being developed by the Sport England team.	Plans need community ownership to be successful

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
2 (amber measure)	Consider access restrictions which will reduce the dominance of private cars, including in the city centre	Policy Guidance and Development Control	Other policy	2019	2024	DCC via Transport Strategy and Exeter City Futures	DCC, grant funding as available and developer contributions	NO	Partially Funded	£100k - £500k	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme(s)	Traffic reduction scheme for Bartholomew Street West, one way system for Queen Street (allowing for the footway to be widened). Roadside interviews in the city centre undertaken to inform a city centre traffic strategy. Liveable Exeter vision for the city published, which includes development on car parks, and a reduction in road space for cars. Quay to City route improvements made (Quay Hill two way cycling allowed, a plant box introduced at Commercial Road to prevent cars blocking walking and cycling access and a contra-flow cycle lane provided at West Street). Local Walking and Cycling Implementation Plan adopted January 2024.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding.

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
3 (amber measure)	New transport links and Park & Change facilities to make it easier for those living outside the city to choose active and sustainable travel modes	Transport Planning and Infrastructure	Other	2019	Ongoing Programme	DCC via Transport Strategy	DCC, grant funding as available and developer contributions	NO	Partially Funded	£100k - £500k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of schemes	Pinhoe and Science Park Park and Change sites delivered. Okehampton line reopened for hourly, daily travel and new station delivered at Marsh Barton. Improved walking and cycling infrastructure delivered on Rydon Lane connecting Woodbury to the Exe Estuary Trail. Further consultation held to close the lane to motorised traffic. Modal filter on Langaton Lane constructed, delivering quiet lane link between Pinhoe area, Exeter Science Park and wider East Devon strategic employment sites. Balls Farm Road modal filter near Alphington constructed to improve quiet lane linkages between Ide and Exeter. Plans being developed for improving bus priority to reduce journey times and improve reliability. Funding obtained for electric buses on routes 4, A and Green P&R.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
4 (yellow measure)	Changes to parking charges to discourage car travel in peak times, encourage longer stays in the city centre and support other measures in this plan, such as active travel	Traffic Management	Other	2019	2024	ECC via Local Plan	ECC	NO	Not Funded	£100k - £500k	Planning	<1% reduction in emissions. This measure is expected to have an indirect effect on emissions, such that it is not possible to reliably quantify the impact of this measure alone.	Implementation of changes	Parking charges across Exeter are designed to balance the need for parking against the harm that private car travel into the city centre can cause, especially at peak times.	The need to balance action against any real or perceived impact on local businesses.
5	Maximise efficiency of existing highway network	Transport Planning and Infrastructure	Other	2019	2024	DCC via Transport Strategy and Exeter City Futures	DCC, ECC, grant funding as available and developer contributions	NO	Partially Funded	£500k - £1 million	Planning	TBC, based on predicted changes to traffic parameters provided by DCC as plans for specific locations emerge and are consulted upon	Implementation of scheme(s)	In planning phase	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
6 (amber measure)	Access Fund and cycle/walking network, Local Walking and Cycling Infrastructure Plan (LCWIP)	Transport Planning and Infrastructure	Other	2019	2024	DCC via Transport Strategy	Access Fund	NO	Partially Funded	£1 million - £10 million	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Adoption of LCWIP	Modal filters introduced under emergency active travel fund made permanent to deliver sections of the E9 route between Pynes Hill and City centre via the RD&E. E12 route on Rifford Road under construction. Bi-directional route on Sweetbrier Lane delivered. The LCWIP was adopted in January 2024	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
7 (amber measure)	Expand school and community projects, car free events and events promoting active travel, building on the success of the Heavitree pilot	Promoting Travel Alternatives	Other	2019	2024	ECC via Sport England Local Delivery Pilot & Exeter City Futures	Sport England funding	NO	Partially Funded	£50k - £100k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	School Streets introduced	Trials at three primary schools in 2020, two made permanent (Whipton Barton and Ladysmith). Community Builders and new SELDP local Physical Activity Organisers delivered play street 'non car events'	Plans will be developed in individual areas with local communities.
8 (amber measure)	Use social prescribing and community building to help individuals get and stay active	Public Information	Other	2019	2024	ECC via Sport England Local Delivery Pilot and local Health Service providers	Sport England funding	NO	Partially Funded	£100k - £500k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme	Behaviour change training delivered for all Community Builders and Community Connectors to provide support to people to lead active lifestyles. New social prescribing posts recruited to support health & wellbeing of Children and Young Families.	
9 (amber measure)	High quality parks, play areas, sport and leisure facilities	Promoting Travel Alternatives	Other	2019	2024	ECC via Physical Activity Strategy, Sport England Local Delivery Pilot & Local Plan	Sport England funding	NO	Partially Funded	£50k - £100k	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme(s)	Physical Activity Strategy published and flagship programmes in development - Wonford Health & Wellbeing Centre to be delivered first. Focus on sites becoming more accessible for sustainable transport and increased active travel infrastructure	Obtaining necessary permissions and consents, and funding

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
10 (yellow measure)	Communications plan, to support measures that will achieve modal shift	Public Information	Other	2019	2024	ECC via Sport England Local Delivery Pilot & Exeter City Futures	ECC via existing internal budgets, Sport England Local Delivery Pilot & Exeter City Futures	YES	Partially Funded	£10k - 50k	Implementation	<1% reduction in emissions. The purpose of this measure is to enable the Council to explain why it is taking action. The measure itself is unlikely to have significant impact on its own.	Completion of DEFRA grant project for Heavitree area	DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area. Communications strategy developed through SELDP - 'Let's Move'. Focus on small steps for 'least active' residents and communities to move more in their local neighbourhoods. Walking & Cycling central to this communications strategy	
11 (yellow measure)	Promote and expand Co-Bikes network, and support the roll out of electric car club vehicles to more locations	Promoting Travel Alternatives	Other	2019	2024	DCC, ECC via Transport Strategy, Sport England Local Delivery Pilot & Exeter City Futures	Ongoing programme, dependent on funding availability	NO	Partially Funded	£100k - £500k	Implementation	<1% reduction in emissions. This measure will have indirect benefits for air quality by facilitating active travel and supporting a change in car ownership patterns. It is not possible to reliably model the impact of this measure alone on emissions	Implementation of expansions to schemes, as funding is obtained	A substantial network of bikes and cars was created	Devon County Council considering the procurement of a new provider

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
12 (amber measure)	An improved multi-modal public transport network, incorporating cleaner bus technologies	Transport Planning and Infrastructure	Other	2019	2024	DCC via GESP, Transport Strategy and Exeter City Futures	TBC	NO	Partially Funded	> £10 million	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes). As an example, 33% bus electrification would achieve 5% fall in emissions at East Wonford Hill and 66% electrification would achieve 10% reduction.	Implementation of agreed plans	14 Euro 6 busses have entered the fleet and significant new additions to the city's bus network. Devon County Council's Bus Service Improvement Plan will deliver improved services and access across the County. Funding obtained for electric buses on routes 4, A and Green Park and Ride	Dependent on funding availability and future demand for public transport.
13	Developers to mitigate the effects of their development on air quality	Policy Guidance and Development Control	Other policy	2019	2024	ECC via the Exeter Plan	Within existing ECC resources	NO	Funded	£50k - £100k	Planning	The purpose of this measure is to limit the impact of new development. It is not intended to reduce emissions on the current baseline (although some reduction may be achieved as a result in practice)	Developments delivered	Until the Exeter Plan is published, officers will be implementing current policy in a robust manner eg when considering retail park applications and new housing.	The AQAP originally envisaged that this would be delivered by the GESP. However the GESP is no longer being progressed. Instead, the Exeter Plan will shape the future of Exeter for the next 20 years. The Exeter Plan is the new name for the Local Plan. It will be the main planning document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications.

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
14	Policies deliver development where private car use is not the only realistic travel choice	Policy Guidance and Development Control	Other policy	2019	2024	ECC via the Exeter Plan	Within existing ECC resources	NO	Funded	£50k - £100k	Planning	The purpose of this measure is to limit the impact of new development. It is not intended to reduce emissions on the current baseline (although some reduction may be achieved as a result in practice)	Developments delivered	Liveable Exeter vision for development in the city which is not reliant on car travel. Until the Exeter Plan is published, officers will be implementing current policy in a robust manner eg when considering retail park applications and new housing.	Work on the Liveable Exeter project continues alongside the Exeter Plan (this has replaced the GESP which may have resulted in some delay from when the AQAP was published). (see measure 13).
15 (yellow measure)	More things to see/do in the City Centre, encouraging longer stays and supporting events which promote sustainable travel, active and healthy lifestyles.	Policy Guidance and Development Control	Other policy	2019	2024	ECC, BID, DCC and developers	TBC once strategy adopted	NO	Partially Funded		Planning	<1% reduction in emissions. This measure will not have a significant direct impact on emissions but will support the step change in behaviour which will be required to meet the City Council's aspirations for active and healthy travel.	Completion of Strategy and then implementation	St Sidwells Point leisure centre open. South Street plan completed and awaiting funding to deliver. Consultants are reviewing City Centre Strategy	
16	Better information to raise awareness and improve the level of understanding of air pollution and transport issues within communities	Public Information	Other	2019	2024	ECC	Internal ECC budgets	YES	Partially Funded	£10k - 50k	Planning	Enable the Council to explain why it is taking action. Measure itself is unlikely to have significant impact on its own.	Completion of DEFRA grant funded project	DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area. Baseline evidence report completed subject to annual review following publication of each year's measurement data and any new research, national guidance etc.	

Measure No.	Measure Title	Category	Classification	Year Measure Introduced in AQAP	Estimated / Actual Completion Date	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
17	An air pollution monitoring network that supports the measures in this action plan	Public Information	Other	2019	2024	ECC	Internal ECC budgets or grant funding if available	YES	Funded	< £10k	Implementation	This measure would not in itself deliver reductions in emissions, but would support the other measures in this plan	monitoring equipment operational	Diffusion tube monitoring network remains under review. DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area which includes use of new sensor technologies.	

2.3 PM_{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations

As detailed in Policy Guidance LAQM.PG22 (Chapter 8) and the Air Quality Strategy⁶, local authorities are expected to work towards reducing emissions and/or concentrations of fine particulate matter (PM_{2.5}). There is clear evidence that PM_{2.5} (particulate matter smaller 2.5 micrometres) has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

Public Health England's Public Health Outcomes Framework tool shows that in Exeter in 2022 the fraction of mortality attributable to particulate air pollution was 3.1%. This is below the regional figure for the south west (4.6%) and the national level of 5.8%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in the majority of the country. The data is available at [this link](#). The modelling on which this is based suggests that average PM_{2.5} concentrations in Exeter in 2021 (the latest year for which data is available) were 6.6 µg/m³. This is below the south west level of 6.8 and the national figure of 7.4 µg/m³.

There is now a capacity for direct monitoring of PM_{2.5} in Exeter, since August 2018, at two roadside sites. This showed PM_{2.5} concentrations of 13.2 µg/m³ at RAMM and 8.8 µg/m³ at Alphington Street in 2023. National modelling by PHE (available via the website above) suggests that for 2021 (the most recent data available), the average figure for the city as a whole was 6.6 µg/m³. The annual average EU limit value for PM_{2.5} is 25 µg/m³ so there is no suggestion that this level is being exceeded in Exeter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of 10 µg/m³ as an annual mean, to be achieved by 2040. Plans to achieve this will be brought forward by DEFRA on behalf of HM Government. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

⁶ Defra. Air Quality Strategy – Framework for Local Authority Delivery, August 2023

Despite these being targets for central government, Exeter City Council still has a duty to reduce emissions of and exposure to this pollutant. During 2023, Exeter City Council will be taking the measures described in Table 2.2 that will address PM_{2.5} as well as NO₂.

Approximately 60% of Exeter is designated as Smoke Control Areas. Controls on solid fuel combustion appliances and fuels are likely to have restricted PM_{2.5} emissions in these areas to some extent.

3 Air Quality Monitoring Data and Comparison with Air Quality Objectives and National Compliance

This section sets out the monitoring undertaken within 2023 by Exeter City Council and how it compares with the relevant air quality objectives. In addition, monitoring results are presented for a five-year period between 2019 and 2023 to allow monitoring trends to be identified and discussed.

3.1 Summary of Monitoring Undertaken

3.1.1 Automatic Monitoring Sites

Exeter City Council undertook automatic (continuous) monitoring at 2 sites during 2023. Table A.1 in Appendix A shows the details of the automatic monitoring sites. NB. Local authorities do not have to report annually on the following pollutants: 1,3 butadiene, benzene, carbon monoxide and lead, unless local circumstances indicate there is a problem. This [page](#) presents automatic monitoring results for Exeter, with automatic monitoring results also available through the UK-Air website.

Maps showing the location of the monitoring sites are provided in Appendix D. Further details on how the monitors are calibrated and how the data has been adjusted are included in Appendix C.

3.1.2 Non-Automatic Monitoring Sites

Exeter City Council undertook non-automatic (i.e. passive) monitoring of NO₂ at 84 sites during 2023. Table A.2 in Appendix A presents the details of the non-automatic sites.

Maps showing the location of the monitoring sites are provided in Appendix D. Further details on Quality Assurance/Quality Control (QA/QC) for the diffusion tubes, including bias adjustments and any other adjustments applied (e.g. annualisation and/or distance correction), are included in Appendix C.

3.2 Individual Pollutants

The air quality monitoring results presented in this section are, where relevant, adjusted for bias, annualisation (where the annual mean data capture is below 75% and greater than 25%), and distance correction. Further details on adjustments are provided in Appendix C.

3.2.1 Nitrogen Dioxide (NO₂)

Table A.3 and Table A.4 in Appendix A compare the ratified and adjusted monitored NO₂ annual mean concentrations for the past five years with the air quality objective of 40µg/m³. Note that the concentration data presented represents the concentration at the location of the monitoring site, following the application of bias adjustment and annualisation, as required (i.e. the values are exclusive of any consideration to fall-off with distance adjustment).

For diffusion tubes, the full 2023 dataset of monthly mean values is provided in Appendix B. Note that the concentration data presented in Table B.1 includes distance corrected values, only where relevant.

Table A.5 in Appendix A compares the ratified continuous monitored NO₂ hourly mean concentrations for the past five years with the air quality objective of 200µg/m³, not to be exceeded more than 18 times per year.

The national bias adjustment figure (0.81, from the March spreadsheet) has been used this year because data capture at the Exeter Roadside (CM1) continuous analyser was below 90% (this is because scaffolding for urgent, essential roof repairs at the RAMM has made the data unreliable).

The data shows that no locations measured an exceedence of the proxy for the hourly objective in 2023 (an annual average of 60µg/m³).

Only one site exceeded the objective for annual average concentrations. This was East Wonford Hill (DT57) where concentrations were slightly above the limit (40.5 µg/m³ against an objective of 40). This is within the Exeter AQMA. The general trend in the data for all the monitoring sites is a significant fall in concentrations between 2019 and 2020 with a partial rebound in 2021 and levels since then being roughly stable (see Figure A.1 and the data in Table A.4). This can be attributed to changes in traffic flows as a result of COVID-19 and new travel & working behaviours (see table 3.1) as well as ongoing improvements in vehicle emission technologies and the impact of measures in the Air Quality Action

Plan. Some inter-annual variability is also expected as a result of road works, weather patterns etc.

Table 3.1 – Traffic Flow Data (24 hour average)

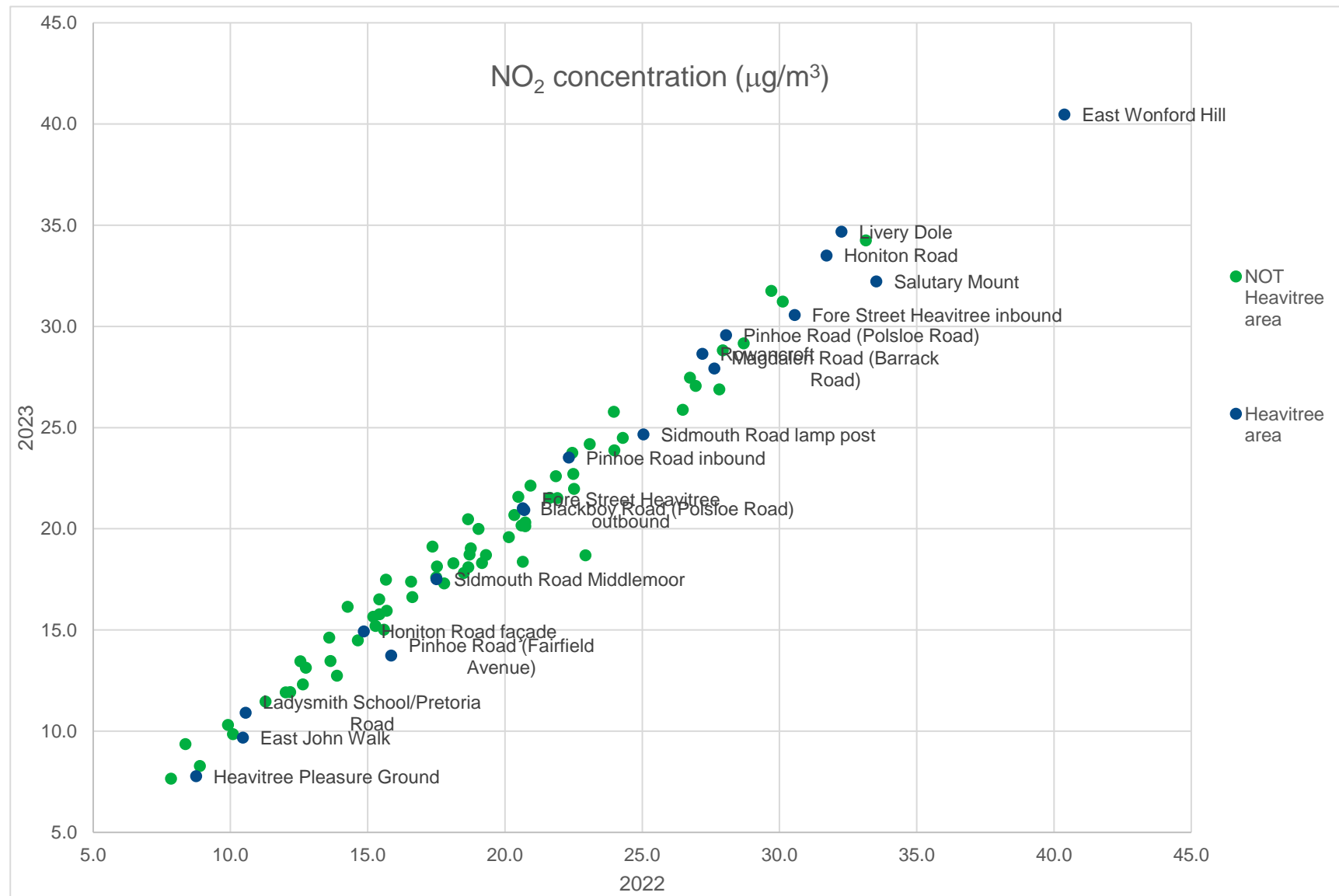
Site Name	2015	2020	2023	% change from 2015 to 2020	% change from 2015 to 2023
Pinhoe Road (Whipton)	20830	16538	18,222	-21%	-13%
Heavitree Road	17507	14832	19,027	-15%	9%
Honiton Road	26832	22789	25,312	-15%	-6%
Topsham Road (King George)	26057	20702	24,705	-21%	-5%
Alphington St	28799	22012	24,588	-24%	-15%
Cowick St	14840	10913	12,106	-26%	-18%
Total	134865	107786	123,960	-20%	-8%

Table notes:

This table shows only average WORKDAY flows, weekend flows have been excluded. This will mean that the results cannot be compared with other published 7-day traffic flows. Similarly, this report is only assessing flows and changes at these six selected locations, if different sites were chosen, different trends could appear.

In September 2023 temporary changes were made to prohibit through traffic in the Heavitree residential area. In June 2024 the HaTOC committee voted to end the trial. This only affected part of the 2023 monitoring year reported so any changes in traffic flows or nitrogen dioxide levels as a result would not be as significant as if the change had coincided with the calendar year. Figure 3.1 below shows 2023 concentrations plotted against those from 2022, with the monitoring locations that are close to Heavitree area labelled and coloured blue. Those distant from the Heavitree area are coloured green. This is not a formal assessment of the scheme, but there does not appear to be a different trend between the two sets of data. This suggests that no impact of the highway changes can be seen in the 2023 data set for the monitoring sites that could be expected to have been impacted. There will also be other factors which affect pollution levels on a year-to-year basis, so identifying the impact of the highway changes will never be straightforward. This will be reported on further in the next Annual Status Report in 2025.

Figure 3.1 – A Comparison of 2022 and 2023 Concentrations, with Monitoring Sites Close to Heavitree Identified



2020 was exceptional, in terms of the change in traffic flows, so the Council had no plans to amend the AQMA as a result of changes to NO₂ concentrations seen in that year. The last Annual Status Report (published in 2023) recommended that longer term trends were monitored to confirm which exceedences have indeed been permanently resolved. There will also always be natural variation between years as a result of local small changes in traffic flows (road works etc) and weather patterns which make identifying any trend difficult over short periods of time even where other factors are stable.

It seems highly likely that previous exceedences at the Blackboy Road / Pinhoe Road junction (DT42 and DT43) have been permanently resolved given that they had fallen below 40 µg/m³ in 2018 and therefore have been below the objective for more than 5 years. Other sites (Alphington Street DT19, Livery Dole DT52, Satutory Mount DT54, Fore Street Heavitree inbound DT56 and Honiton Road DT58) were above the objective in 2019 but have not been since. This means that there have now been four years of results that are below the objective level, two of which were affected by Covid and lockdowns.

The Council intends to amend the AQMA order and AQMA boundary as a result of these results and to co-incide with the expiry of the current AQAP at the end of 2024. The proposed timetable for this process is as follows:

Date	Actions
June 2024	Submit ASR, announcing need for amendment of AQMA (with proposed new boundary) as well as timetable for consultation and publication of new AQAP
From June 2024	Start of process to consider AQAP measures
September committee (date TBC)	ASR presented to committee for approval and start of consultation period on new AQMA order
11 weeks after committee	Consultation closes, and draft AQMA order submitted to DEFRA
From January 2025	Evaluation of potential AQAP measures
By end March 2025	New AQMA order signed and 18 month deadline for AQAP issue starts
June 2025	Submit ASR with update on progress and timetable
From June 2025	Draft AQAP
September 2025 committee (date TBC)	ASR presented to committee for approval and start of 8 week consultation period on new AQAP
8-12 weeks after committee	End of consultation (dates TBC)
By end March 2026	Consideration of consultation responses and final AQAP produced
	AQAP sent to DEFRA for approval
June 2026	Submit ASR
September 2026 committee (date TBC)	ASR presented to committee for approval and adoption of AQAP

This timetable was provided to the LAQM helpdesk on 26 September 2023. Their response was 'The timetable appears to be reasonable. Please ensure this is communicated in your next ASR, so this can be considered during the appraisal process'.

Whilst it would be desirable to publish a new AQAP immediately after the expiry of the old plan at the end of 2024 this is not possible with the timetable above. The need to first review the AQMA boundary forces the production of the new AQAP to be delayed. The AQMA boundary can only be reviewed this year because there is now at least three years of data showing that many of the former areas of exceedance have been resolved. Only once the new AQMA order has been signed can work formally begin on the new AQAP. However it is anticipated that officers will start to discuss the new plan before this. Full public consultation will be undertaken as part of the production of the plan, so those affected will have the opportunity to comment on it. An Equalities Impact Assessment is included in Appendix G.

The proposed new AQMA boundary and an explanation of how this has been derived is included in Appendix F.

There were no changes to the monitoring network in 2023. The following changes have been made for the start of 2024:

- Removal of the diffusion tube on Pinn Lane. The existing site at Pinhoe Station is more representative of worst case conditions along this road, making the Pinn Lane site redundant.
- Removal of the Northernhay Gardens diffusion tube. Data capture was historically very low here and as this was located in a city centre park some distance from relevant receptors it has not been replaced.
- Addition of two diffusion tubes close to the junction of Magdalen Street, Holloway Street, South Street and Western Way. Significant development, including changes to the road layout are proposed in this area so additional monitoring would be beneficial (although it is not anticipated that any exceedences of the objective will be identified).

The Council considers that it has good coverage of all areas where exceedences might occur at a relevant location as well as any areas which might be expected to see significant traffic growth (as a result of new development etc). Monitoring is focused at expected hot spots and relevant worst-case locations. No further revision to the monitoring network is therefore currently proposed in order to identify suspected exceedences,

although regular review of the network will continue to ensure that monitoring is taking place at all areas of potential exceedance at locations of relevant exposure.

3.2.2 Particulate Matter (PM₁₀)

Table A.6 in Appendix A: Monitoring Results compares the ratified and adjusted monitored PM₁₀ annual mean concentrations for the past five years with the air quality objective of 40µg/m³.

Table A.7 in Appendix A compares the ratified continuous monitored PM₁₀ daily mean concentrations for the past five years with the air quality objective of 50µg/m³, not to be exceeded more than 35 times per year.

There were no measured exceedences of the PM₁₀ air quality objectives in Exeter in 2023. Data capture at CM1 (RAMM) was below 75% (because of equipment breakdowns) and therefore annualisation was required. Annual average concentrations rose in 2022 and 2023 compared to the previous three years. The longer-term trend in annual concentrations is a decline since 2005 or 2006. The data will be monitored over the coming years to identify whether this recent increase is part of an emerging trend or caused by expected inter-annual variability as a result of weather patterns etc.

There were no exceedences of an hourly mean of 50µg/m³ in 2023 at either monitoring site. The 90.4th percentile of hourly results has also been calculated for RAMM (CM1) because of the low data capture. This is below 50 µg/m³.

3.2.3 Particulate Matter (PM_{2.5})

Table A.8 in Appendix A presents the ratified and adjusted monitored PM_{2.5} annual mean concentrations for the past five years.

There were no measured exceedences of the PM_{2.5} air quality objectives in Exeter in 2023. Data capture at CM1 (RAMM) was below 75% and therefore annualisation was required. There is no obvious trend in concentrations over the period when data has been collected.

3.2.4 Ozone (O₃)

Table A.9 in Appendix A compares the ratified continuous monitored O₃ 8-hour mean concentrations for the past 5 years with the air quality objective of 100µg/m³, not to be exceeded more than 10 times per year.

Although not a local air pollutant, Exeter City Council has the facility to measure ozone (O₃) levels. Table A.9 in Appendix A compares the ratified continuous monitored O₃ concentrations for 2023 with the nationally applied air quality objective for this pollutant. In 2020, the number of occasions when there was an 8 hour running mean of >100 micrograms per cubic meter increased significantly. This could have been caused by the interaction between NO_x and ozone in the atmosphere. With lower concentrations of NO being emitted during lockdowns, less ozone would be converted to oxygen (O₂). There were 8 exceedances during the part of 2023 for which monitoring data was collected. Data capture at this site was low, because of equipment replacement during the year. The relevant percentile of results has also therefore been calculated and is below 100 micrograms per cubic meter. Ozone is not a local air pollutant so Exeter City Council is not responsible for reporting on, or mitigating, exceedances of this objective. This is the responsibility of DEFRA.

Appendix A: Monitoring Results

Table A.1 – Details of Automatic Monitoring Sites

Site ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Monitoring Technique	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Inlet Height (m)
CM1	Exeter Roadside	Kerbside	291939	92830	PM10; PM2.5; NO2; O3	YES. AQMA 1	Chemiluminescent; UVA; Optical Light Scattering	0	1	1.7
CM2	Alphington Street	Roadside	291670	91773	PM10; PM2.5	YES. AQMA 1	Optical Light Scattering	12	3	1.7

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable

Table A.2 – Details of Non-Automatic Monitoring Sites

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT1	High Street /Castle Street	Kerbside	292199	92814	NO2	YES, Exeter AQMA	50.0	0.5	No	2.0
DT2	Longbrook Street	Kerbside	292315	93016	NO2	NO	0.0	1.0	No	1.7
DT3	New North Road	Kerbside	292185	93049	NO2	YES, Exeter AQMA	0.0	1.0	No	2.0
DT4	Queen Street	Roadside	291779	93011	NO2	YES, Exeter AQMA	0.0	1.5	No	2.0
DT5, DT6	RAMM 2	Kerbside	291984	92626	NO2	YES, Exeter AQMA	0.0	1.0	Yes	1.7
DT7	High Street Guildhall	Roadside	291895	92569	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT8	North Street	Kerbside	291943	92511	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT9	South Street	Roadside	291833	92433	NO2	YES, Exeter AQMA	4.0	2.5	No	2.0
DT10	Market Street	Kerbside	292291	92292	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT11	Magdalen Street	Roadside	292422	92320	NO2	YES, Exeter AQMA	6.0	2.0	No	1.7
DT12	Magdalen Street façade	Kerbside	292590	92743	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT13	Archibald Road	Roadside	292832	92731	NO2	NO	0.0	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT14	Heavitree Road inbound	Roadside	292703	92807	NO2	YES, Exeter AQMA	0.0	10.0	No	2.0
DT15	Heavitree Road outbound	Kerbside	292378	92039	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT16	Holloway Street	Kerbside	291699	92091	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT17	Carder's Court, Shilhay	Roadside	291657	91973	NO2	NO	0.0	15.0	No	1.7
DT18	Rear of Gervase Avenue	Roadside	291669	91812	NO2	YES, Exeter AQMA	5.0	18.0	No	2.0
DT19	Alphington Street	Kerbside	291532	91349	NO2	YES, Exeter AQMA	0.0	1.0	No	2.0
DT20	Alphington Road inbound	Roadside	291460	91390	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT21	Queen's Road	Urban Background	291509	91151	NO2	NO	8.0	2.0	No	1.7
DT22	Alphington Road outbound	Roadside	291518	90813	NO2	YES, Exeter AQMA	0.0	8.0	No	1.7
DT23	Alphington Road outer	Roadside	291691	90425	NO2	YES, Exeter AQMA	15.0	2.0	No	1.7
DT24	Church Road Alphington	Roadside	291767	90160	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT25	Church Road II	Kerbside	291520	90531	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT26	Alphington Cross	Roadside	290864	91725	NO2	YES, Exeter AQMA	0.0	1.8	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT27	Cowick Street (Cowick Lane)	Kerbside	291249	91874	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT28	Cowick Street (inbound)	Roadside	291376	91944	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT29	Cowick Street (outbound)	Roadside	291500	92055	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT30	Cowick Street (Exe Bridges)	Roadside	291351	92169	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT31	Okehampton Street	Roadside	290826	93598	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT32	Station Road	Roadside	291253	93299	NO2	NO	0.0	2.1	No	1.7
DT33	Bonhay Road (St Clements Lane)	Roadside	291242	93483	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT34	Red Cow Village	Kerbside	291272	93468	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT35	Red Cow II	Kerbside	291054	94399	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT36	Cowley Bridge Road	Roadside	292391	93291	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT37	Pennsylvania Road	Kerbside	292469	93245	NO2	NO	0.0	1.0	No	1.7
DT38	York Road School	Roadside	292579	93146	NO2	NO	3.5	2.5	No	1.7
DT39	York Road	Kerbside	293047	93877	NO2	NO	1.5	0.1	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT40	Union Road	Roadside	293405	93395	NO2	NO	0.0	1.0	No	1.7
DT41	Pinhoe Road inbound	Roadside	293251	93375	NO2	YES, Exeter AQMA	0.0	3.0	No	1.7
DT42	Pinhoe Road (Polsloe Road)	Kerbside	293227	93356	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT43	Blackboy Road (Polsloe Road)	Roadside	295068	94487	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT44	Beacon Heath	Kerbside	295888	94101	NO2	NO	10.0	1.0	No	1.7
DT45	Venny Bridge	Kerbside	296418	94470	NO2	NO	8.0	1.0	No	1.7
DT46	Pinhoe	Kerbside	296984	94327	NO2	NO	20.0	0.1	No	1.7
DT47	Langaton Lane	Urban Background	296494	93782	NO2	NO	12.0	0.5	No	1.7
DT48	Pinn Lane	Roadside	295413	93689	NO2	NO	9.5	1.0	No	2.0
DT49	Pinhoe Road (Fairfield Avenue)	Roadside	293091	92825	NO2	YES, Exeter AQMA	0.0	5.0	No	1.7
DT50	East John Walk	Urban Background	293448	92419	NO2	NO	1.5	N/A	No	1.7
DT51	Magdalen Road (Barrack Road)	Kerbside	293418	92497	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT52	Livery Dole	Roadside	293533	92473	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT53	Rowancroft	Kerbside	293738	92396	NO2	YES, Exeter AQMA	0.0	0.2	No	2.0
DT54	Salutory Mount	Roadside	293781	92409	NO2	YES, Exeter AQMA	4.5	1.5	No	1.7
DT55	Fore Street Heavitree outbound	Roadside	294043	92359	NO2	YES, Exeter AQMA	6.0	4.0	No	1.7
DT56	Fore Street Heavitree inbound	Roadside	294410	92310	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT57	East Wonford Hill	Roadside	295203	92378	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT58	Honiton Road	Roadside	295191	92395	NO2	YES, Exeter AQMA	20.0	1.5	No	2.0
DT59	Honiton Road façade	Roadside	295466	92365	NO2	NO	0.0	15.0	No	1.7
DT60	Sidmouth Road lamp post	Roadside	295636	92232	NO2	YES, Exeter AQMA	7.0	2.0	No	2.0
DT61	Sidmouth Road Middlemoor	Roadside	295710	90571	NO2	YES, Exeter AQMA	0.0	10.0	No	1.7
DT62	Newcourt Way	Roadside	294694	90001	NO2	NO	17.0	2.0	No	2.0
DT63	Topsham Road (Countess Wear)	Roadside	294652	89974	NO2	YES, Exeter AQMA	0.0	5.0	No	2.0
DT64	Bridge Road (Countess Wear)	Roadside	296415	88477	NO2	NO	0.0	15.0	No	1.7
DT65	High Street Topsham	Kerbside	294227	90435	NO2	NO	0.0	1.0	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT66	Topsham Road (Tollards Road)	Roadside	293213	91245	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT67	Topsham Road (Barrack Road)	Roadside	292291	91678	NO2	YES, Exeter AQMA	0.0	10.0	No	1.7
DT68	Riverside Valley Park	Urban Background	291016	91304	NO2	NO	n/a	N/A	No	2.0
DT69	Cowick Barton Playing Fields	Urban Background	291298	92593	NO2	NO	n/a	N/A	No	1.7
DT70	Exwick Playing Fields	Urban Background	294387	92611	NO2	NO	n/a	N/A	No	2.0
DT71	Heavitree Pleasure Ground	Urban Background	293617	93090	NO2	NO	n/a	N/A	No	2.0
DT72	Ladysmith School/Pretoria Road	Roadside	293052	94185	NO2	NO	1.5	1.5	No	1.7
DT73	Pennsylvania	Urban Background	292056	93043	NO2	NO	6.0	2.0	No	2.0
DT74	Northernhay Gardens	Urban Background	291721	89727	NO2	NO	n/a	N/A	No	2.0
DT75	Chudleigh Road	Roadside	291555	90449	NO2	YES, Exeter AQMA	0.0	4.0	No	2.0
DT76	Mill Lane	Urban Background	292553	93082	NO2	NO	8.5	1.0	No	2.0
DT77	Sidwell Street	Kerbside	296415	94165	NO2	YES, Exeter AQMA	6.0	1.0	No	2.0
DT78	Station Road Pinhoe	Other	296827	93886	NO2	NO	1.5	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT79	Tithebarn Link Road	Roadside	295967	88876	NO2	NO	2.0	2.0	No	2.0
DT80	Exeter Road	Roadside	292637	91991	NO2	NO	14.5	3.0	No	2.0
DT81	St. Leonards Road	Roadside	292847	92911	NO2	NO	0.0	2.0	No	1.7
DT82	Newtown	Urban Background	291655	92258	NO2	NO	0.0	3.5	No	2.0
DT83	New Bridge St	Roadside	291897	92217	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT84	Lower Coombe St	Roadside	291375	92935	NO2	NO	2.0	10.0	No	1.7
DT85	Bonhay Road bridge	Roadside	291375	92935	NO2	YES, Exeter AQMA	3.0	2.0	No	1.7

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable (nb sites DT68-71 and DT74 are located in public open space, intentionally distant from roads but also distant from relevant receptors, DT50 is located on a traffic free residential street)

Table A.3 – Annual Mean NO₂ Monitoring Results: Automatic Monitoring (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
CM1	291939	92830	Kerbside		76	29	18.8	19.2	17.9	16.4 (16.4)

☒ Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22 (the annualised result is shown in brackets)

☒ Reported concentrations are those at the location of the monitoring site (annualised, as required), i.e. prior to any fall-off with distance correction

☒ Where exceedances of the NO₂ annual mean objective occur at locations not representative of relevant exposure, the fall-off with distance concentration has been calculated and reported concentration provided in brackets for 2023

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.4 – Annual Mean NO₂ Monitoring Results: Non-Automatic Monitoring (µg/m³)

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT1	292199	92814	Kerbside		100.0	26.5	17.0	20.9	15.7	17.5
DT2	292315	93016	Kerbside		100.0	26.4	17.5	21.4	19.0	20.0
DT3	292185	93049	Kerbside		92.3	27.8	18.8	22.6	20.1	19.6
DT4	291779	93011	Roadside		90.4	23.8	16.2	19.0	16.6	17.4
DT5, DT6	291984	92626	Kerbside		100.0	27.5	18.5	21.3	17.8	17.3
DT7	291895	92569	Roadside		100.0	22.6	15.7	20.4	18.1	18.3
DT8	291943	92511	Kerbside		82.7	35.7	22.6	27.9	24.0	23.9
DT9	291833	92433	Roadside		100.0	28.5	18.7	24.2	20.6	20.2
DT10	292291	92292	Kerbside		100.0	29.5	18.6	23.4	20.7	20.1
DT11	292422	92320	Roadside		100.0	28.9	19.5	24.7	22.5	22.0
DT12	292590	92743	Kerbside		100.0	29.3	20.0	23.8	22.9	18.7
DT13	292832	92731	Roadside		90.4	19.6	13.2	16.8	15.2	15.7

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT14	292703	92807	Roadside		100.0	19.0	13.2	16.5	14.6	14.5
DT15	292378	92039	Kerbside		100.0	31.4	22.3	28.0	24.0	25.8
DT16	291699	92091	Kerbside		100.0	29.3	21.3	26.6	21.9	21.5
DT17	291657	91973	Roadside		100.0	21.4	15.5	18.3	15.7	15.9
DT18	291669	91812	Roadside		92.3	22.7	15.8	19.2	17.5	17.6
DT19	291532	91349	Kerbside		100.0	42.0	28.5	35.7	33.1	34.3
DT20	291460	91390	Roadside		100.0	31.3	22.4	27.4	24.3	24.5
DT21	291509	91151	Urban Background		100.0	12.7	9.1	11.7	10.1	9.9
DT22	291518	90813	Roadside		100.0	26.2	17.7	21.2	20.6	18.4
DT23	291691	90425	Roadside		92.3	23.4	15.3	20.6	18.7	18.1
DT24	291767	90160	Roadside		100.0	23.4	18.3	24.3	18.5	17.8
DT25	291520	90531	Kerbside		92.3	23.5	16.2	19.8	20.9	22.1
DT26	290864	91725	Roadside		100.0	30.2	20.4	25.6	22.5	23.8
DT27	291249	91874	Kerbside		100.0	38.7	26.8	31.6	30.1	31.2

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT28	291376	91944	Roadside		92.3	21.1	15.6	19.9	17.5	18.1
DT29	291500	92055	Roadside		100.0	34.4	24.3	29.8	28.7	29.2
DT30	291351	92169	Roadside		90.4	30.1	22.1	28.2	26.7	27.5
DT31	290826	93598	Roadside		100.0	24.3	17.3	20.6	18.7	19.0
DT32	291253	93299	Roadside		100.0	25.4	17.7	21.2	20.3	20.7
DT33	291242	93483	Roadside		100.0	26.8	19.2	24.7	21.8	22.6
DT34	291272	93468	Kerbside		100.0	36.0	26.5	32.1	29.7	31.7
DT35	291054	94399	Kerbside		92.9	31.1	21.5	26.0	23.1	24.2
DT36	292391	93291	Roadside		100.0	32.5	22.9	27.5	26.5	25.9
DT37	292469	93245	Kerbside		100.0	28.4	18.3	23.2	21.6	21.5
DT38	292579	93146	Roadside		100.0	27.7	18.1	23.0	20.7	20.3
DT39	293047	93877	Kerbside		100.0	36.2	23.3	31.2	27.8	26.9
DT40	293405	93395	Roadside		100.0	26.4	16.7	21.0	19.3	18.7
DT41	293251	93375	Roadside		100.0	29.8	20.9	24.0	22.3	23.5

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT42	293227	93356	Kerbside		100.0	35.9	25.6	30.6	28.0	29.6
DT43	295068	94487	Roadside		100.0	25.7	19.2	23.5	20.6	21.0
DT44	295888	94101	Kerbside		100.0	17.8	13.6	15.1	13.6	14.6
DT45	296418	94470	Kerbside		90.4	18.0	14.2	16.6	15.3	15.2
DT46	296984	94327	Kerbside		100.0	23.1	18.4	21.8	18.6	20.5
DT47	296494	93782	Urban Background		92.3	17.9	13.3	15.1	12.7	13.1
DT48	295413	93689	Roadside		100.0	17.6	12.8	15.5	14.3	16.2
DT49	293091	92825	Roadside		100.0	17.9	12.6	15.8	15.9	13.7
DT50	293448	92419	Urban Background		100.0	14.0	9.7	11.6	10.4	9.7
DT51	293418	92497	Kerbside		100.0	35.5	24.3	29.4	27.6	27.9
DT52	293533	92473	Roadside		100.0	42.6	31.1	34.9	32.3	34.7
DT53	293738	92396	Kerbside		100.0	38.5	27.4	32.1	27.2	28.6
DT54	293781	92409	Roadside		100.0	43.4	32.7	37.3	33.5	32.2
DT55	294043	92359	Roadside		100.0	26.7	19.8	23.4	20.7	20.9

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT56	294410	92310	Roadside		100.0	40.3	29.0	32.2	30.5	30.6
DT57	295203	92378	Roadside		100.0	53.5	38.2	42.2	40.4	40.5
DT58	295191	92395	Roadside		100.0	47.3	33.2	35.4	31.7	33.5
DT59	295466	92365	Roadside		100.0	20.4	14.8	16.0	14.9	14.9
DT60	295636	92232	Roadside		100.0	30.7	23.5	26.8	25.0	24.7
DT61	295710	90571	Roadside		92.3	21.8	15.5	19.2	17.5	17.5
DT62	294694	90001	Roadside		100.0	16.3	11.5	14.7	13.6	13.5
DT63	294652	89974	Roadside		100.0	25.4	18.1	20.7	17.4	19.1
DT64	296415	88477	Roadside		75.0	20.6	17.8	16.9	15.6	15.0
DT65	294227	90435	Kerbside		100.0	24.4	17.2	22.1	18.7	18.7
DT66	293213	91245	Roadside		100.0	36.4	25.0	30.0	27.9	28.8
DT67	292291	91678	Roadside		100.0	21.5	15.9	19.1	19.2	18.3
DT68	291016	91304	Urban Background		84.6	13.8	9.4	11.7	9.9	10.3
DT69	291298	92593	Urban Background		92.3	11.2	7.6	9.3	8.9	8.3

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT70	294387	92611	Urban Background		84.6	16.1	12.3	15.9	13.9	12.7
DT71	293617	93090	Urban Background		100.0	10.5	7.6	9.1	8.7	7.8
DT72	293052	94185	Roadside		100.0	14.2	10.6	12.2	10.5	10.9
DT73	292056	93043	Urban Background		100.0	10.2	7.5	8.3	7.8	7.6
DT74	291721	89727	Urban Background		84.1	11.4	8.3	10.7	8.4	9.4
DT75	291555	90449	Roadside		100.0	15.8	11.1	13.7	12.6	12.3
DT76	292553	93082	Urban Background		100.0	14.7	9.6	12.3	11.3	11.5
DT77	296415	94165	Kerbside		100.0	31.1	18.6	23.8	20.5	21.6
DT78	296827	93886	Other		90.4	15.1	10.6	13.4	12.5	13.5
DT79	295967	88876	Roadside		100.0	19.5	14.5	17.3	15.4	15.8
DT80	292637	91991	Roadside		100.0	19.8	14.3	16.4	16.6	16.6
DT81	292847	92911	Roadside		100.0	15.6	11.2	13.9	12.2	11.9
DT82	291655	92258	Urban Background		100.0		10.8	12.6	12.0	11.9
DT83	291897	92217	Roadside		80.8		19.5	24.0	22.5	22.7

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
DT84	291375	92935	Roadside		90.4		15.5	18.6	15.4	16.5
DT85	291375	92935	Roadside		100.0				26.9	27.1

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22

Diffusion tube data has been bias adjusted

Reported concentrations are those at the location of the monitoring site (bias adjusted and annualised, as required), i.e. prior to any fall-off with distance correction

Notes:

The annual mean concentrations are presented as $\mu\text{g}/\text{m}^3$.

Exceedances of the NO₂ annual mean objective of $40\mu\text{g}/\text{m}^3$ are shown in **bold**.

NO₂ annual means exceeding $60\mu\text{g}/\text{m}^3$, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

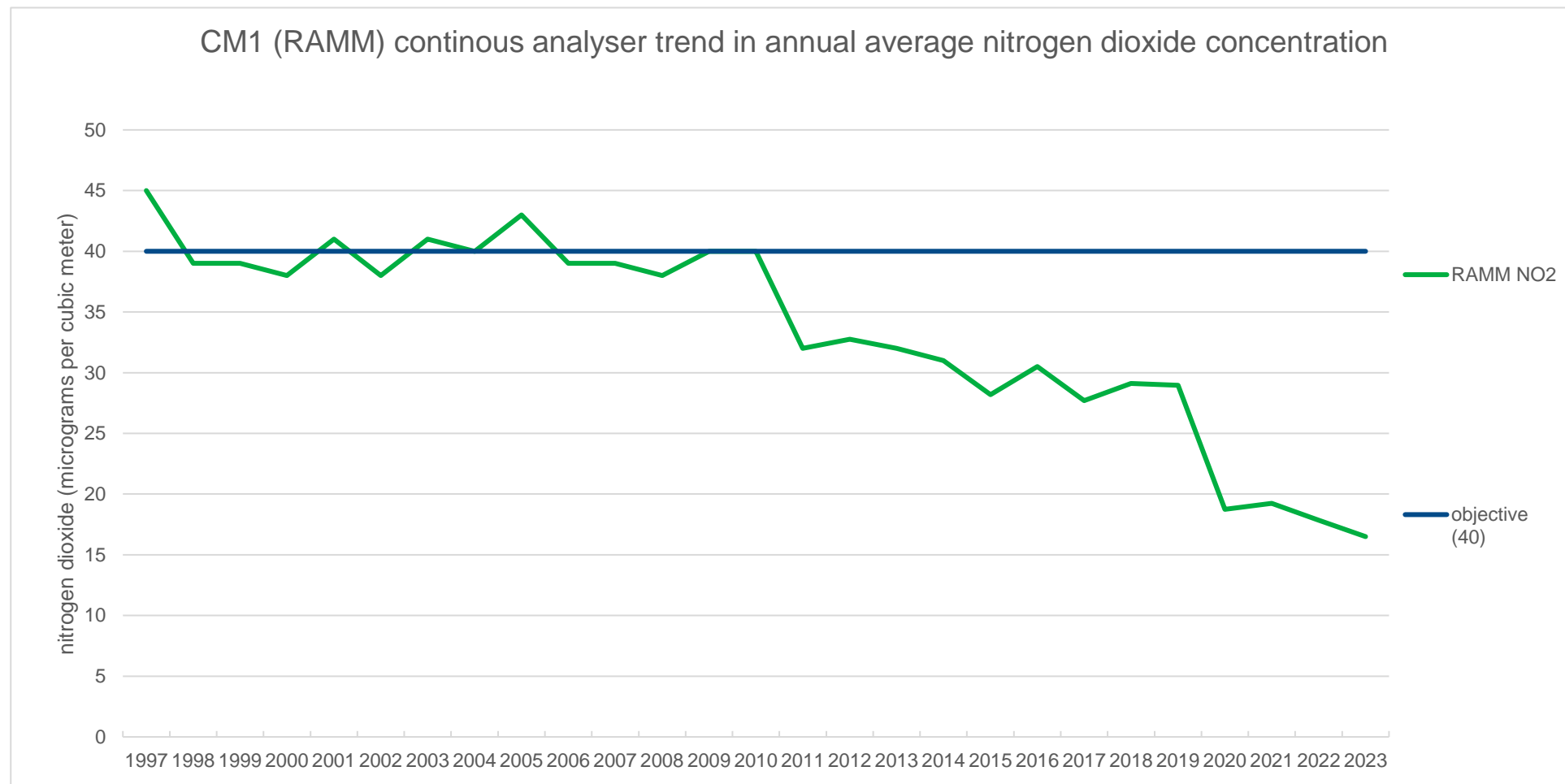
Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

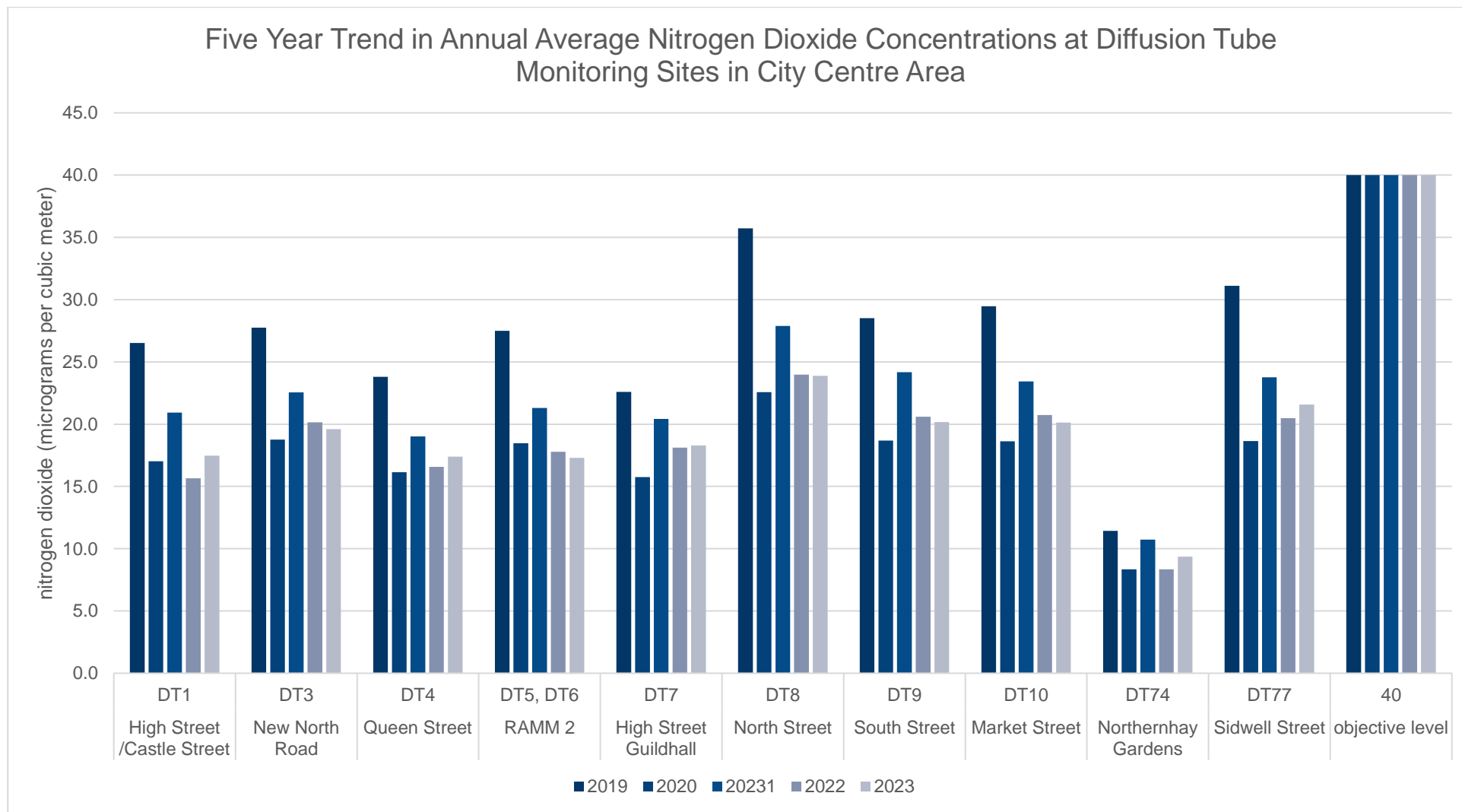
(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

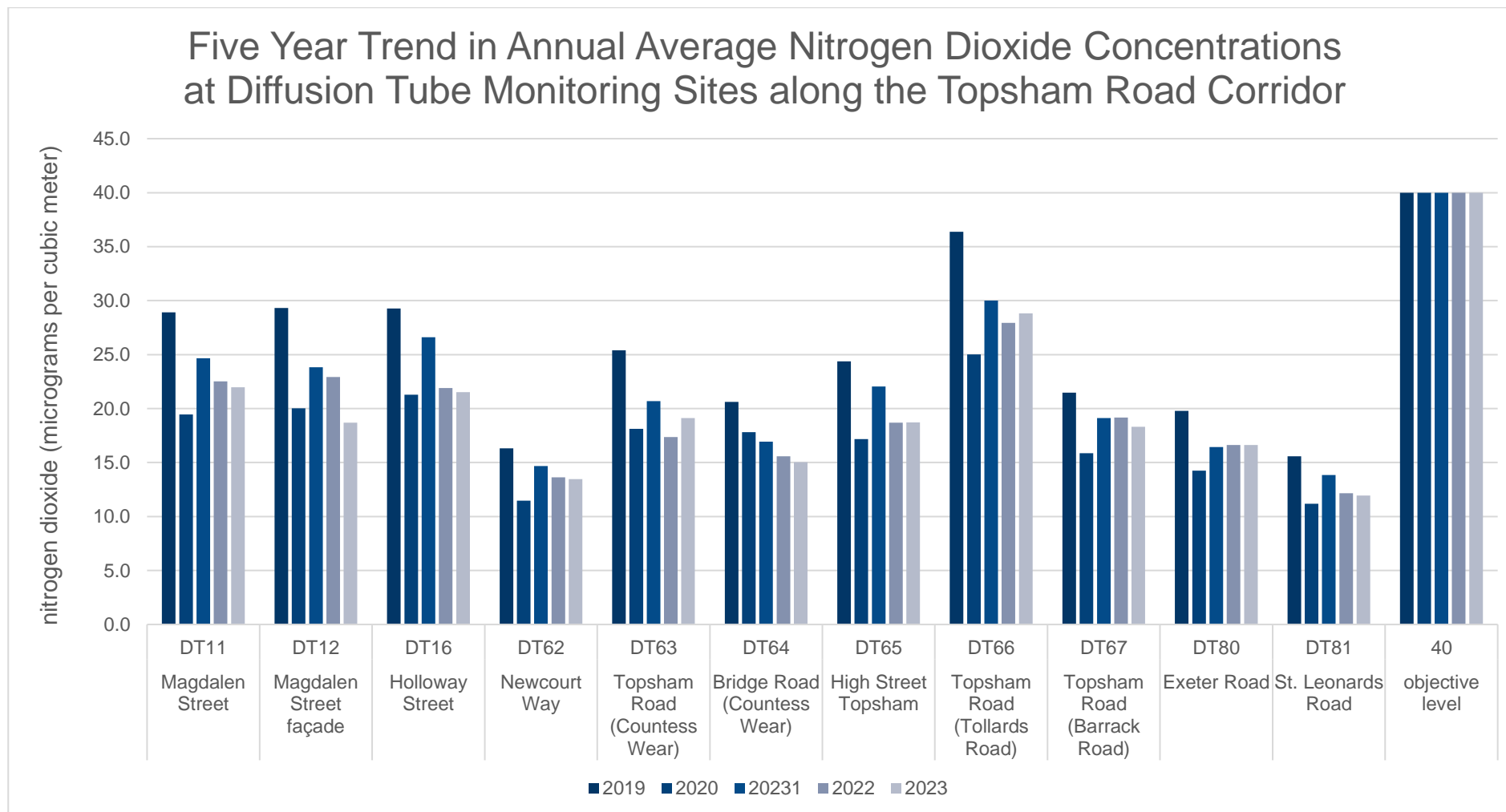
Figure A.2 – Trends in Annual Mean NO₂ Concentrations



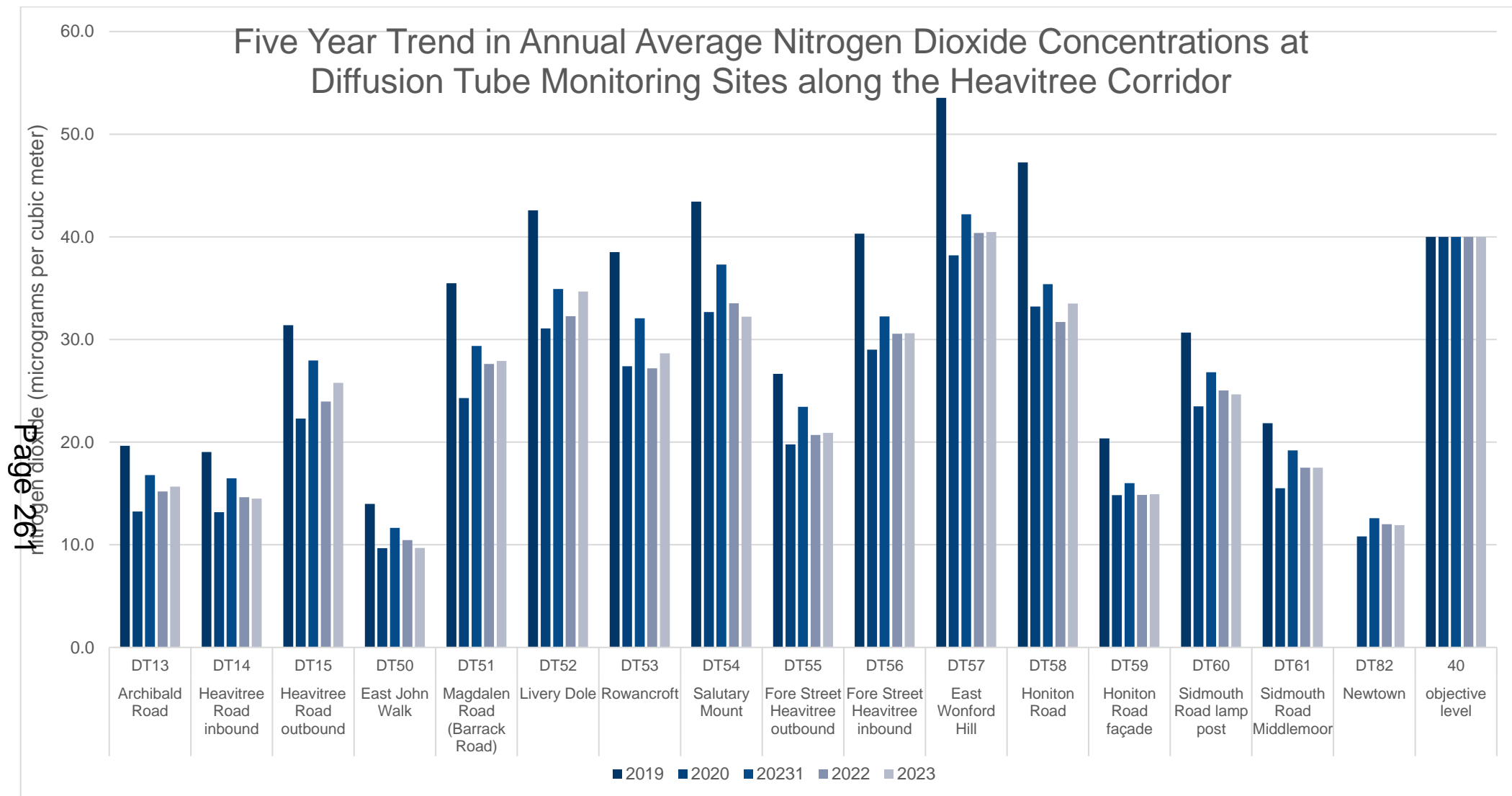
This figure presents NO₂ annual mean concentrations at the RAMM continuous monitoring site between years 1997 and 2023. There are no exceedances of the annual mean objective in 2023. There is a general trend of reduction since 2010.



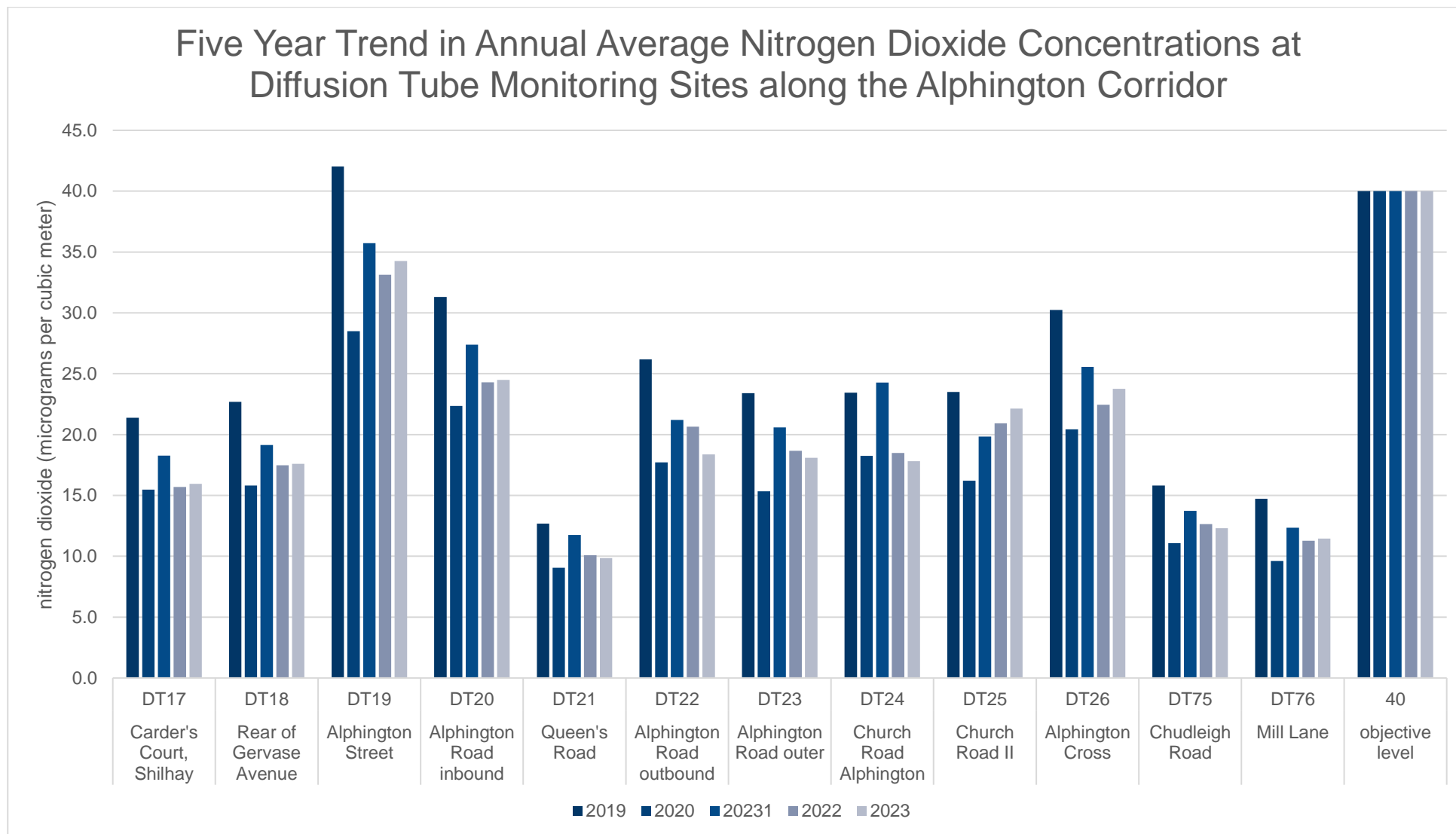
This figure presents NO₂ annual mean concentrations for sites in the city centre between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.



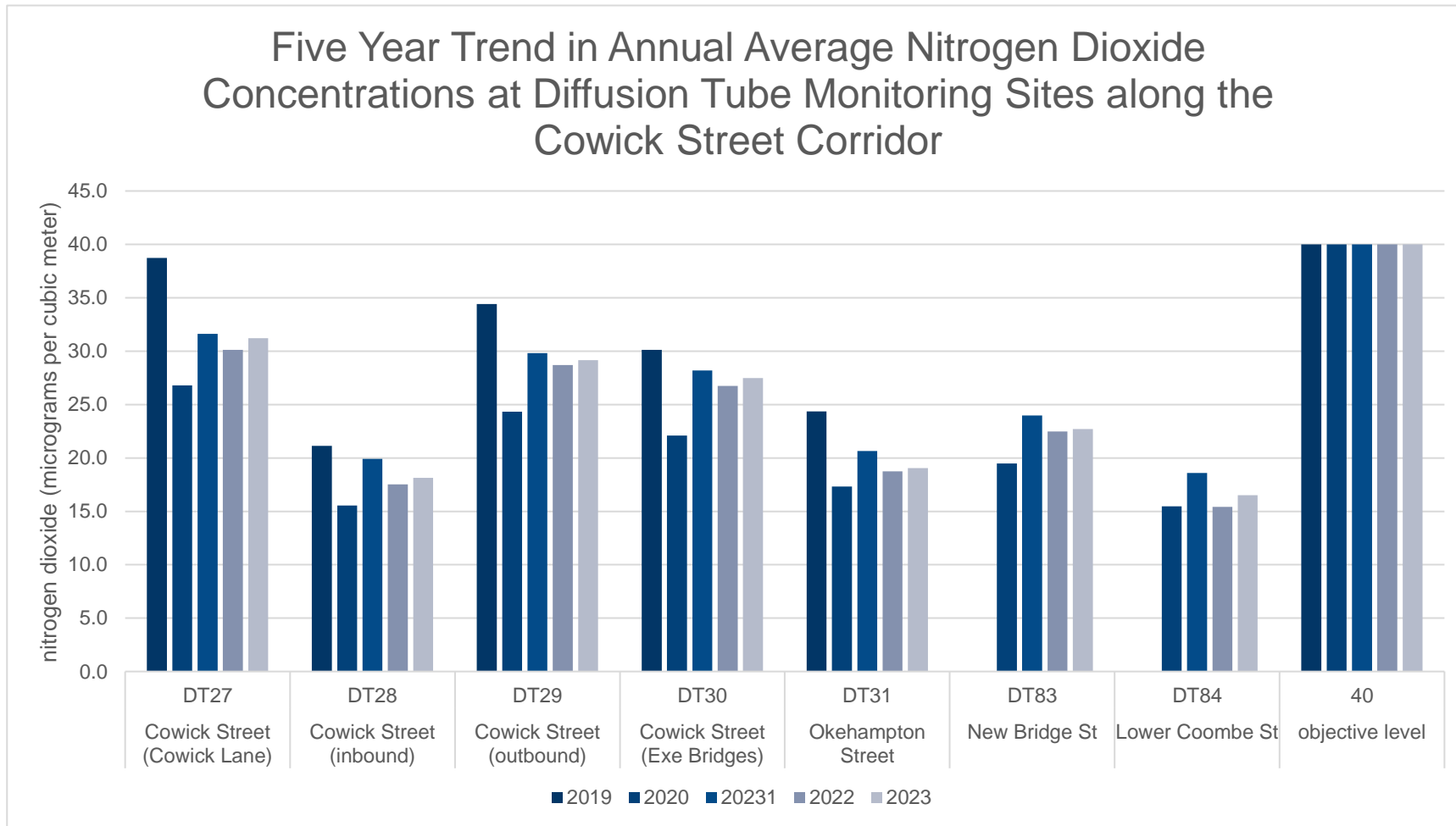
This figure presents NO₂ annual mean concentrations for sites along the Topsham Road corridor between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites along the Heavitree corridor between years 2019 to 2023. There is one exceedance of the annual mean objective in 2023 at DT57 (East Wonford Hill) and there is a general trend of reduction across the sites.

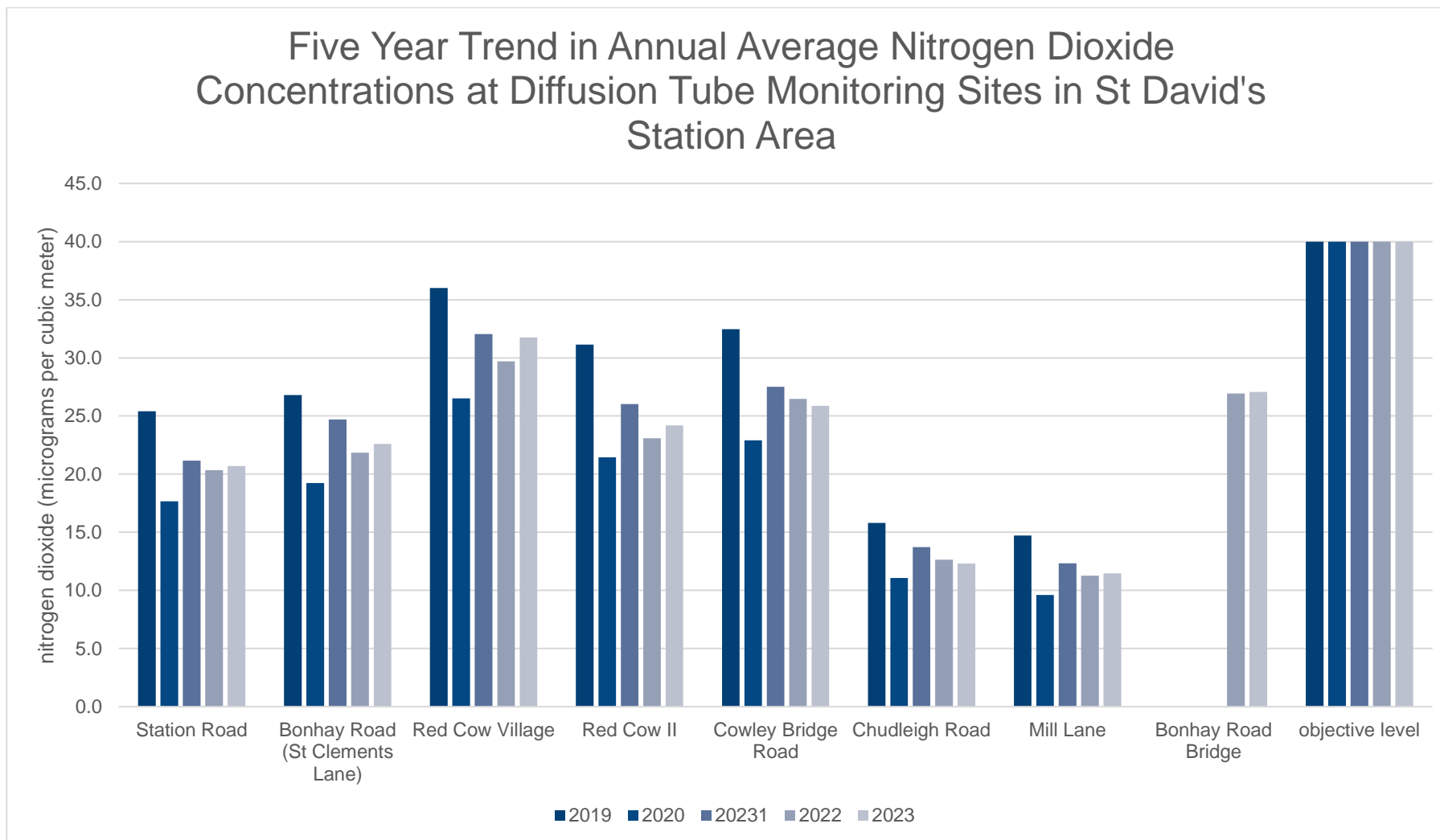


This figure presents NO₂ annual mean concentrations for sites along the Alphington corridor between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.

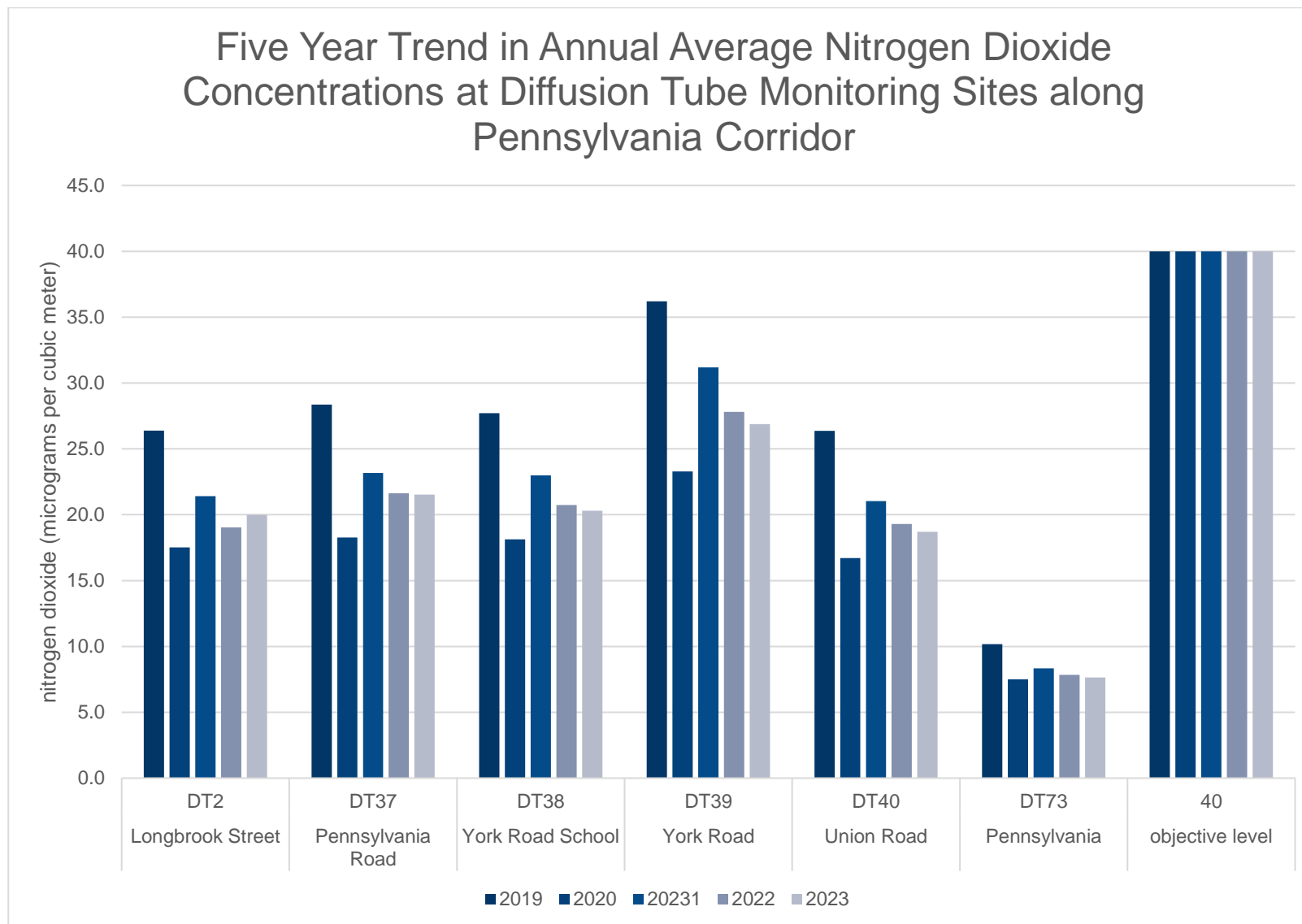


This figure presents NO₂ annual mean concentrations for sites along the Cowick Street corridor between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.

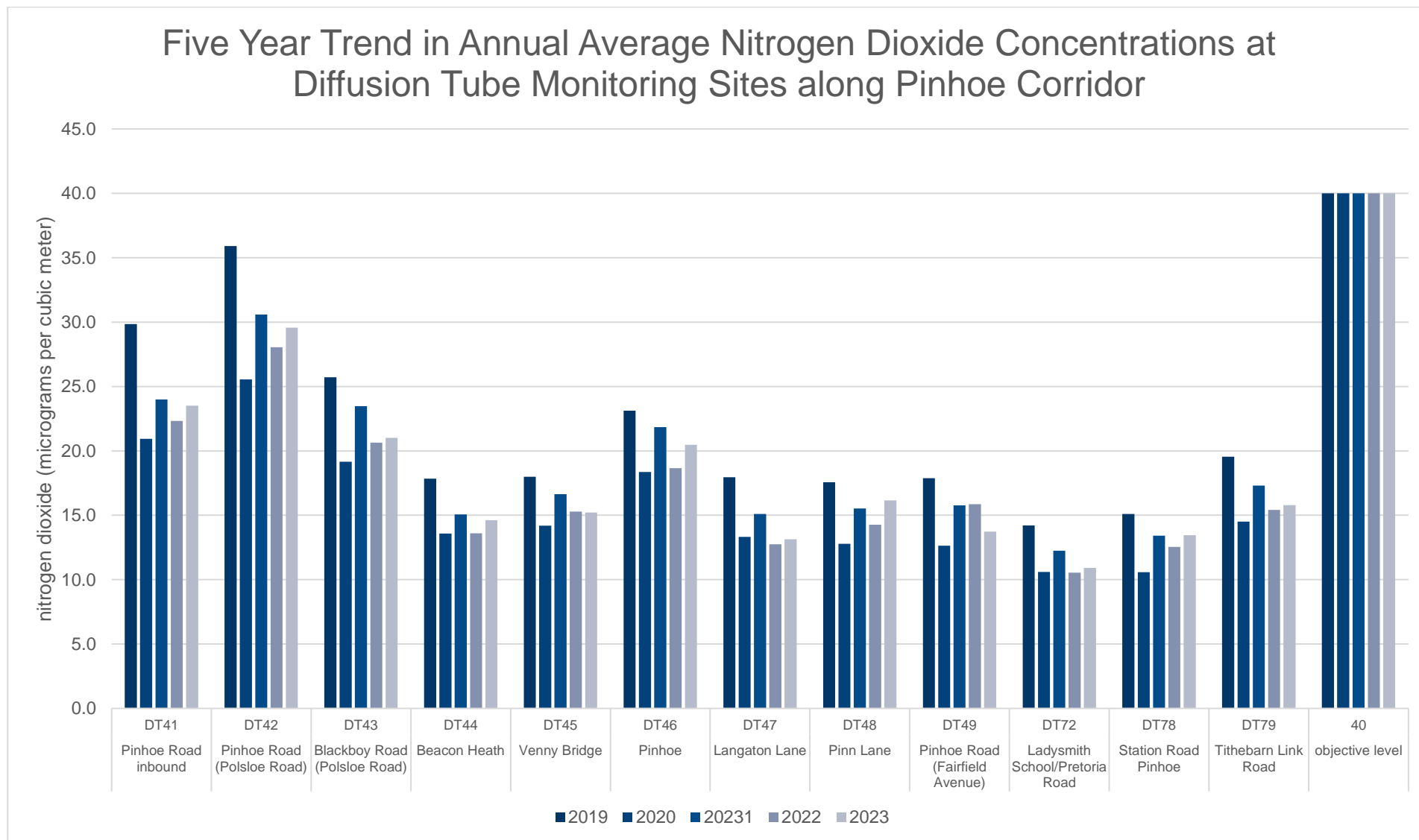
Five Year Trend in Annual Average Nitrogen Dioxide Concentrations at Diffusion Tube Monitoring Sites in St David's Station Area



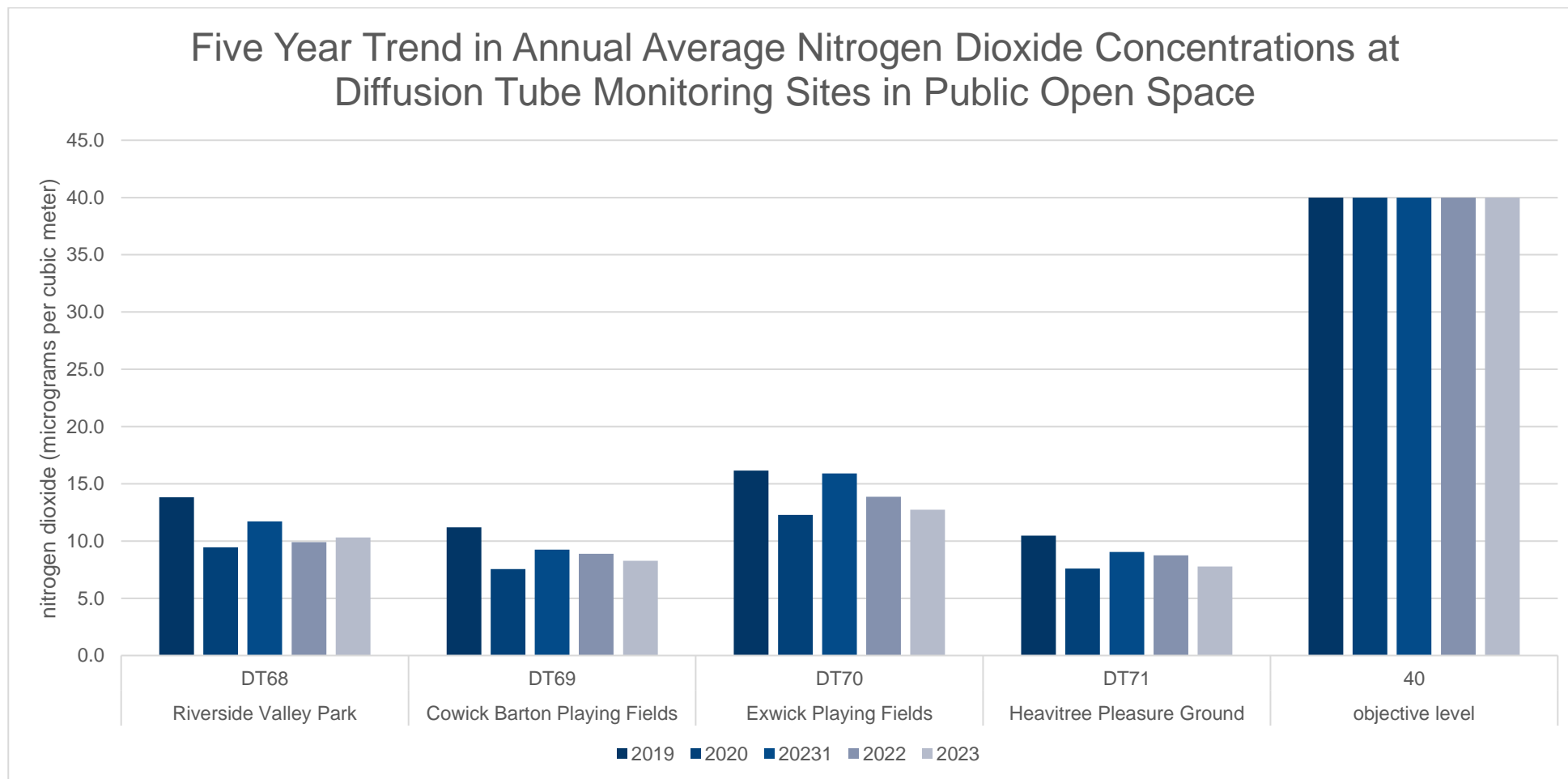
This figure presents NO₂ annual mean concentrations for sites in the St David's area between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites in the Pennsylvania area between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites along the Pinhoe corridor between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites in public open space between years 2019 to 2023. There are no exceedances of the annual mean objective in 2023 and there is a general trend of reduction experienced across the sites.

Table A.5 – 1-Hour Mean NO₂ Monitoring Results, Number of 1-Hour Means > 200µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
CM1	291939	92830	Kerbside		76	0	0	0	0	0 (63.3)

Notes:

Results are presented as the number of 1-hour periods where concentrations greater than 200µg/m³ have been recorded.

Exceedances of the NO₂ 1-hour mean objective (200µg/m³ not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.6 – Annual Mean PM₁₀ Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
CM1	29193	92830	Kerbside		45.5	15.8	14.1	13.9	17.1 (19.22)	18.8 (20.1)
CM2	291670	91773	Roadside		100	15.1	11.5	12	14.7	15.2

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22

Notes:

The annual mean concentrations are presented as µg/m³.

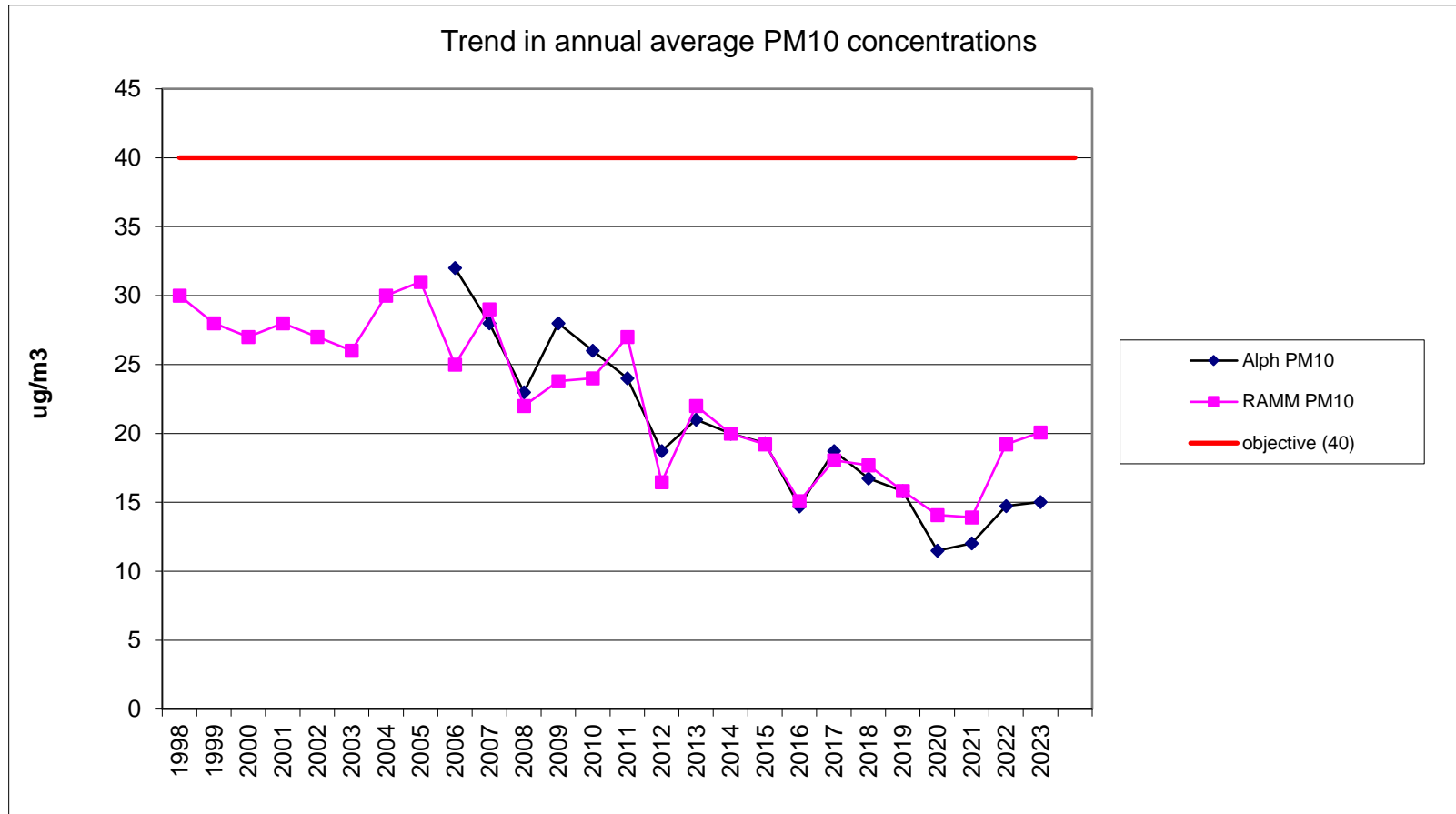
Exceedances of the PM₁₀ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.(annualised results are shown in brackets)

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Figure A.3 – Trends in Annual Mean PM₁₀ Concentrations



This figure presents PM₁₀ annual mean concentrations for the two monitoring sites in Exeter between years 1998 and 2023. There are no exceedances of the annual mean objective in 2023 although concentrations have increased since 2021. Otherwise there is a general trend of reduction experienced across both sites.

Table A.7 – 24-Hour Mean PM₁₀ Monitoring Results, Number of PM₁₀ 24-Hour Means > 50µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
CM1	29193	92830	Kerbside		45.5	0 (21.2)	1	1	2 (29.9)	0 (30.3)
CM2	291670	91773	Roadside		100	4	0 (19.2)	0	1	0

Notes:

Results are presented as the number of 24-hour periods where daily mean concentrations greater than 50µg/m³ have been recorded.

Exceedances of the PM₁₀ 24-hour mean objective (50µg/m³ not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4th percentile of 24-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.8 – Annual Mean PM_{2.5} Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019	2020	2021	2022	2023
CM1	29193	92830	Kerbside		45.5	10	8.6	8.4	11.1 (12.69)	13.2
CM2	291670	91773	Roadside		99.9	9.5	6.8	7.5	9	8.8

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22

Notes:

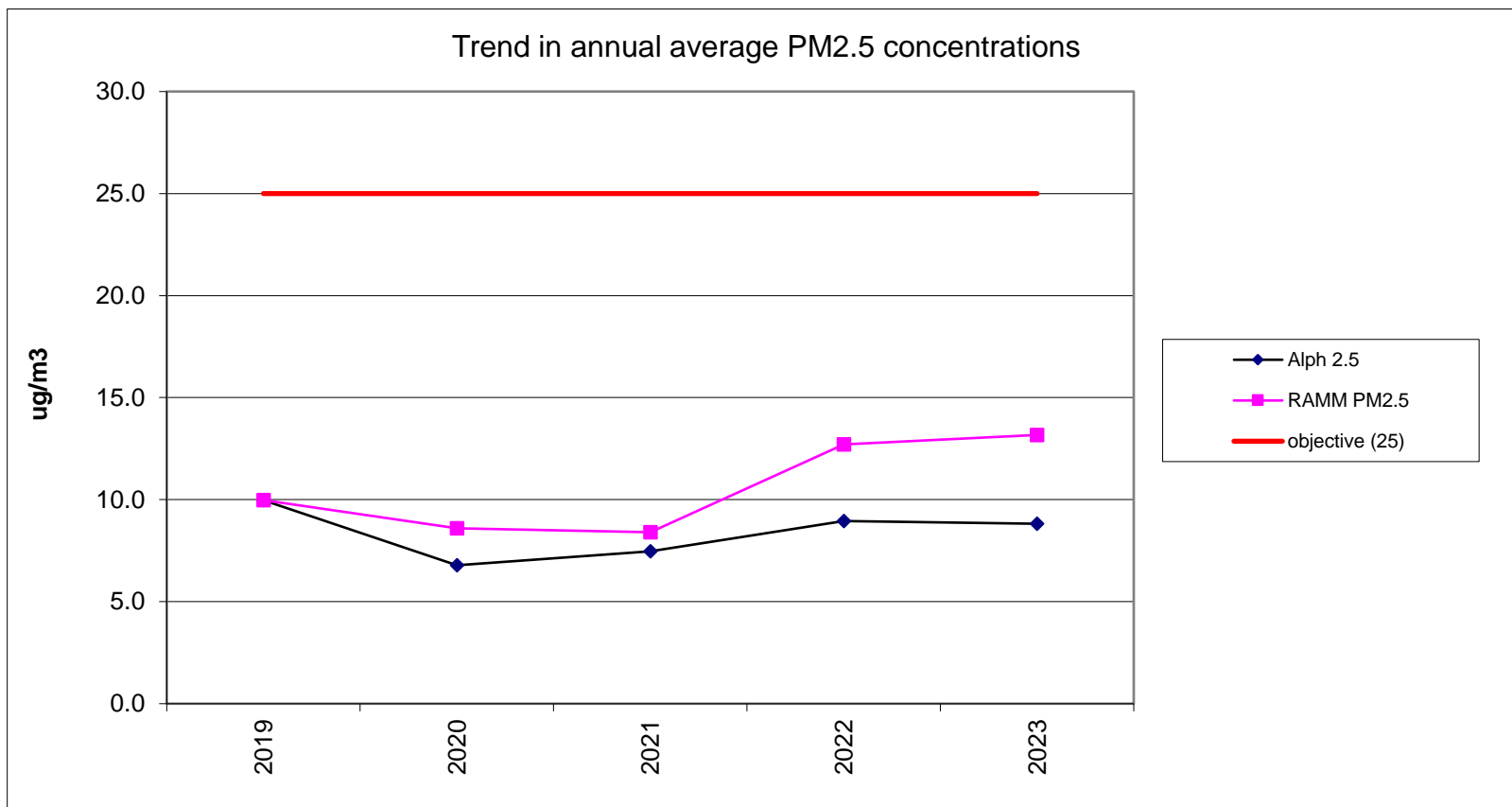
The annual mean concentrations are presented as µg/m³.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details. (annualised results have been shown in brackets)

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Figure A.4 – Trends in Annual Mean PM_{2.5} Concentrations



This figure presents PM_{2.5} annual mean concentrations for the two monitoring sites in Exeter between years 2019 and 2023. There are no exceedances of the annual mean objective in 2023 although concentrations have increased since 2021. There is no clear trend over the five year period.

Table A.9 – O₃ 2023 Monitoring Results, Number of Relevant Instances

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2023 (%) ⁽²⁾	2019 O ₃ 8-hour mean > 100 (µg/m ³)	2020 O ₃ 8-hour mean > 100 (µg/m ³)	2021 O ₃ 8-hour mean > 100 (µg/m ³)	2022 O ₃ 8-hour mean > 100 (µg/m ³)	2023 O ₃ 8-hour mean > 100 (µg/m ³)
CM1	291939	92830	Kerbside		60	11	87	0	0	8 (74.6)

Notes:

Results are presented as the number of instances where monitored concentrations are greater than the objective concentration.

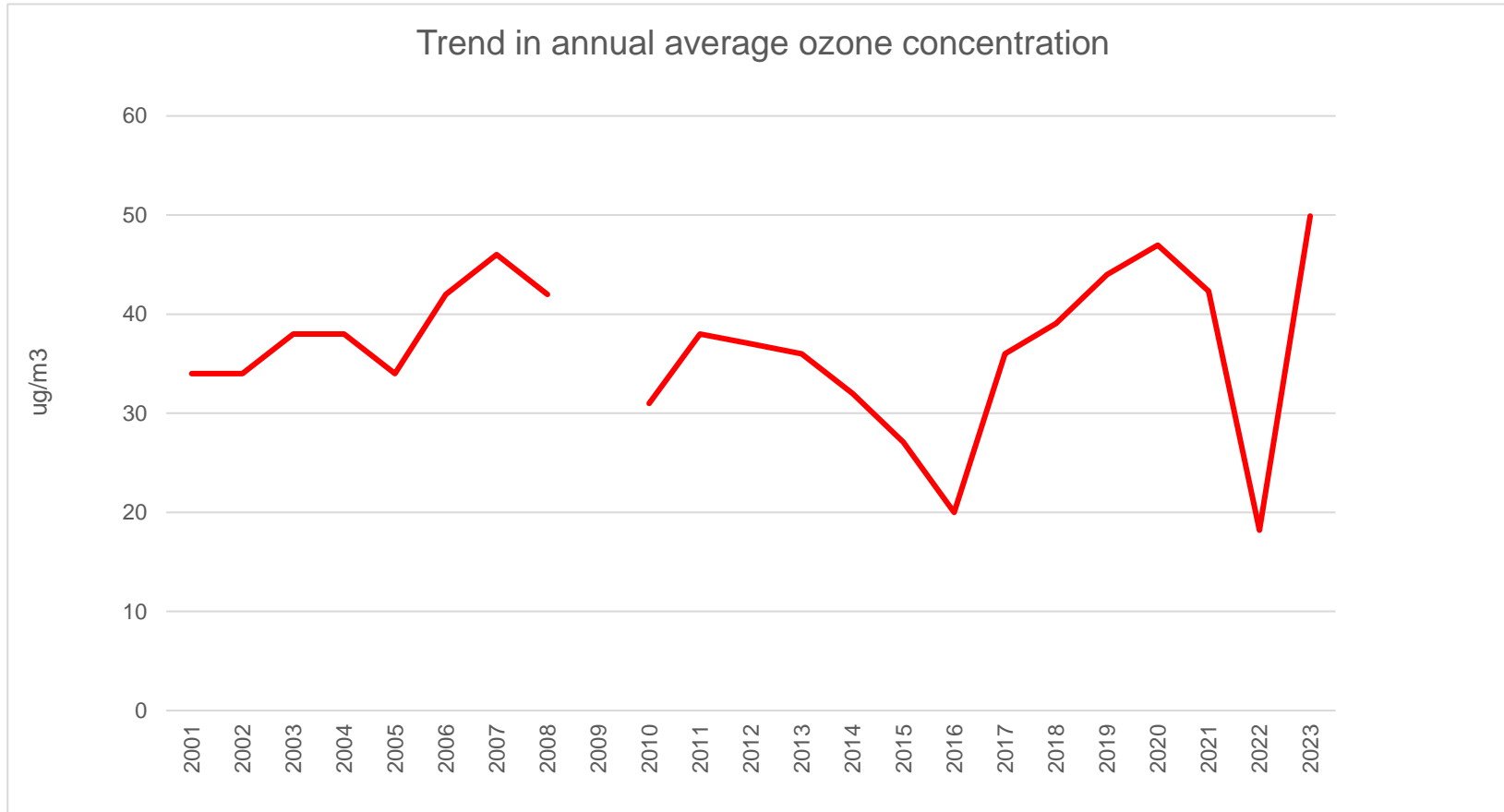
Exceedances of the SO₂ objectives are shown in **bold** (8-hour mean > 100 µg/m³ = 10 allowed a year).

If the period of valid data is less than 85%, the relevant percentiles are provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Figure A.5 – Trends in Annual Mean O₃ Concentrations



This figure presents O₃ annual mean concentrations between years 2001 and 2023. (Note that there is no local air quality objective for annual mean O₃ concentrations so this data is presented for information only). There is no clear trend over the entire period.

Appendix B: Full Monthly Diffusion Tube Results for 2023

Table B.1 – NO₂ 2023 Diffusion Tube Results (µg/m³)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT1	292199	92814	25.6	29.6	23.4	23.1	20.0	19.1	14.1	16.2	21.9	24.0	23.5	18.4	21.6	17.5	-	
DT2	292315	93016	30.8	30.9	25.6	22.5	16.4	19.0	18.9	20.4	25.9	30.0	28.5	27.1	24.7	20.0	-	
DT3	292185	93049	25.2	28.3	27.5	23.4	17.4	19.4		21.1	28.1	27.5	24.5	23.5	24.2	19.6	-	
DT4	291779	93011	24.3	28.4	23.4	20.7	16.2		13.7	17.2	24.1	27.7	23.2	17.2	21.5	17.4	-	
DT5	291944	92826	22.8	27.8	21.4	20.5	22.1	18.8	13.0	17.2	21.3	25.7	25.3	18.2	-	-	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT6	291984	92626	26.4	27.7	20.6	21.3	22.4	19.5	12.8	18.6	22.8	25.3	23.7	17.6	21.4	17.3	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT7	291895	92569	24.3	27.3	25.3	21.8	16.7	19.0	18.7	18.6	25.6	29.7	23.2	21.0	22.6	18.3	-	
DT8	291943	92511	32.5	34.3	29.3	27.2	24.8	25.3	26.7	27.0	32.7	34.9			29.5	23.9	-	
DT9	291833	92433	29.0	31.1	24.4	21.6	21.8	19.6	20.0	21.9	26.5	28.2	29.9	24.8	24.9	20.2	-	
DT10	292291	92292	27.2	32.6	25.9	24.2	19.1	19.3	19.1	21.3	28.7	31.2	27.1	22.5	24.9	20.1	-	
DT11	292422	92320	33.8	35.3	27.4	25.5	22.0	22.6	18.0	22.1	29.3	31.6	32.1	25.9	27.1	22.0	-	
DT12	292590	92743	23.1	37.1	17.6	23.9	24.6	24.4	18.5	22.0	21.4	28.7	20.8	14.7	23.1	18.7	-	
DT13	292832	92731	25.6	26.6	19.3	18.2	16.2		11.4	13.7	20.3	22.9	21.6	16.9	19.3	15.7	-	
DT14	292703	92807	24.7	27.1	18.1	18.6	14.7	13.2	10.0	13.3	17.6	22.1	21.4	13.9	17.9	14.5	-	
DT15	292378	92039	36.6	43.1	33.3	35.0	31.5	30.0	20.9	25.4	32.6	36.9	33.1	23.5	31.8	25.8	-	
DT16	291699	92091	34.5	37.8	26.3	26.9	23.7	22.2	15.6	21.0	27.0	30.3	30.7	22.7	26.6	21.5	-	
DT17	291657	91973	26.2	26.2	18.8	16.2	15.9	14.9	15.2	15.8	21.3	21.9	25.1	18.7	19.7	15.9	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT18	291669	91812	28.9	28.3	21.9	19.1	18.6	17.3	17.9	19.0		25.2	23.9	18.8	21.7	17.6	-	
DT19	291532	91349	44.7	55.2	42.5	45.2	48.0	47.2	28.7	34.8	43.4	47.1	40.9	29.7	42.3	34.3	-	
DT20	291460	91390	38.7	35.3	30.2	29.0	27.4	27.4	25.5	26.0	30.5	33.1	33.5	26.1	30.2	24.5	-	
DT21	291509	91151	16.5	20.2	13.0	12.5	9.4	9.7	4.7	9.2	13.4	16.0	13.6	7.8	12.2	9.9	-	
DT22	291518	90813	17.3	32.3	16.3	29.7	20.6	26.6	15.7	21.0	28.5	33.3	21.8	9.2	22.7	18.4	-	
DT23	291691	90425	23.6	29.9	27.0	21.9	29.4	24.2	16.3	18.9		29.3	8.6	16.5	22.3	18.1	-	
DT24	291767	90160	30.1	31.0	23.2	21.7	19.6	18.5	14.8	17.2	22.8	25.1	24.4	15.7	22.0	17.8	-	
DT25	291520	90531	33.3	33.5	28.0	26.7	19.5	24.3	23.3	23.6	29.3	29.4	29.5		27.3	22.1	-	
DT26	290864	91725	37.4	35.4	28.7	29.5	23.2	25.0	27.3	24.5	26.8	32.8	33.3	27.9	29.3	23.8	-	
DT27	291249	91874	42.0	42.4	42.1	39.6	29.1	37.0	34.5	31.2	44.7	45.9	37.7	36.3	38.5	31.2	-	
DT28	291376	91944	26.9	31.1	23.5	22.1		19.3	14.9	17.3	22.6	27.1	24.4	17.2	22.4	18.1	-	
DT29	291500	92055	36.6	42.3	38.2	40.9	32.0	35.9	27.5	31.6	37.6	48.2	34.1	27.3	36.0	29.2	-	
DT30	291351	92169	39.3	40.3	32.5	32.4	30.0		26.9	29.6	34.7	38.2	38.9	30.2	33.9	27.5	-	
DT31	290826	93598	29.0	28.8	23.2	23.0	19.5	21.5	18.2	20.2	25.6	27.1	25.6	20.3	23.5	19.0	-	
DT32	291253	93299	29.3	29.5	27.3	24.9	20.9	24.2	19.6	21.4	28.5	30.6	26.4	23.9	25.5	20.7	-	
DT33	291242	93483	32.4	37.8	28.2	27.2	28.2	26.7	19.0	22.3	27.1	29.0	33.2	23.5	27.9	22.6	-	
DT34	291272	93468	43.2	43.4	41.3	41.0	34.6	35.6	33.7	34.0	42.0	43.3	42.0	36.2	39.2	31.7	-	
DT35	291054	94399	33.5		33.3	30.4	25.8	26.7	25.3	24.1	33.8	32.9	34.3	28.4	29.9	24.2	-	
DT36	292391	93291	36.4	37.2	38.5	34.1	13.5	27.7	27.7	26.6	34.2	41.5	34.6	31.5	32.0	25.9	-	
DT37	292469	93245	26.9	32.3	28.9	27.6	22.5	24.1	19.0	21.2	30.8	34.9	27.4	23.3	26.6	21.5	-	
DT38	292579	93146	30.0	33.6	26.3	25.0	20.4	21.9	17.5	19.4	27.4	28.3	28.0	23.0	25.1	20.3	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT39	293047	93877	35.5	42.3	36.2	35.8	35.4	31.4	22.2	26.4	34.7	38.0	35.2	25.2	33.2	26.9	-	
DT40	293405	93395	25.1	28.6	25.3	24.0	17.4	20.6	15.6	17.4	27.8	31.0	25.0	19.4	23.1	18.7	-	
DT41	293251	93375	33.8	33.5	29.1	24.4	17.8	25.4	24.9	23.3	36.7	38.1	33.0	28.5	29.0	23.5	-	
DT42	293227	93356	39.2	44.4	37.7	36.3	26.2	32.6	29.3	30.9	43.5	45.1	40.7	32.2	36.5	29.6	-	
DT43	295068	94487	35.2	32.3	25.8	22.9	21.0	21.4	20.1	22.1	26.0	28.6	30.9	24.9	25.9	21.0	-	
DT44	295888	94101	24.5	25.2	19.7	17.8	15.4	13.8	12.4	12.3	18.8	19.6	20.5	16.5	18.0	14.6	-	
DT45	296418	94470	20.5	20.4	18.7	15.6	12.4		15.6	15.4	22.7	24.2	21.9	19.0	18.8	15.2	-	
DT46	296984	94327	32.9	30.4	24.1	21.7	19.2	21.0	19.5	19.4	25.7	28.5	31.6	29.4	25.3	20.5	-	
DT47	296494	93782	18.2	20.7	17.0	15.7	12.7	14.7	11.2	12.1	18.5	21.4	16.2		16.2	13.1	-	
DT48	295413	93689	30.0	28.1	22.0	19.6	16.5	12.8	12.4	14.0	21.4	23.8	22.0	16.7	19.9	16.2	-	
DT49	293091	92825	21.0	24.5	17.4	16.9	14.9	14.6	9.8	13.0	17.3	19.5	20.4	14.3	17.0	13.7	-	
DT50	293448	92419	16.8	18.1	13.2	11.7	7.8	8.1	7.8	9.0	13.5	15.4	15.4	6.6	11.9	9.7	-	
DT51	293418	92497	36.7	46.3	39.4	37.8	34.2	28.9	20.6	26.4	34.4	40.9	40.6	27.6	34.5	27.9	-	
DT52	293533	92473	48.3	51.9	45.6	42.4	34.5	35.3	35.2	35.3	45.2	46.2	50.4	43.3	42.8	34.7	-	
DT53	293738	92396	41.3	42.7	33.0	38.7	32.6	34.7	30.0	31.4	34.0	40.3	37.3	28.5	35.4	28.6	-	
DT54	293781	92409	43.9	44.0	40.0	38.2	30.4	38.1	35.6	34.1	44.0	47.0	41.9	40.0	39.8	32.2	-	
DT55	294043	92359	34.0	31.8	27.8	27.3	24.0	22.5	19.0	22.2	25.7	29.7	22.2	23.8	25.8	20.9	-	
DT56	294410	92310	44.9	43.8	40.3	39.7	22.4	32.0	33.1	31.2	41.7	44.3	40.3	38.9	37.7	30.6	-	
DT57	295203	92378	53.2	55.0	54.0	54.4	35.9	46.9	43.4	42.8	53.7	55.1	55.3	49.9	50.0	40.5	-	
DT58	295191	92395	47.7	51.0	38.7	41.5	35.5	36.3	32.7	34.0	43.2	49.3	47.9	38.7	41.4	33.5	-	
DT59	295466	92365	24.1	26.5	18.3	17.6	13.8	13.6	11.5	14.4	20.8	22.6	21.7	16.2	18.4	14.9	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT60	295636	92232	37.4	42.7	31.6	30.8	29.4	30.1	19.6	23.0	31.7	33.6	31.5	24.0	30.4	24.7	-	
DT61	295710	90571	25.7	28.2	22.4	19.8		17.4	15.7	18.1	24.6	25.5	22.4	18.0	21.6	17.5	-	
DT62	294694	90001	24.1	24.4	15.7	15.8	15.2	13.3	10.7	12.7	17.7	19.7	16.9	13.3	16.6	13.5	-	
DT63	294652	89974	30.6	29.7	23.7	21.5	18.5	20.1	21.2	20.4	24.2	25.1	24.7	23.5	23.6	19.1	-	
DT64	296415	88477	25.4	27.6	19.1	16.7	16.9	14.8	12.6	14.8	19.1				18.5	15.0	-	
DT65	294227	90435	26.6	32.5	24.4	26.4	23.8	24.2	14.8	20.2	24.6	23.2	21.8	15.0	23.1	18.7	-	
DT66	293213	91245	40.4	40.5	35.1	35.4	29.8	32.4	30.1	31.1	41.6	42.8	37.2	30.5	35.6	28.8	-	
DT67	292291	91678	25.0	27.7	23.1	22.8	19.1	21.6	16.0	18.9	27.4	30.2	22.9	16.6	22.6	18.3	-	
DT68	291016	91304	18.7	19.0	12.5	10.4	9.0	7.9		9.2	12.6	14.5	13.5		12.7	10.3	-	
DT69	291298	92593	15.0	17.5	10.7	10.1	6.8	7.0	5.3	7.6		13.3	12.3	6.9	10.2	8.3	-	
DT70	294387	92611	21.3	25.0	16.2	16.3	15.4	13.3	9.3	13.0			20.5	6.9	15.7	12.7	-	
DT71	293617	93090	14.8	15.1	9.8	8.8	5.3	5.9	6.0	6.8	10.6	12.3	11.4	8.4	9.6	7.8	-	
DT72	293052	94185	21.1	20.0	13.7	12.6	9.8	9.6	9.1	8.8	13.4	15.1	16.5	11.9	13.5	10.9	-	
DT73	292056	93043	12.5	13.4	10.4	9.2	5.3	6.2	5.5	6.4	10.5	13.8	11.5	8.6	9.4	7.6	-	
DT74	291721	89727		17.6	11.3	11.0	10.2	8.1	7.1	8.8	12.3	15.0	14.2		11.6	9.4	-	
DT75	291555	90449	20.7	22.8	15.0	14.2	11.7	12.0	9.5	12.3	15.5	19.8	17.6	11.2	15.2	12.3	-	
DT76	292553	93082	19.9	21.7	12.3	13.2	11.1	11.6	8.7	11.1	14.9	17.2	17.5	10.6	14.1	11.5	-	
DT77	296415	94165	32.4	34.2	30.0	25.6	24.4	23.8	19.8	21.1	26.8	29.9	28.0	23.5	26.6	21.6	-	
DT78	296827	93886	22.2	22.3		17.0	13.3	13.0	11.4	12.5	18.6	19.5	18.5	14.3	16.6	13.5	-	
DT79	295967	88876	22.8	26.7	20.0	20.9	17.4	19.0	11.5	14.3	21.4	24.9	20.2	14.4	19.5	15.8	-	
DT80	292637	91991	28.2	27.7	20.0	19.6	17.6	17.4	14.1	17.3	22.1	21.5	23.1	17.7	20.5	16.6	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted (0.81)	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT81	292847	92911	21.1	22.1	15.7	13.5	9.9	10.3	8.8	10.7	16.2	17.9	18.2	12.4	14.7	11.9	-	
DT82	291655	92258	21.6	22.3	15.8	13.0	9.0	9.5	8.8	10.6	14.5	17.2	18.6	15.6	14.7	11.9	-	
DT83	291897	92217	31.7	37.1		25.0	25.2		21.8	22.8	28.4	31.2	31.2	25.9	28.0	22.7	-	
DT84	291375	92935	23.6	26.2		17.5	20.8	16.2	13.6	17.3	20.8	22.2	27.3	18.8	20.4	16.5	-	
DT85	291375	92935	40.9	40.7	35.0	32.8	31.7	30.8	25.3	27.8	27.1	38.2	38.8	31.9	33.4	27.1	-	

- All erroneous data has been removed from the NO₂ diffusion tube dataset presented in Table B.1.
- Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.
- Local bias adjustment factor used.
- National bias adjustment factor used.
- Where applicable, data has been distance corrected for relevant exposure in the final column.
- Exeter City Council confirm that all 2023 diffusion tube data has been uploaded to the Diffusion Tube Data Entry System.

Notes:

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

NO₂ annual means exceeding 60µg/m³, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

See Appendix C for details on bias adjustment and annualisation.

Appendix C: Supporting Technical Information / Air Quality Monitoring Data QA/QC

New or Changed Sources Identified Within Exeter During 2023

Exeter City Council has not identified any new sources relating to air quality within the reporting year of 2023.

Additional Air Quality Works Undertaken by Exeter City Council During 2023

Appendix F contains the details of how the proposed new AQMA boundary has been determined.

QA/QC of Diffusion Tube Monitoring

Exeter City Council uses Gradko diffusion tubes (20% TEA in water). Gradko laboratories (GRADKO International Ltd., St. Martins House, 77 Wales Street, Winchester, Hants. SO23 0RH) hold UKAS accreditation, follow the procedures set out in the Harmonisation Practical Guidance and their performance was satisfactory in the centralised AIR NO₂ PT scheme for quality assurance and quality control.

The tube exposure period used generally follows the Diffusion Tube Monitoring Calendar provided by the Air Quality Support Helpdesk, i.e. an exposure time of 4 or 5 weeks, with an allowed variation in exposure time of ± 2 days. During 2023, the monitoring was completed in adherence with the 2023 Diffusion Tube Monitoring Calendar.

The tubes are stored in a fridge before they are exposed. Location sites and fixings follow the recommendations in the DEFRA practical guidance on the use of diffusion tubes for NO₂ monitoring, published in 2008. Two tubes are collocated with the continuous analyser at the Royal Albert Memorial Museum (RAMM), Queen Street (Exeter Roadside).

Data from the tubes are ratified and suspect data rejected by Exeter City Council, following the procedure in the DEFRA practical guidance. Random checks of the data in the reporting spreadsheet are also undertaken to ensure that no mistakes were made when inputting the data. Analysis of the data from the two tubes that are co-located with the continuous analyser shows that these have overall good precision.

Diffusion Tube Annualisation

All diffusion tube monitoring locations within Exeter recorded data capture of 75% therefore it was not required to annualise any monitoring data. In addition, any sites with a data capture below 25% do not require annualisation.

Diffusion Tube Bias Adjustment Factors

The diffusion tube data presented within this ASR have been corrected for bias using an adjustment factor. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. LAQM.TG22 provides guidance with regard to the application of a bias adjustment factor to correct diffusion tube monitoring. Triplicate co-location studies can be used to determine a local bias factor based on the comparison of diffusion tube results with data taken from NO_x/NO₂ continuous analysers. Alternatively, the national database of diffusion tube co-location surveys provides bias factors for the relevant laboratory and preparation method.

Exeter City Council have applied a national bias adjustment factor of 0.81 to the 2023 monitoring data (from the March 2023 national bias adjustment spreadsheet). This factor was chosen because the data collection at the RAMM (CM1) continuous analyser was low. It is based on 23 studies. A summary of bias adjustment factors used by Exeter over the past five years is presented in Table C.1.

Table C.1 – Bias Adjustment Factor

Monitoring Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2023	National	03/24	0.81
2022	Local	-	0.77
2021	National	03/22	0.84
2020	Local	-	0.74
2019	Local	-	0.89

NO₂ Fall-off with Distance from the Road

Wherever possible, monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure

has been estimated using the Diffusion Tube Data Processing Tool/NO₂ fall-off with distance calculator available on the LAQM Support website. Where appropriate, non-automatic annual mean NO₂ concentrations corrected for distance are presented in Table B.1.

No diffusion tube NO₂ monitoring locations within Exeter required distance correction during 2023.

QA/QC of Automatic Monitoring

Neither of the two PM analysers are part of the national network, however recommended QA/QC procedures from the AURN Local Site Operator's manual are followed. ET also service each analyser every six months. The analyser at RAMM (CM1) was not available for much of the year, because of a long-running fault.

Live PM10 and PM2.5 data is available at this [page](#).

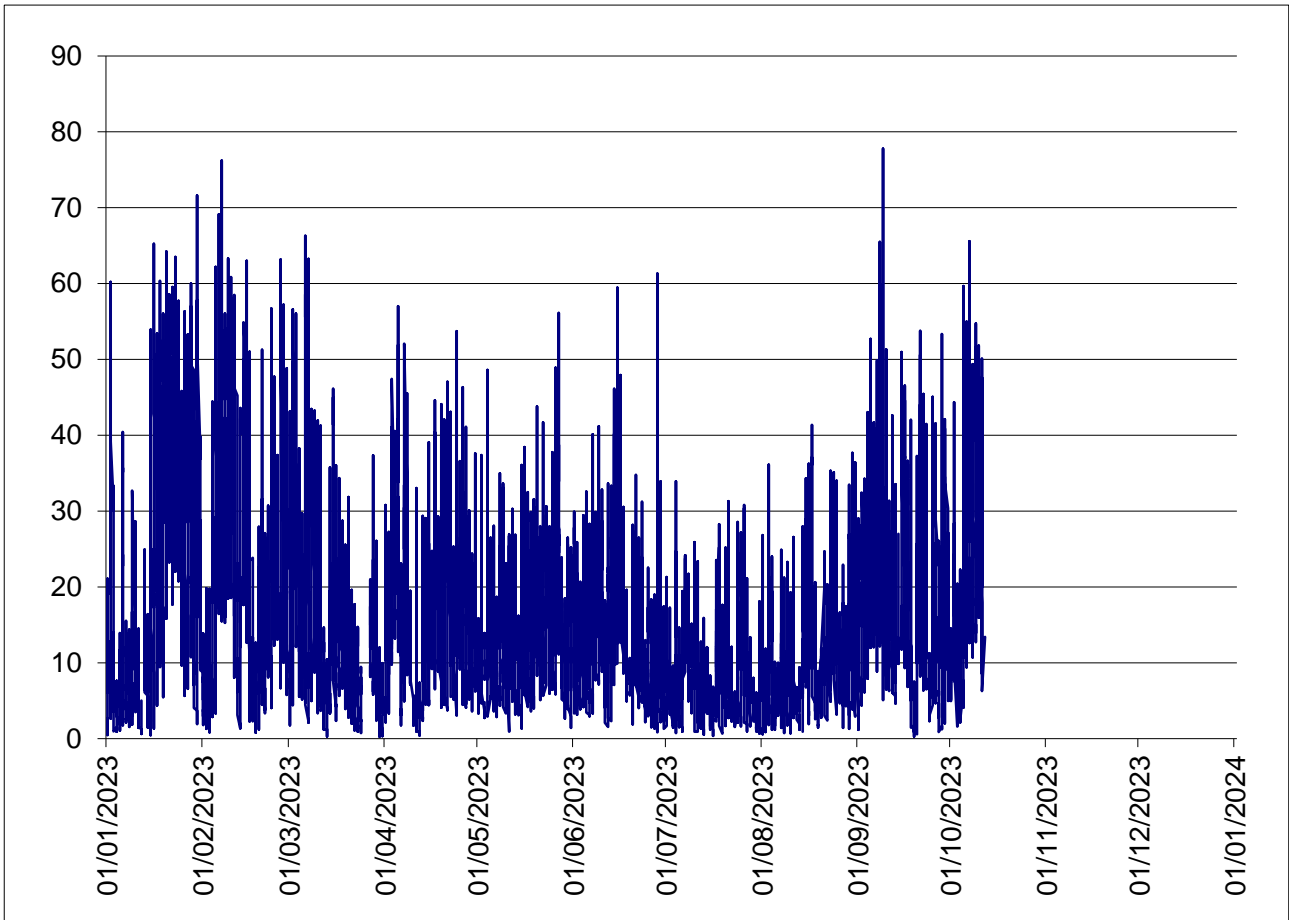
The PM data is collected, validated and ratified by Exeter City Council. Validation involves checking the data daily for instrumentation errors etc. and then visually screening the data on a weekly basis to mark any obviously spurious or unusual measurements. The Council also undertakes data ratification on an approximately three monthly basis as well as following site services. This involves:

- Comparison of data with other pollutants and other appropriate AURN network sites (roadside sites and other sites in the south west),
- Final checking and deletion of data marked as possibly erroneous,
- Removal of data from unrepresentative periods of operation (e.g. road works in immediate vicinity of site etc. where data is shown or believed to have been affected),
- Adjustment for issues identified during services etc.

The NO₂ data from Exeter Roadside is collected and ratified by the AURN. Network data from the site can be found at [this link](#). It is ratified every 3 months by NETCEN, and is reported in the QA / QC Data Ratification Report for the Automatic Urban Network. Data capture from the NO₂ analyser was 76% in 2023 (scaffold erected for repairs at the RAMM site has meant that the data for the last part of the year cannot be used).

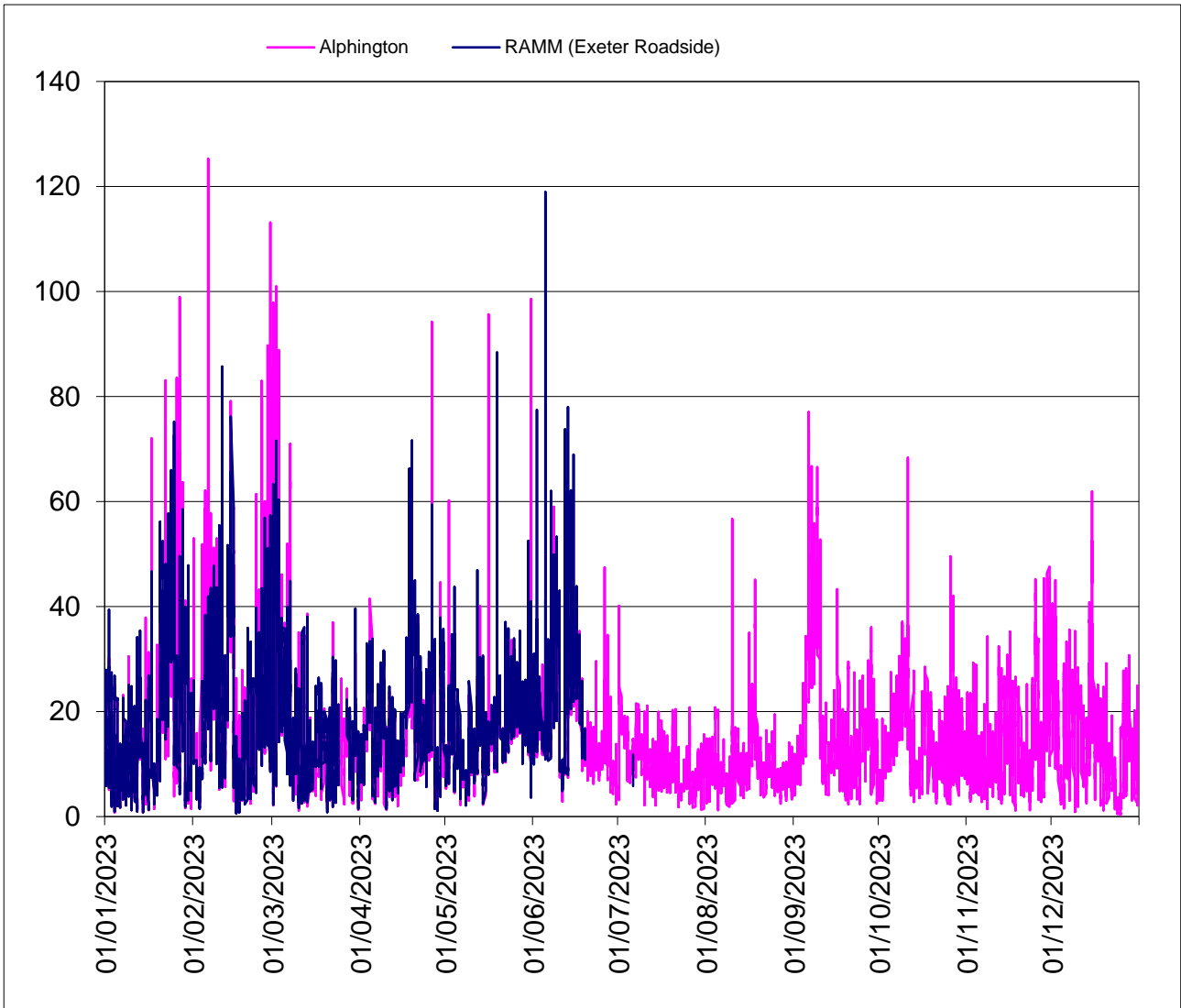
Plots of hourly average values for nitrogen dioxide, PM₁₀ and PM_{2.5} are shown below in figures C.1, C.2 and C.3.

Figure C.6 – Hourly NO₂ data from Exeter Roadside (RAMM) (µg/m³)



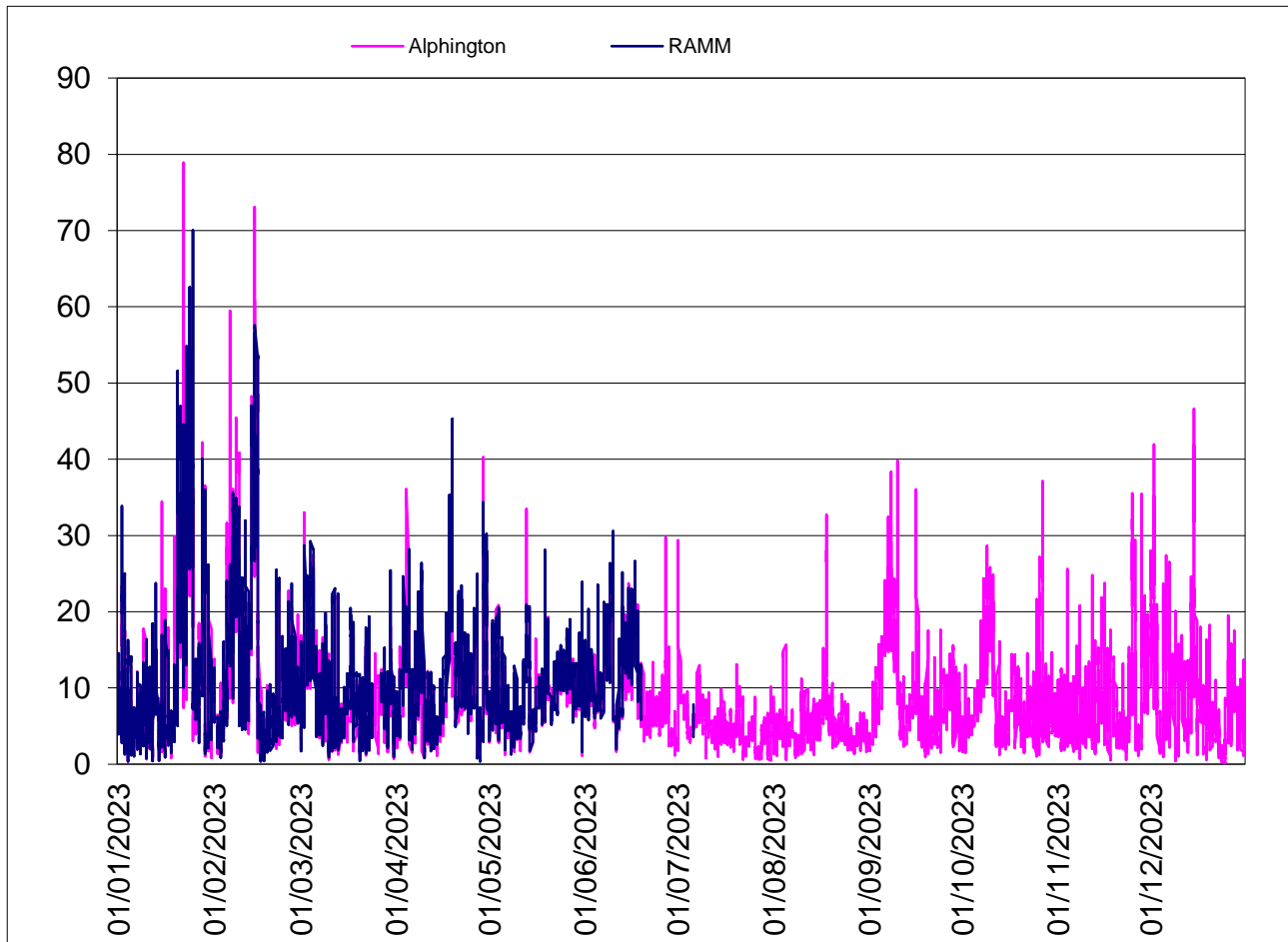
This graph shows the hourly NO₂ data from the RAMM continuous analyser.

Figure C.7 – Hourly PM₁₀ data from Exeter Roadside (RAMM) and Alphington (µg/m³)



This graph shows the hourly PM₁₀ data from the RAMM and Alphington Street continuous analysers.

Figure C.8 – Hourly PM_{2.5} data from Exeter Roadside (RAMM) and Alphington (µg/m³)



This graph shows the hourly PM_{2.5} data from the RAMM and Alphington Street continuous analysers.

PM₁₀ and PM_{2.5} Monitoring Adjustment

The type of PM₁₀/PM_{2.5} monitors utilised within Exeter City Council do not require the application of a correction factor.

Automatic Monitoring Annualisation

Data capture from the PM₁₀ and PM_{2.5}, NO₂ and O₃ continuous analysers at RAMM (Exeter Roadside CM1) were below 75% so these have been annualised using the method described in the Technical Guidance. Annualisation factors were gained using data from nearby (<50 miles) AURN urban or rural background sites which have data

capture of over 75%. The annualisation factors for each pollutant are fairly similar for all the sites used, especially for NO₂ and O₃. Details of the calculation method undertaken are provided in Tables C.4 to C.7.

Table C.4 – PM10 Annualisation Summary (concentrations presented in µg/m³)

Site ID	Annualisati on Factor Plymouth Centre	Annualisati on Factor Honiton	Annualisati on Factor Yarner Wood	Annualisati on Factor Site 4 Charlton Mackerell	Average Annualisati on Factor	Raw Data Annual Mean	Annualised Annual Mean
CM1	1.03	1.12	1.06	1.12	1.08	18.6	20.07

Table C.5 – PM2.5 Annualisation Summary (concentrations presented in µg/m³)

Site ID	Annualisati on Factor Plymouth Centre	Annualisati on Factor Honiton	Annualisati on Factor Yarner Wood	Annualisati on Factor Charlton Mackerell	Average Annualisati on Factor	Raw Data Annual Mean	Annualised Annual Mean
CM1	1.08	1.21	1.16	1.23	1.17	11.3	13.17

Table C.6 – NO₂ Annualisation Summary (concentrations presented in µg/m³)

Site ID	Annualisati on Factor Plymouth Centre	Annualisati on Factor Yarner Wood	Annualisati on Factor Charlton Mackerell	Annualisati on Factor 4	Average Annualisati on Factor	Raw Data Annual Mean	Annualised Annual Mean
CM1	1.01	1	1	-	1	16.47	16.47

Table C.7 – O₃ Annualisation Summary (concentrations presented in µg/m³)

Site ID	Annualisati on Factor Plymouth Centre	Annualisati on Factor Yarner Wood	Annualisati on Factor Charleton Mackerell	Annualisati on Factor 4	Average Annualisati on Factor	Raw Data Annual Mean	Annualised Annual Mean
CM1	0.96	0.96	0.98	-	0.97	48.5	46.94

NO₂ Fall-off with Distance from the Road

Wherever possible, monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure has been estimated using the NO₂ fall-off with distance calculator available on the LAQM

Support website. Where appropriate, automatic annual mean NO₂ concentrations corrected for distance are presented in Table A.3.

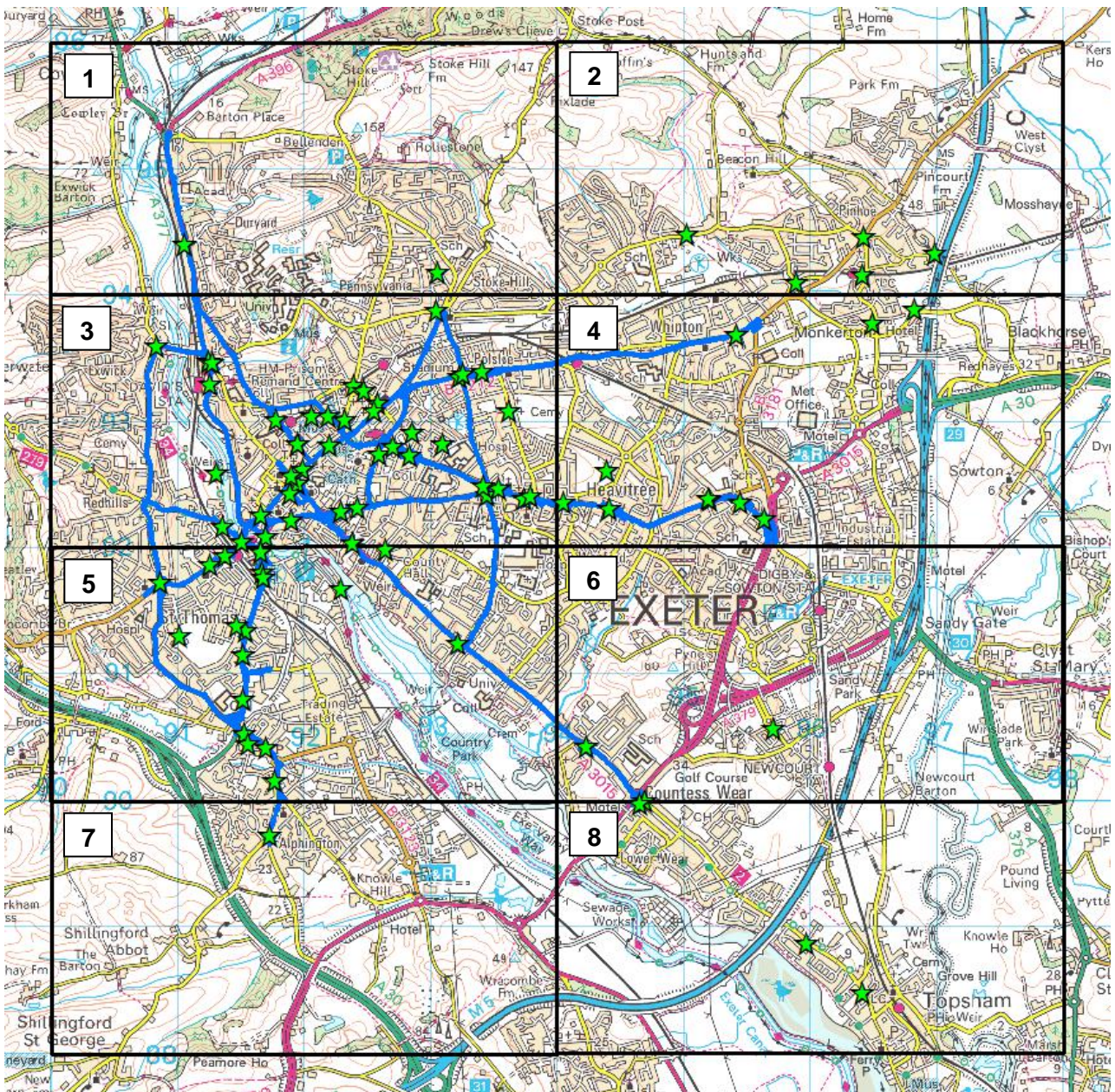
No automatic NO₂ monitoring locations within Exeter required distance correction during 2023.

Appendix D: Map(s) of Monitoring Locations and AQMAs

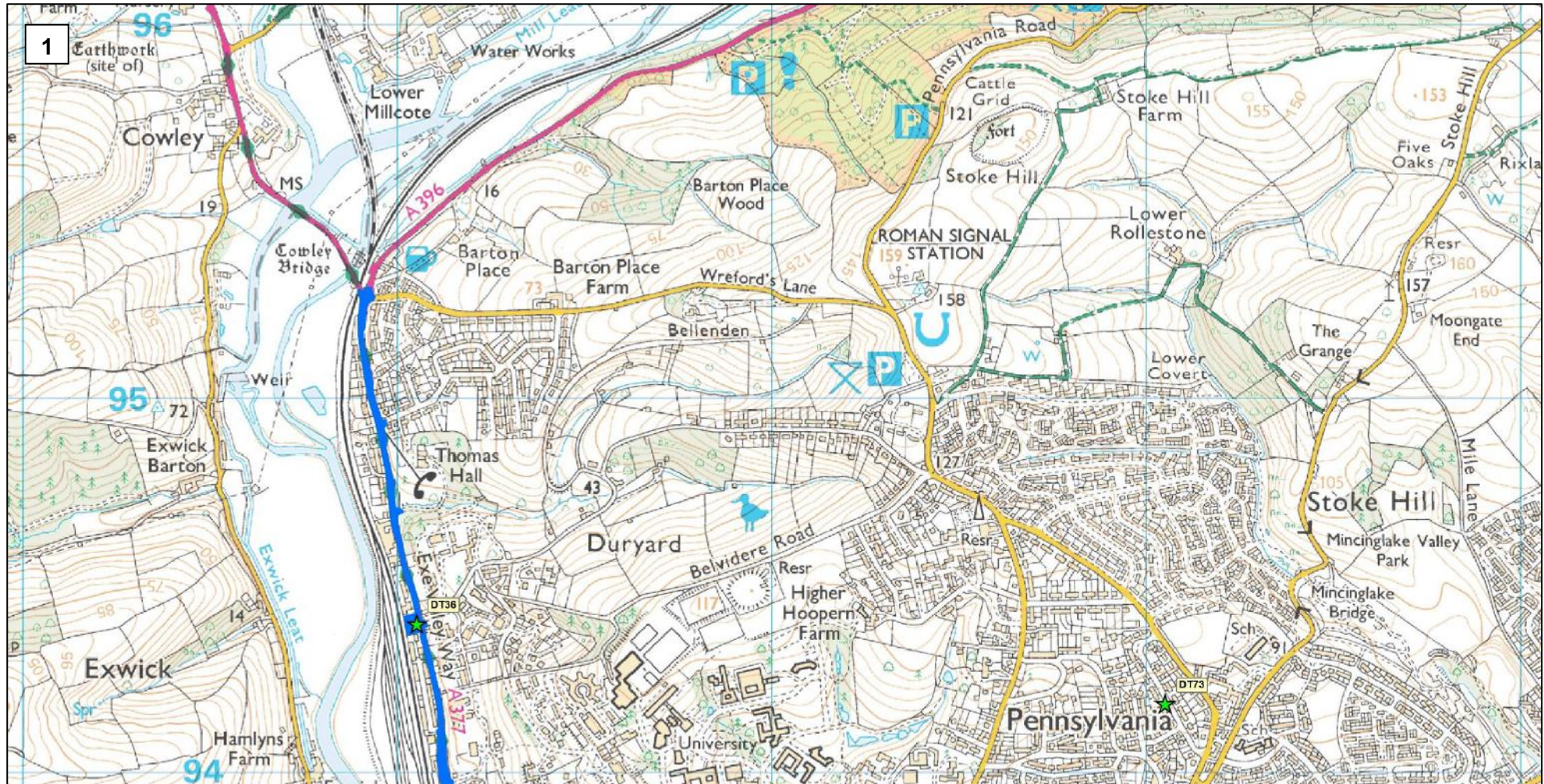
Figure D.1 – Map of Non-Automatic Monitoring Site

The monitoring locations and 2023 data can also be viewed using an online map [here](#).

Monitoring location = ★
 AQMA =



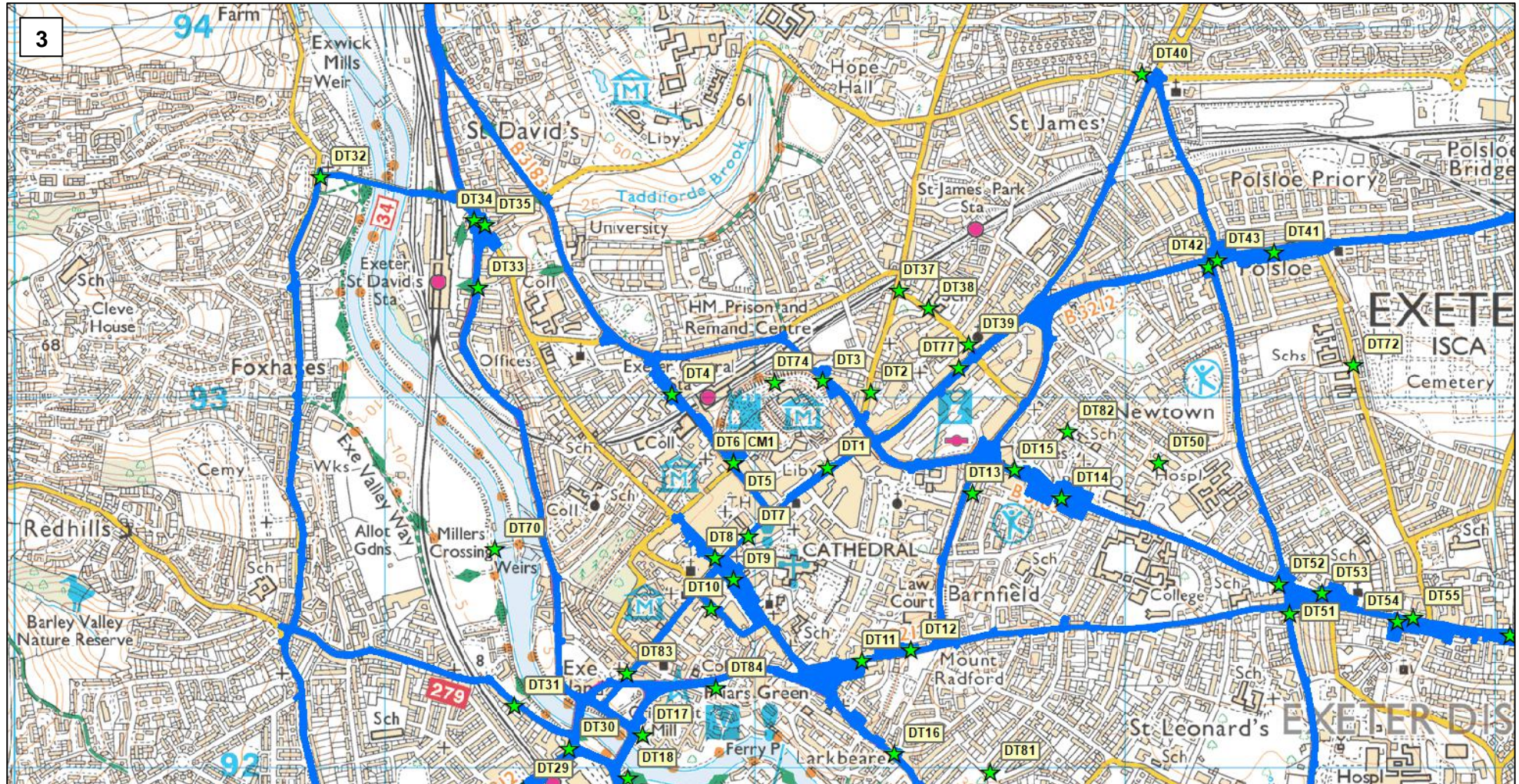
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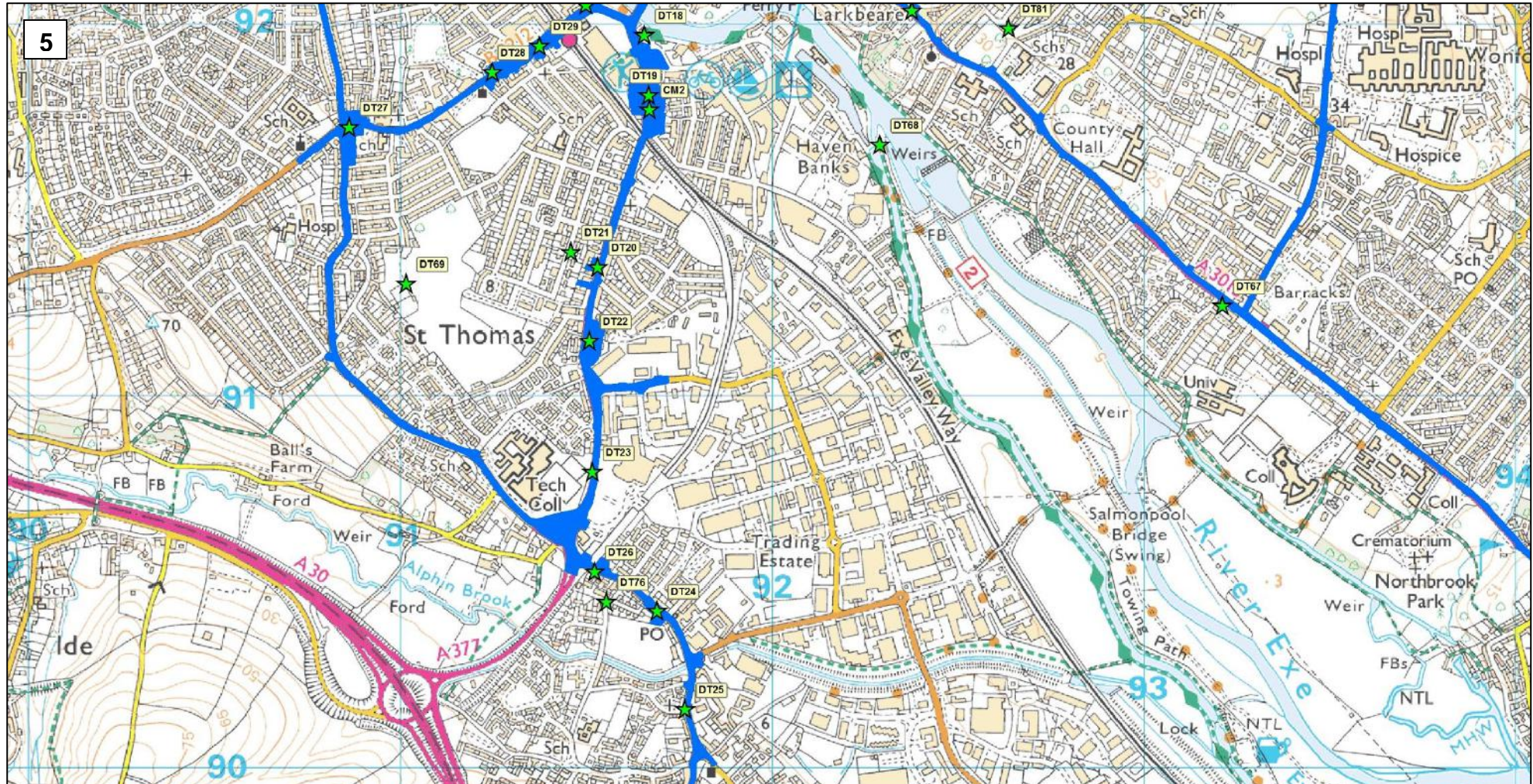
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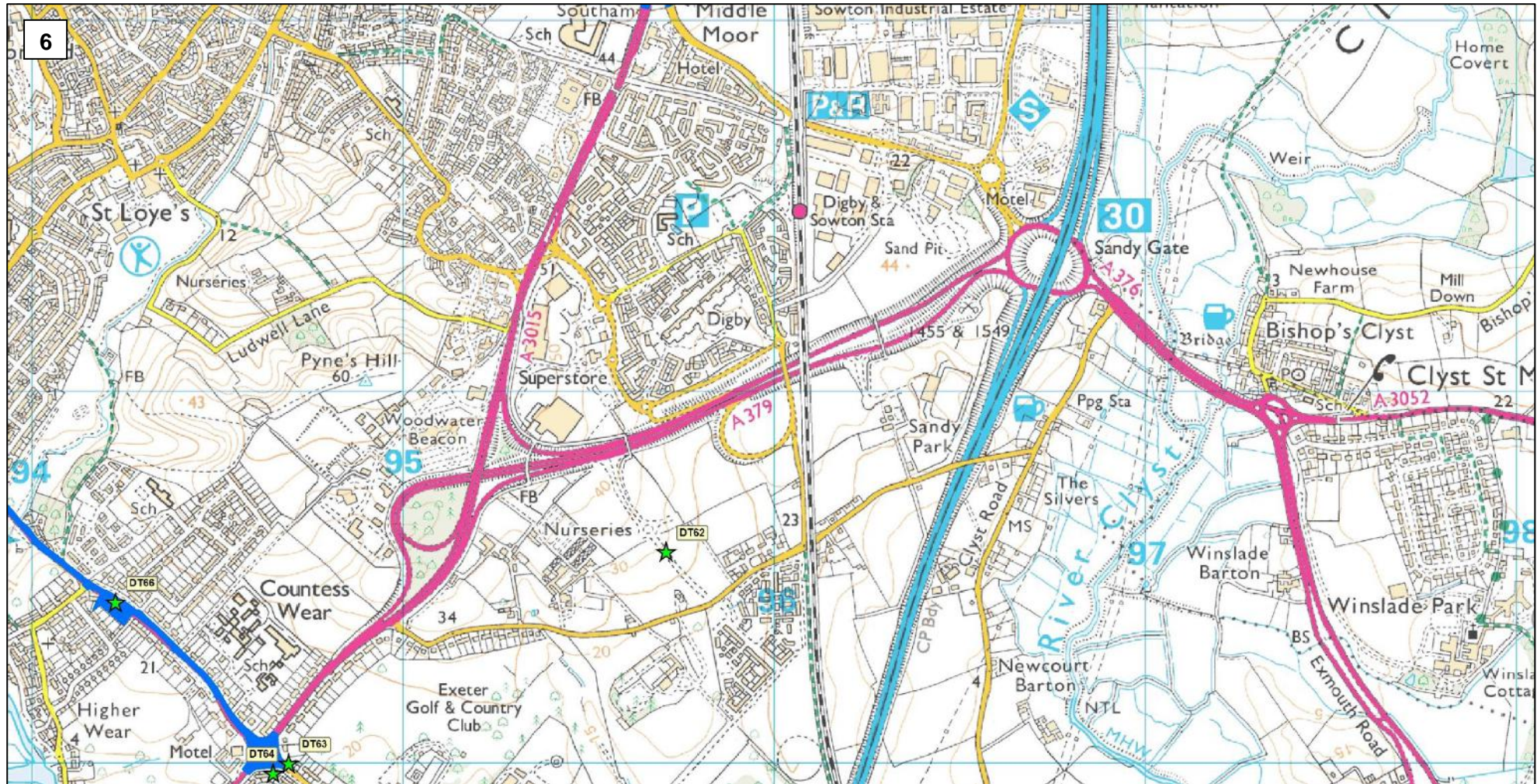
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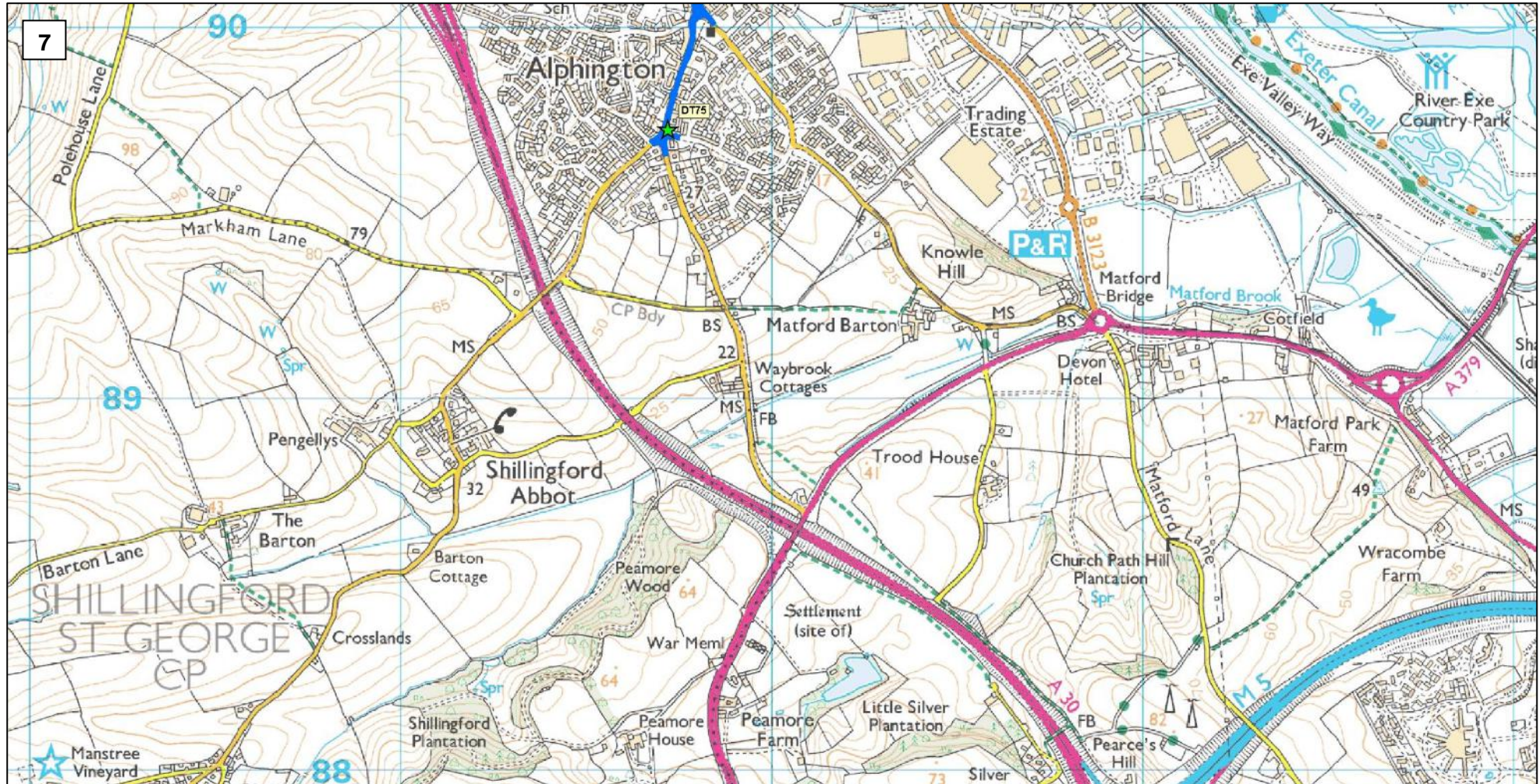
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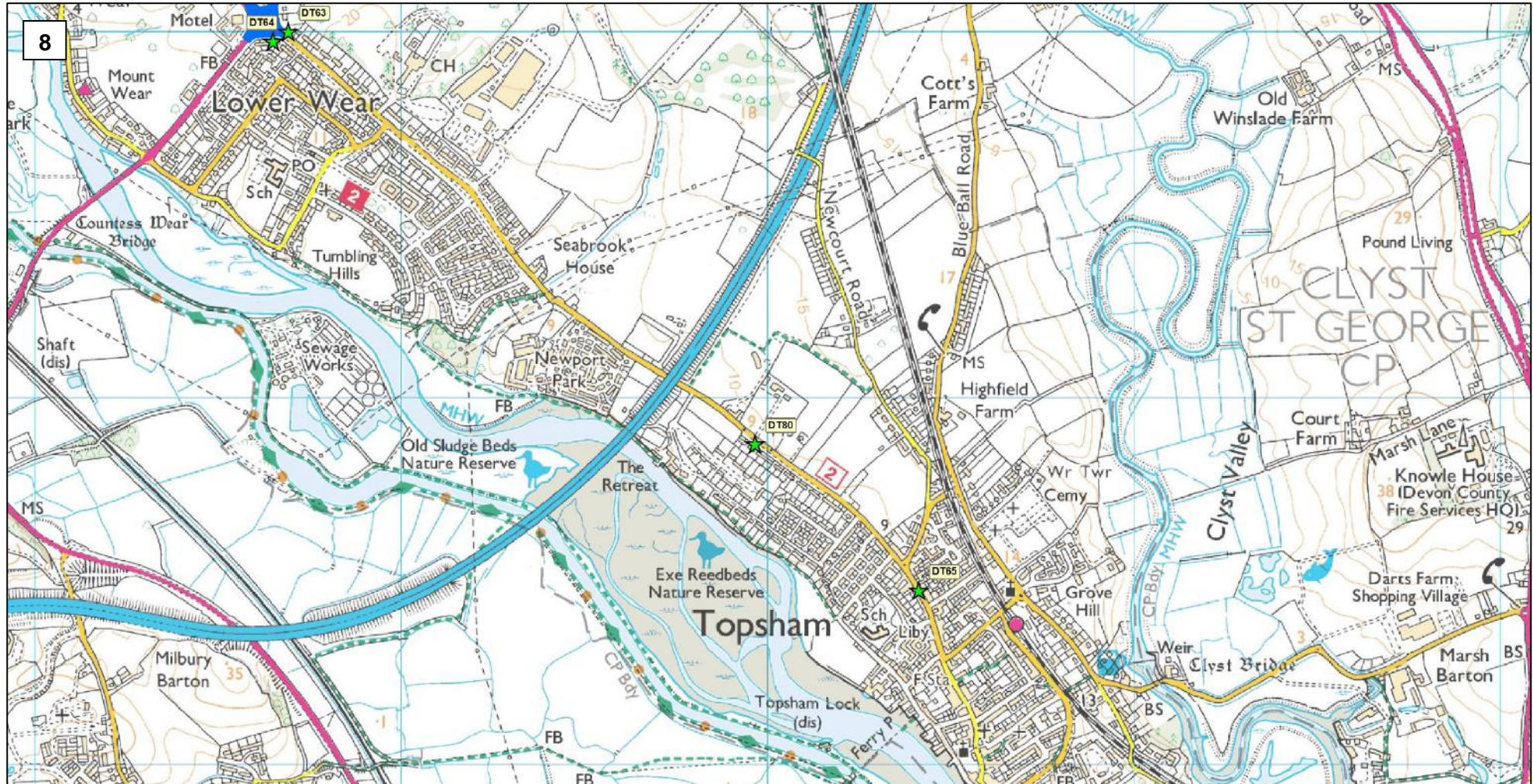
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Appendix E: Summary of Air Quality Objectives in England

Table E.1 – Air Quality Objectives in England⁷

Pollutant	Air Quality Objective: Concentration	Air Quality Objective: Measured as
Nitrogen Dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
Nitrogen Dioxide (NO ₂)	40µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean
Particulate Matter (PM ₁₀)	40µg/m ³	Annual mean
Sulphur Dioxide (SO ₂)	350µg/m ³ , not to be exceeded more than 24 times a year	1-hour mean
Sulphur Dioxide (SO ₂)	125µg/m ³ , not to be exceeded more than 3 times a year	24-hour mean
Sulphur Dioxide (SO ₂)	266µg/m ³ , not to be exceeded more than 35 times a year	15-minute mean

⁷ The units are in microgrammes of pollutant per cubic metre of air (µg/m³).

Appendix F: Review of AQMA Boundary

There are two steps involved in the process. Firstly, the Council needs to have confidence that it has identified all locations for which the air quality objectives are exceeded. Secondly, it then needs to identify an AQMA boundary which includes these locations. The AQMA boundary can be larger than the area of exceedance although the current intent is for a smaller, more specific 'hot spot' AQMA which provides a clearer focus for AQAP measures.

The policy and technical guidance does not specify how councils should identify the limits to the areas of exceedance, only saying that the authority should have broad confidence in the monitoring data and/or modelling, be aware of the uncertainties and show in their annual report what steps they have taken to minimise these. However the guidance goes on to warn local authorities against expending significant resources narrowing down the parameters of an AQMA to the detriment of identifying measures and taking action. DEFRA suggest that where normal annual monitoring and local intelligence shows a persistent exceedance (or risk of exceedance) the local authority consider moving immediately to declaring and establishing (or extending) an AQMA and hence to the development of AQAP measures to remediate the problem. Only local authorities who, until now, have had few air quality problems, or have sufficient doubts, should consider the necessity of obtaining further supporting information.

This paragraph above suggests that provided the uncertainties can be minimised there is no absolute requirement for modelling of the extent of an exceedance. The question is therefore whether the monitoring that is currently undertaken by the Council is sufficient to allow us to determine the extent of the exceedance.

The 2023 data presented in this report shows that only the East Wonford Hill diffusion tube (DT57) is showing an exceedance. Furthermore, it is possible to say the following:

- The monitoring meets the DEFRA guidance for QA/QC, so uncertainties are reasonably well understood and controlled.
- The western (inner) extent of the exceedance is likely to be at or before the junction with Butts Road, because the diffusion tube beyond this junction (Fore Street inbound, DT56) is below the objective. This location is shown as the western red line on the map in Figure F.10 below.

- The eastern (outer) extent of the exceedance is likely to be at or before the junction with Rifford Road, because the diffusion tubes beyond this location (Honiton Road, DT58 and Honiton Road façade, DT59) are both below the objective. This location is shown as the eastern red line on the map in Figure F.10 below.
- The area of exceedance will be no larger than the existing AQMA, given that concentrations at all monitoring sites have reduced since that AQMA was declared.

The other question to be considered is whether both sides of this section of road are affected, or only the southern side (where the houses are closer to the roadside and where the diffusion tube is located). Currently the AQMA boundary includes the houses on both sides of the road, based on dispersion modelling undertaken prior to declaration, as shown in the map below. There is no suggestion that the extent of the exceedance will be greater than it was at that stage, given that monitored concentrations have fallen. There are two possible approaches:

- 1) Use the [attenuation with distance calculator](#) to predict the likely concentration at the façade of the houses on the north side. Using the 2023 data this shows a level of 35.2 mg/m³ at the closest house to the road. This suggests that only the south side is exceeding the limit. The background concentration for this calculation has been taken from the Heavitree Pleasure Ground diffusion tube (DT71), which is shown on the map in Figure F.10 below.

Figure F.9 – Attenuation with Distance Calculation

BUREAU VERITAS

Enter data into the pink cells

Step 1	How far from the KERB was your measurement made (in metres)?	2	metres
Step 2	How far from the KERB is your receptor (in metres)?	4	metres
Step 3	What is the local annual mean background NO ₂ concentration (in µg/m ³)?	7.8	µg/m ³
Step 4	What is your measured annual mean NO ₂ concentration (in µg/m ³)?	40.5	µg/m ³
Result	The predicted annual mean NO ₂ concentration (in µg/m ³) at your receptor	35.2	µg/m ³

- 2) Include both sides of the road even though there is no evidence that both are affected. This takes into account the uncertainty in the process described above, is

precautionary and also avoids making just a very small number of properties the subject of the AQAP. Including both sides of the road in this way would not 'dilute' the impact of the AQAP because it would still only include just a short stretch of one road.

It is proposed to adopt option 2 and the draft AQMA order, including the new boundary, is shown below. The new area includes 225m of road and 47 residential addresses.

This approach was sent to the LAQM helpdesk in May 2024 and the following response was received: We have reviewed the below and agree with your approach. Adopting option 2 seems to be this most robust approach and your reasoning is welcomed.

The Council will undertake an 11 week consultation on the proposed new boundary. The following consultees will be asked for their views:

- Residents within the new AQMA boundary (by means of a letter)
- The public, by means of information on the City Council website.
- Councillors on the Scrutiny and Executive committees, by means of the annual report
- Neighbouring District Councils and the County Council, by letter
- Director of Public Health, by letter
- Highways England, by letter
- Environment Agency, by letter
- Natural England, by letter

The draft consultation plan is included below.

1. Title of consultation	
Consultation on the revision of the Air Quality Management Area boundary.	
2. Responsible officers	
Director	David Bartram
Service lead	Simon Lane
Consultation lead officer	Alex Bulleid
3. Purpose of the consultation	

Explain why the council is consulting on this issue. Where the council has a preferred option, state this and explain how and why that preference was chosen. Where specific options have been rejected, explain why we do not consider them practical. Where options are offered, they should be realistic and deliverable.

It is necessary to amend the boundary of the current Air Quality Management Area to reflect the significantly improved levels of nitrogen dioxide in the city. There is a legal requirement to reduce the size of the current Area to reflect this change.

Exeter City Council’s proposed new boundary, and the justification for this, are described in the Air Quality Annual Status Report for 2024.

4. Timing, duration and key milestones

Set out when will the consultation take place and for how long (6-8 weeks minimum)

The consultation will commence when the Annual Status Report is presented to scrutiny committee on the 12 September 2024. It will end on 30 November 2024. The consultation period is 11 weeks.

Set out other key milestones e.g. date of report to committee, data analysis schedule and date of publication of results and feedback

Once the consultation period has ended, the responses will be evaluated and the final order then submitted to DEFRA before Christmas 2024 for their approval. The new order will be adopted and signed by the end of March 2025. (Anticipated Executive 4 February and Full Council 18 February 2025).

5. Equality Impact Assessment

Confirm that a EQIA has been completed and date

The EQIA is included within the Annual Status Report.

6. Consultees and how they will be consulted (survey, public meeting, exhibition, focus group)

Consultee	Method
Those most affected by the proposal (Those living in the revised Area)	Direct letter to households
Exeter residents	Consultation advertised on City Council website
General public	Consultation advertised on City Council website
Members (ECC and DCC)	Consultation starts after report is taken to scrutiny committee

Partners and other statutory stakeholders	Statutory consultees will be written to directly (see list in Annual Status report)
Other stakeholders	

7. Public Sector Equality Duty

Set out any special provisions that are required to ensure that people with protected characteristics are able to partake in the consultation.

Characteristic	Special provision
Age	Consultees will have the opportunity to respond by electronic communication, telephone or a personal visit (in the case of residents within the Area only)
Disability(includes mobility, sensory, learning and mental health)	Consultees will have the opportunity to respond by electronic communication, telephone or a personal visit (in the case of residents within the Area)
Race/ethnicity(includes Gypsies and Travellers),	No special provisions required
Sex and gender	No special provisions required
Gender identity	No special provisions required
Religion and belief	No special provisions required
Sexual orientation	No special provisions required
Pregnant women, new and breastfeeding mothers,	No special provisions required
Marriage and civil partnership	No special provisions required

8. Supporting information

What background information will be provided for consultees and in what format?

The Annual Status Report, and a summary of it, will be available on the Council's website. A copy of the summary will be included with the letters to the households within the area.

9. Publicity

How will consultees be made aware of the consultation and the results?

Please see section 6. The final report will be to Executive and Full Council with the decision being published on the Council’s website (with minutes of the meetings).

10. Accessibility

How will you ensure that consultation material meets accessibility and readability standards? (See intranet)

The accessibility and readability standards will be adhered to.

11. Demographics

What demographic data, if any, will be collected on consultees?

None

12. GDPR

If personal data is being collected, confirm that this has been agreed with the Data Protection Officer and that an appropriate privacy statement is included in any surveys.

None

13. Resource implications

Set out which internal resources will support this consultation or provide details of external resource requirements and means of funding.

The consultation will be undertaken within existing resources.

14. Carbon Footprint (Environmental) Implications:

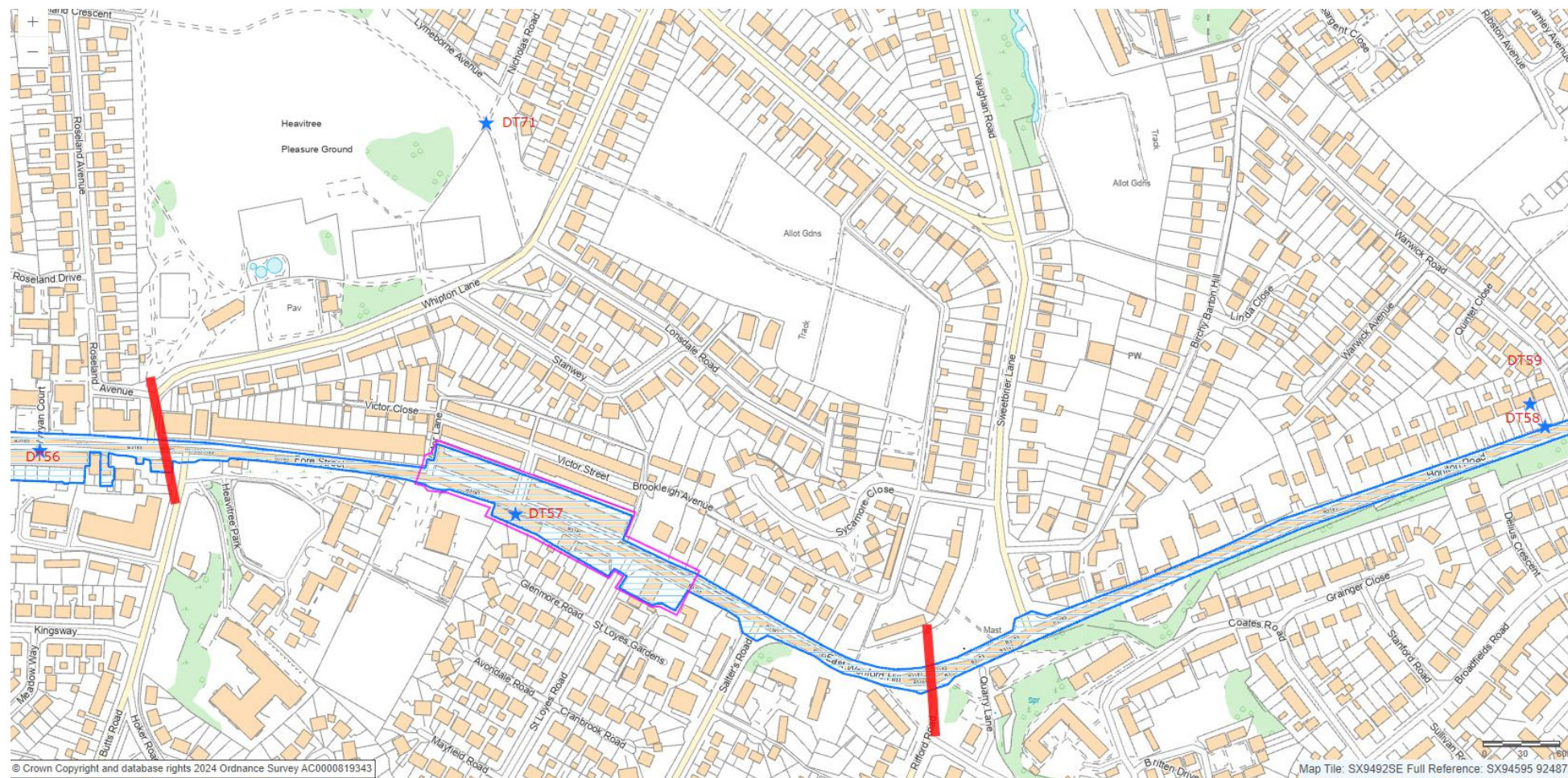
How are carbon/environmental impacts arising from the consultation being addressed?

The subject of the consultation has been brought about as a result of improving levels of traffic pollution.

15. Approval

Service Lead		Corporate Manager (Executive Support)	
Name		Name	
Signature		Signature	
Date		Date	

Figure F.10 – Map Showing Relevant Diffusion Tube Locations



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The existing AQMA boundary is shown in blue, with the proposed new boundary drafted in purple.

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Proposed New AQMA Order



Environment Act 1995 Part IV Section 83(1)

The Exeter Air Quality Management Area Order 2025

Exeter City Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order:

1. This Order may be cited/referred to as the Exeter Air Quality Management Area Order 2025 and shall come into effect on [date TBC].
2. The area shown on the attached map in red is to be designated as an air quality management area (the designated area), incorporating a section of East Wonford Hill. The map may be viewed at the Council Offices. This Area is designated in relation to a likely breach of the nitrogen dioxide annual mean objective as specified in the Air Quality Regulations 2000.
3. This Order shall remain in force until it is varied or revoked by a subsequent order.
4. The Exeter Air Quality Management Area 2010 shall be varied accordingly.

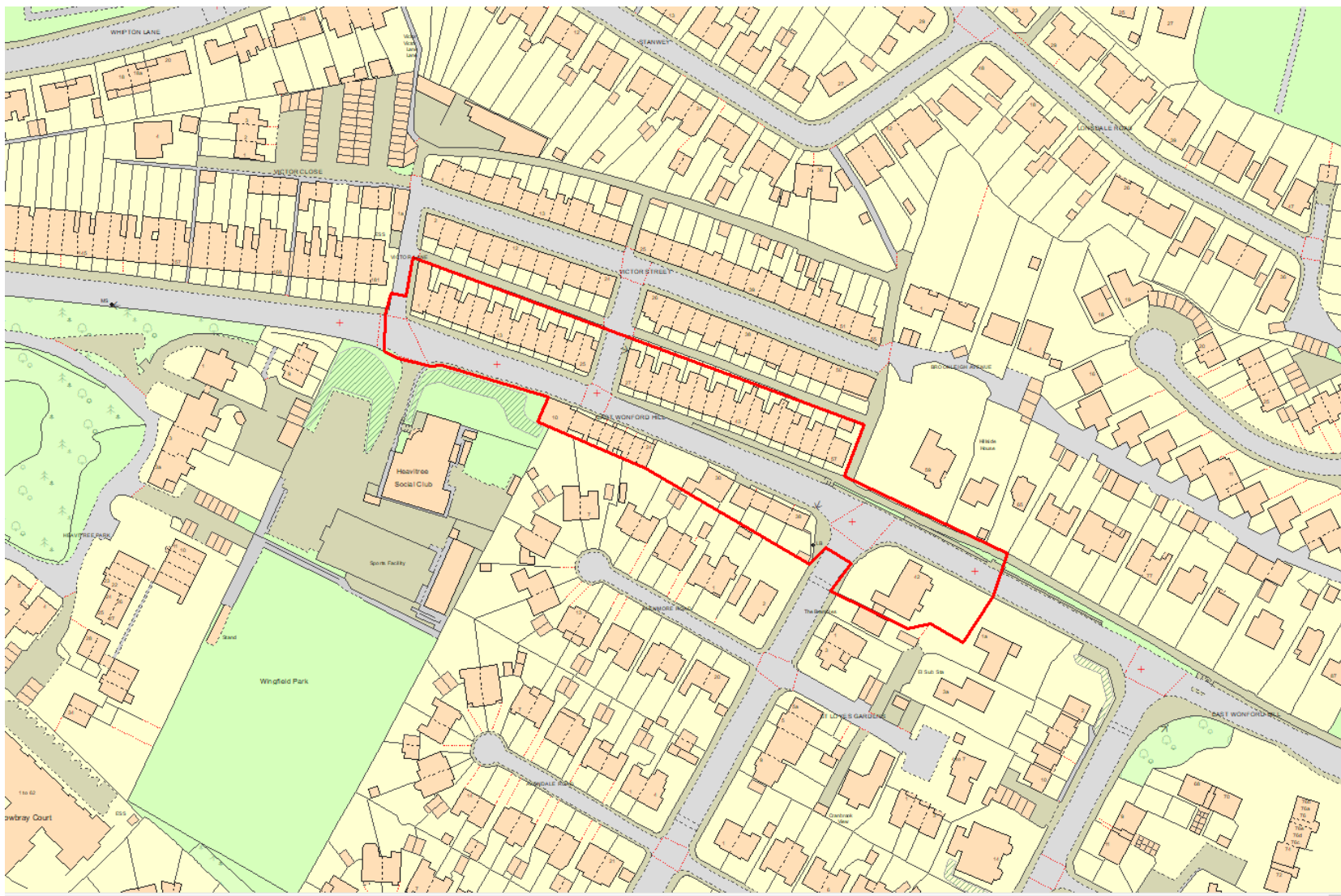
Dated the [date]

The Common Seal of Exeter City Council was hereunto affixed in the presence of:

A duly authorised signatory

Seal no.

The Exeter Air Quality Management Area



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Appendix F: Equalities Impact Assessment for the Annual Status Report, including proposed variation of the AQMA Order

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date	Report Title	Decisions being recommended	People with protected characteristics potentially impacted by the decisions to be made
This report will form part of a report to Scrutiny and Executive Committees after submission to DEFRA. It is anticipated that this will be in September and October 2024.	Annual Status Report 2024	To amend the Air Quality Management Area (AQMA) Order so that it includes a significantly reduced area and so that the exceedance of the short term nitrogen dioxide objective is no longer included	No negative impacts identified

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Positive / No Impact		This change can occur because of a reduction in nitrogen dioxide concentrations such that a far smaller area of the city is above the health-based objectives for this type of pollution. This means that the health effects of nitrogen dioxide will be reduced. It also means that a more focussed new Air Quality Action Plan (AQAP) can subsequently be produced. This will bring about further improvements in air quality and subsequently health. Any necessary restrictions or changes in the new plan can be limited to the region of the much smaller new AQMA if appropriate. (The new Action Plan will be subject to a further EQIA during its development).
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Positive		Poor air quality has a greater effect on vulnerable persons, such as the very young, the very old and those with pre-existing health conditions.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Sex/Gender	Positive / No Impact		As above
Gender reassignment	Positive / No Impact		As above
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Positive / No Impact		As above
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Positive / No Impact		As above

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive		Poor air quality has a greater effect on vulnerable persons, such as the very young, the very old and those with pre-existing health conditions.
Pregnancy and maternity including new and breast feeding mothers	Positive		Poor air quality has a greater effect on vulnerable persons, such as the very young, the very old and those with pre-existing health conditions.
Marriage and civil partnership status	Positive / No Impact		As above

Actions identified that will mitigate any negative impacts and/or promote inclusion

- None required

Officer: Alex Bulleid

Date: June 2024

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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
ASR	Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by National Highways
EU	European Union
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO ₂	Sulphur Dioxide
O ₃	Ozone
DCC	Devon County Council
ECC	Exeter City Council
GESP	Greater Exeter Strategic Plan
ECF	Exeter City Futures
SELDP	Sport England Local Delivery Pilot

References

- Local Air Quality Management Technical Guidance LAQM.TG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Policy Guidance LAQM.PG22. August 2022. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Chemical hazards and poisons report: Issue 28. June 2022. Published by UK Health Security Agency
- Air Quality Strategy – Framework for Local Authority Delivery. August 2023. Published by Defra.
- [Exeter City Council 2019. Exeter Air Quality Action Plan 2019-2023.](#)
- Exeter City Council 2023. Exeter Air Quality Annual Status Report.
- Diffusion Tubes for Ambient NO₂ Monitoring: Practical Guidance for Laboratories and Users 2008
- [National bias adjustment factor spreadsheet.](#)
- [Devon Local Transport Plans.](#)

Local Authority:	Exeter City Council
Reference:	ASR24-2181
Date of issue	July 2024

Annual Status Report Appraisal Report

The Annual Status Report (ASR) sets out new information on air quality obtained by Exeter City Council (ECC) as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

ECC currently has one Air Quality Management Area (AQMA). ‘Exeter AQMA 1’ was first declared in March 2005 for exceedances of the NO₂ annual mean Air Quality Objective (AQO). The AQMA was amended in May 2011 to include exceedances of the NO₂ 1-hour mean AQO. ECC is proposing to amend the boundaries of the AQMA so that the area of the AQMA is reduced to just an area of exceedance on East Wonford Hill (around the location of monitoring site DT57). We advise ECC to wait until compliance has been achieved in 2022, 2023 and 2024 in the areas where ECC are proposing to remove the AQMA, before proceeding with plans to amend the AQMA. The current Air Quality Action Plan (AQAP) is due to expire at the end of 2024, but ECC do plan on publishing a new AQAP which focuses on the amended AQMA.

ECC undertook automatic monitoring at two sites, and non-automatic NO₂ diffusion tube monitoring at eighty-four sites in 2023. No changes to the monitoring network were made by ECC in 2023. In 2023, one exceedance of the NO₂ annual mean AQO was recorded, at monitoring site DT57 (located inside the AQMA, on East Wonford Hill) which recorded a concentration of 40.5µg/m³ (representative exposure) which is an increase of 0.1µg/m³ over the concentration of 40.5µg/m³ recorded at the same monitoring site in 2022.

The highest NO₂ annual mean concentration recorded outside of a AQMA is at monitoring site DT39 (located on Union Road, in the Stoke Hill area) which recorded a concentration of 26.9µg/m³ which is a decrease of 0.9µg/m³ over the concentration of 27.8µg/m³ recorded at the same monitoring site in 2022. The general trend in NO₂ annual mean concentrations is mixed with some monitoring sites recording in increase in concentrations between 2022 and 2023, and others recorded a decrease in concentrations over the same time scale. The average change in NO₂ annual mean concentrations between 2022 and 2023 is an increase of 0.2µg/m³.

The largest increase in NO₂ annual mean concentrations was recorded at monitoring site DT52 (located on Fore Street, inside the AQMA) which recorded a concentration of 34.7µg/m³ (representative exposure) in 2023 which is an increase of 2.4µg/m³ over the concentration of 32.3µg/m³ recorded at the same monitoring site in 2022. The largest decrease in NO₂ annual mean concentrations was recorded at monitoring site DT12 (located on Magdalen Street, inside

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the AQMA) which recorded a concentration of 18.7µg/m³ (representative exposure) in 2023 which is a decrease of 4.2µg/m³ over the concentration of 22.9µg/m³ recorded at the same monitoring site in 2022. No other exceedances of any other relevant AQOs were recorded in 2023.

QA/QC procedures have been applied, with a national bias adjustment factor being used. ECC uses Gradko International for the supply and analysis of the NO₂ diffusion tubes, which are prepared with 20% Triethanolamine / De-ionised water. This factor was used as the data collection at monitoring site CM1 (which has a continuous analyser) was low so a local bias adjustment factor could not be calculated. No distance correction was required at any monitoring site in 2023. Annualisation was required at monitoring site CM1 (as a data capture rate of below 75% was recorded). After annualisation, the PM₁₀, PM_{2.5}, NO₂, and O₃ annual mean concentrations remained below the relevant AQOs.

The ASR discusses what measures within the AQAP were completed or progressed within the reporting year of 2023 which range from the installation of the large solar array (with battery storage) at Water Lane (which is intended to power the first three of an intended fleet of electric refuse collection vehicles) to the delivery of a new city centre bus station (to provide improved facilities to public transport users in the city). The ASR discusses what measures ECC expects to be completed or progressed over the course of the next reporting year which range from the delivery of a low traffic neighbourhood on Water Lane (through the redevelopment of brownfield land) to all new vehicles entering ECC's fleet being likely to be electric (unless there is no availability of vehicles meeting the specific operational requirements on the market).

On the basis of the evidence provided by the local authority the conclusions reached in the report are **accepted** for all sources and pollutants. Following the completion of this report, Exeter City Council should submit an Annual Status Report in 2025.

Local Authority:	Exeter City Council
Reference:	ASR24-2181
Date of issue	July 2024

Commentary

The report is well structured, detailed, and provides the information specified in the Guidance. The following comments are designed to help inform future reports:

1. There is good quality discussion on NO₂ annual mean results and trends. This is encouraged for future reports.
2. There are good quality figures showing monitoring site locations and AQMA boundary. This is encouraged for future reports.
3. There is a good quality review on the amendment of the AQMA.
4. The valid data capture for the monitoring period is missing from Tables A.3 - A.9. This should be corrected for future reports.
5. Some of labels on Figure D.1 showing the locations of the monitoring location could be made clearer so that it is easier for the reader to see and understand.
6. The title of some of the columns don't match between the excel template (both blank and filled in), and the same tables contained within the ASR report. This should be corrected for future reports.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:
 Telephone: 0800 0327 953
 Email: LAQMHelpdesk@bureauveritas.com

The [Air Quality Hub](#) is now run by Defra, it is a free online information and knowledge sharing resource for local authority air quality professionals. Please consider onboarding on the Air Quality Hub to access a multitude of air quality resources and be kept up to date with local authority air quality activity and air quality news.

Local Authority:	Exeter City Council
Reference:	ASR24-2181
Date of issue	July 2024

Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAppraisals@aecom.com

Comments on appraisal/Further information:

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Interim Joint Director – Environment, Waste and Operations

Title: Food Law and Health and Safety Enforcement Service Plan 2024 - 2025

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To seek approval for the adoption of the Food Law and Health and Safety Service Plan 2024-25. This statutory plan sets out the Council's regulatory function in respect of food safety and health and safety over the forthcoming year.

2. Recommendations:

2.1 That Executive supports the Food Law and Health and Safety Service Plan 2024-25

2.2 That Council approves:

a) the Food Law and Health and Safety Service Plan 2024/25; and

b) the Head of Environment and Waste is authorised to change the plan in the light of national guidance and/or to meet operational needs.

3. Reasons for the recommendation:

3.1 The Food Standards Agency Framework Agreement requires the Council to produce a Food Law Enforcement Plan (referred to as the Enforcement Plan). The key aim of the plan is to demonstrate how the Council will fulfil its regulatory obligations in respect of its food safety service.

3.2 Section 18 of the Health and Safety at Work, etc. Act 1974 places a duty on the Council to make adequate arrangements for enforcement of health and safety. The Health and Safety Executive (HSE), requires the Council to produce an annual Health and Safety Service Plan. Responsibility for Health and Safety at Work enforcement lies with the HSE and Local Authorities (LAs). Councils are generally responsible for enforcement at premises in which non-industrial activities are undertaken (e.g. retail premises, warehouses, offices etc.) whilst HSE is responsible for industrial activities.

3.3 The Food Law and Health and Safety Service Plan Statutory Service Plan incorporates:

- the service aims and objectives;
- the Action Plan for 2024/25; and
- the financial arrangement for providing the service.

4. What are the resource implications including non financial resources

4.1 The Action Plan will be carried out within the existing resource allocation as detailed in both the Statutory Service Plan and Revenues and Estimates for 2024/25.

4.2 There are no reductions, restructuring and/or redundancy implications as the key changes identified in this report do not give rise to any additional resource requirements as changes are to existing processes. However, in delivering to the changed requirements there may be some training implications for existing staff.

4.3 To aid succession planning of the service and to bring people into a career in local government and environmental health, the Business Regulation Team has turned a part time Environmental Health Officer role into a 4-year apprenticeship. This has been funded from existing budgets, with training aspects paid for by the apprenticeship levy. This positive move will allow the experienced staff within the service help develop a new Environmental Health Officer into the profession.

5. Section 151 Officer comments:

5.1 There are no additional financial implications for Council to consider.

6. What are the legal aspects?

6.1 The Food Standards Agency Framework Agreement requires the Council to produce a Food Law Enforcement Plan (referred to as the Enforcement Plan). The key aim of the plan is to demonstrate how the Council will fulfil its regulatory obligations in respect of its food safety service. In the current Framework Agreement and Code of Practice, the Food Standards Agency indicates that full compliance with all inspection frequencies will be expected.

6.2 Section 18 of the Health and Safety at Work, etc. Act 1974 places a duty on the Council to make adequate arrangements for enforcement of health and safety. The Health and Safety Executive (HSE), requires the Council to produce an annual Health and Safety Service Plan. Responsibility for Health and Safety at Work enforcement lies with the HSE and Local Authorities (LAs). Councils are generally responsible for enforcement at premises in which non-industrial activities are undertaken, whilst HSE is responsible for industrial activities.

7. Monitoring Officer's comments:

7.1 Members will note that the Food Law Enforcement Plan is required as a matter of law. The proposals for provision of the plan are set out in this report.

8. Report details:

Key Achievements in 2023/24:

8.1 Programmed Interventions

The service inspected 399 food businesses during the year, prioritising those which were either considered high risk or that were new businesses that had not received a previous inspection by the service.

99% of food premises within the city were found to be broadly compliant with food hygiene law.

During the year 179 new food businesses were received by the service

102 proactive health and safety inspections were undertaken

8.2 Service Requests / other interventions

The service is responsible for investigating complaints relating to food safety, health and safety regulation, infectious disease control and also for providing health promotion and training activities for businesses. 280 such requests were received by the service during 2023/24.

105 other visits and interventions were made to businesses.

117 accident reports from businesses have been received and looked into

The service also responded to 451 service requests received that related to noise nuisance, light pollution, business related Anti-Social Behaviour and other public health issues that have an impact on the delivery of the service plan.

8.3 Sampling

The authority participates in national and local food-sampling initiatives to monitor the quality of food on sale in the City, which is classified as satisfactory, unsatisfactory, or unacceptable. Additional samples are taken in response to food complaints and where it is alleged a premises or foodstuff is implicated in a food poisoning incident.

126 food samples were conducted along with 6 monthly sampling of all swimming pools within the city.

8.4 Control and Investigation of Outbreaks and Food Related Infectious Diseases

The service is responsible for the investigation of outbreaks and food related infectious diseases in the City.

Whilst the service has adequate resources to deal with its workload on a day-to-day basis large scale outbreak requiring an extensive investigation put pressures on the service which can have an impact on the completion of the annual service plan.

96 infectious disease notifications were received by the service in 2023/24, Campylobacter remains the most common cause of bacterial foodborne illness in the UK.

8.5 Primary Authority

Primary Authority Partnerships enables businesses and local authorities to enter into a legally recognised partnership on a cost recovery basis. The advice provided by the local

authority has to be taken into account by other councils before enforcement action can be taken against the business concerned.

The service currently has 7 active Primary Authority Partnerships which are based in and around the city. In these partnerships, Environmental Health plays the role of a 'critical friend' rather than the traditional role of regulator, identifying, develops and delivers services that help the business to successfully grow and improve. We work closely with the business to fully understand how the business operates and to understand its individual needs.

A full list of the current partnerships can be found at section 5.5 of the Service Plan

8.6 Proposed key activities for 2024/25

8.6.1 Maintain high standards in food safety by:

- Following the FSA's post Recovery Plan guidance by applying a risk-based and intelligence led approach to the prioritisation of food interventions. Interventions for higher risk businesses or those that are likely to be high-risk will always take priority over interventions for lower risk businesses.
- Continuing to maintain high level (>97%) of broadly complaint food businesses in the city.
- Enhanced coaching/sampling/training for non-complaint businesses, with caution/prosecution as final action for those who continually flout the law.
- Continuing with an intelligence-led food sampling programme.
- Building our customer base for taught Level 2 food hygiene courses whilst promoting e-learning to those who prefer to learn that way.
- Recognising food business trends such as the growth of home/mobile catering and internet sales and offering hygiene guidance and advice in an appropriately accessible format.

8.6.2 Promote safer workplaces by

- Focussing on the duty to manage asbestos, commercial gas safety and outdoor electrical safety during routine food hygiene inspections whenever appropriate.
- Continuing to conduct water quality sampling of swimming pools and private water supplies.
- Co-ordinate multi-agency visits where migrant worker/modern slavery issues are suspected or identified.
- Review and refresh the means of business engagement and training using innovative means to help business grow and thrive.
- To investigate further Primary Authority Partnership opportunities for the service.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Food Law and Health and Safety Service Plan 2024-25 contributes to all aspects of the Council's Corporate Plan.

10. What risks are there and how can they be reduced?

10.1 The Service Plan specifies targets and priorities to manage risk and establishes staffing levels to achieve the necessary outcomes. The main risk of not achieving the areas outlined in the service plan will be that of public safety, which could lead to serious injury, ill health, or death.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act and an Equalities Impact Assessment has been included in the background papers for Member's attention.

12. Carbon Footprint (Environmental) Implications:

12.1 There are no carbon footprint implications identified in this report.

13. Are there any other options?

13.1 The Food Law and Health and Safety Service Plan must be reviewed on an annual basis as there is a legal duty for the food safety and health and safety elements to be reviewed annually.

Interim Joint Director – Environment, Waste and Operations, Simon Lane

Author: Simon Lane – Head of Environment and Waste

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

- 1) Legislative and Regulatory Reform Act 2006

- 2) Food Law Code of Practice
- 3) Standard for Health and Safety Enforcing Authorities
- 4) HSC Enforcement Policy Statement
- 5) The Regulatory Enforcement and Sanctions Act 2008
- 6) Regulator's Compliance Code

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275



Exeter
City Council

Environment and Waste

Food Law and Health and Safety Enforcement Service Plan

2024 – 2025

Drawn up in accordance with the

- Food Standards Agency Framework Agreement
- National Local Authority Enforcement Code
- Regulators' Code

Issued by: Simon Lane, Head of Environment and Waste

Issue date: September 2024

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1 Introduction

1.1 Introduction

1.1.1 This document forms the basis of the business regulation enforcement functions for the authority and ensures that statutory provision for food law and health and safety enforcement is addressed along with locally identified needs.

1.1.2 The Council has a duty to act as an enforcing authority for food safety and health and safety in premises for which it is responsible. The plan outlines how the Council will undertake that function.

1.1.3 The service plan will help to ensure that the actions of the Council are fair, consistent, open and effective.

1.1.4 The Council recognises the important role it plays promoting and securing the safety and health of those who live, work and visit the city of Exeter. The key aim of this plan is to demonstrate how the Council will fulfil its statutory obligations in accordance with national guidance set out by the respective regulatory agencies. It includes:

- the Council's aim and objectives;
- information around enforcement services provided by the Council;
- details of the Council's performance management systems;
- information on the performance of the Council

1.2 Access to services

1.2.1 The Environment and Waste Service is based in the Civic Centre, Paris Street. Service users may contact officers on site or by leaving a message in the following ways:

- online via the Council website;
- in person by appointment at the Customer Service Centre in Paris Street;
- by telephone, 01392 265147 between 09:00am and 5.00pm Monday to Friday;
- whilst there is no formal out of hours service, staff can be contacted in the event of an emergency through the Council's Control Room on 01392 267888 by means of a telephone service;
- by email at environmental.health@exeter.gov.uk

2 Service aims and objectives

2.1 Aims and objectives

2.1.1 The Council's Corporate Plan sets out priorities that aim to meet the needs of our citizens and customers. The priorities are:

- Net Zero Carbon City
- Healthy and Active City
- Great Homes and Neighbourhoods
- Thriving Local Economy
- Leading a well-run council

The corporate plan is available by visiting www.exeter.gov.uk/corporateplan.

2.1.2 In respect of food safety and health and safety the objectives of the Council will:

- undertake appropriate and meaningful regulatory interventions at business and residential premises for which the Council is the enforcing authority and institute informal or formal action in accordance with the Enforcement Policy, Local Government Regulation and national government guidance produced by the Food Standards Agency, Health and Safety Executive and current good practice. Businesses will be targeted, focusing resources on those presenting a high risk to health, the environment or public safety with a view to securing an improvement in legislative compliance;
- investigate complaints about food businesses and premises for which the Council is the enforcing authority for health and safety; at the conclusion of investigations, institute informal or legal action as appropriate;
- provide appropriate training and education to local businesses to assist them to meet legislative requirements;
- investigate cases of food-borne and some other infectious diseases and advise upon appropriate precautionary and control measures;
- issue registrations for skin-piercing premises and individuals, monitoring compliance with relevant conditions;
- sample and arrange for microbiological testing of high-risk food products and premises;
- develop Primary Authority partnerships, where relevant, with local businesses;
- provide advice and assistance to businesses to help them comply with legislation and to maintain high standards and
- work in partnership with related organisations to promote the wellbeing of persons living, working or visiting the city.

2.2 Links to corporate purposes and other local and national strategies and plans

2.2.1 The Environment and Waste Service aims to uphold the core values of how the council works, making sure that they underpin our attitudes and behaviours. Accordingly, we will:

- Meet customers' needs with high-quality services.
- Be flexible and have a can-do approach.
- Show trust and respect.
- Tell people what is going on, listen and respond to their views.
- Be proud to work for the city and the council.

2.2.2 The following represent key aims for the service. The service:

- embraces the principles of excellence in public services and better regulation and will look to make the most effective use of available resources to achieve maximum gain;

- implements the requirements of the Food Law Code of Practice (England) - actively promoting and evaluating the use of effective food safety interventions to facilitate compliance with food law;
- recognises the importance of food and its influence on the wider determinants of health; seeking to work in partnership and play an active role to reduce the inequalities in health in the local population;
- recognises the importance of the National Food Hygiene Rating Scheme which gives each premises a numerical rating based on their food safety management system, structure and confidence in management - this scheme is an important tool in maintaining high compliance of businesses with food hygiene law;
- continues to develop new ways to establish and maintain an effective health and safety culture in the city so that all employers take their responsibilities seriously, the workforce is fully involved, risks are properly managed and employees are protected;
- actively seeks to work with other areas of the Council, businesses and individuals to ensure that economic development within the city is maintained;
- targets work to manage the risk in high-risk, poor-performing and rogue trader businesses. It will be proportionate, consistent and transparent and have suitable monitoring and review systems and
- is mindful of the burdens on local businesses particularly where, for example, the economy is seasonal and subject to fluctuation. The Council will work in partnership with national regulators, local partners and with local businesses offering information, advice and assistance.

2.3 Links to Health and Wellbeing Priorities and Other Plans

2.3.1 The Devon Health and Wellbeing Board has 4 strategic priorities:

- Create opportunities for all-inclusive economic growth, education and social mobility.
- Healthy, safe, strong and sustainable communities creating conditions for good health and wellbeing where we live, work and learn.
- Focus on mental health building good emotional health and wellbeing, happiness and resilience.
- Maintain good health for all supporting people to stay as healthy as possible for as long as possible.

2.3.2 Whilst there are no specific regulatory targets set out in the above, enforcement will contribute to raising business standards, improving health outcomes and reducing health inequalities through the delivery of relevant services, in partnership with other agencies.

2.3.3 In addition to this service plan, the service is also responsible for or contributes to the following strategies, policies and plans:

- The Council Enforcement Policy
- The Environmental Strategy

- The Carbon Management Plan
- The Air Quality Strategy
- The Air Quality Action Plan
- The Licensing Act 2003 Statement of Licensing Policy
- Exeter City Council Corporate Plan
- The Exeter Community Safety Partnership Strategy
- Gambling Act 2005 Policy
- Street Trading Policy

3 Background

3.1 Profile of Exeter City Council

- 3.1.1 The geographical enforcement area is relatively confined in local authority terms covering an area of 4,774 hectares and supporting an estimated residential population of 134,500 persons with 72.8% of working age.
- 3.1.2 There are a total of 5,147 businesses registered for business rates.
- 3.1.3 Approximately 35,000 people commute to Exeter on a daily basis, with an average footfall in the city centre of 1,364,000 people per month.
- 3.1.4 Exeter comprises of a mix of residential and commercial properties as well as industrial and trading estates. With Exeter being the regional administrative, cultural and educational centre, the city has a significant impact on the adjacent areas of East and Mid Devon and Teignbridge.
- 3.1.5 Although set in a predominantly urban area the city offers only a limited range of industry with the main activities being catering, retail sales, office activities, warehousing and distribution. A pie manufacturer supplying products on a national scale opened for business in March 2024. There is an increasing variety of ethnic food outlets and fast-food takeaway outlets and the food pattern is dynamic.
- 3.1.6 The city's status as a medical, university, and educational centre means that there are several large institutional catering premises located within the boundary.
- 3.1.7 There are two approved establishment in the city – the pie manufacturer mentioned above and a wholesaler re-wrapping meat and dairy products.
- 3.1.8 Exeter was once a thriving port but the River Exe and ship canal are now used for leisure, rather than trade – the city is no longer a port health authority. Exeter airport is situated within East Devon District Council.

3.2 Organisational Structure

- 3.2.1 Environment and Waste is within the Portfolio of Services overseen by the Strategic Director Communities. The Head of Environment and Waste is responsible for delivering this Service Plan. The Environment and Waste Service provides:
- the Food Safety Enforcement function;
 - the investigations of notifiable / infectious disease;
 - the Health and Safety Enforcement function;
 - the Private Water Supply Enforcement function;
 - the Health Act Enforcement function;

- Sunbed Regulations Enforcement function;
- Licensing duties in relation to Licensing Act 2003, Gambling Act 2005, taxis and miscellaneous legislation;
- Regulation of premises under the Environmental Permitting Regulations;
- Monitoring of the city's air quality;
- Monitoring and guidance with respect to contaminated land;
- Investigation of complaints relating to business nuisance;
- Co-ordination of the council's anti-social behaviour function;
- Co-ordination of the multi-agency Community Safety Partnership
- Regulation of Private Sector Housing which includes Mobile Home Parks
- Housing Grants and Loans
- Fuel Poverty Strategy

3.2.2 The Head of Environment and Waste has various delegations to act on behalf of the Council, with delegated deputies appointed under the Council's constitution. All non-delegated matters are reported to the appropriate committee.

3.2.3 The officer structure in respect of the service is detailed in Appendix A and the Council's committee structure is detailed in Appendix B.

3.2.4 In consultation with the Head of Legal and Democratic Services, the Head of Environment and Waste is authorised to deal with the provisions and enforce compliance with legislative areas delegated to the post. This includes the initiation, defence and settlement of legal proceeding, issuing of formal cautions and fixed penalty fines, service of Notices and Orders, the issue, refusal and revocation of licences, certificates and registrations, carrying out works in default and payment and recovery of costs.

3.2.5 The Council's Head of Legal and Democratic Services has delegated authority for the initiation, defence, settlement and conduct of any legal proceedings that may affect the interests of the Council or the inhabitants of the City.

3.2.6 Specialist analytical and microbiological services are provided by external agencies such as the UK Health Security Agency, South West Water and Public Analyst Scientific Services.

4 Performance

4.1 Food Safety performance

4.1.1 During 2023/24, the service:

- Registered 179 new food businesses,
- Conducted 399 food hygiene inspections,
- Received 174 service requests relating to food businesses, of which 101 were complaints about food and 73 concerned the hygiene of premises,
- 4 requests for food hygiene rating scheme revisits were received and the premises were subsequently revisited,
- 99% of food premises in the food hygiene rating scheme were broadly compliant with food hygiene law,
- 96 food poisoning cases and other infectious disease were investigated,

- 126 food samples were taken, 5 of which were unsatisfactory, 7 borderline,
- 77 people attended face-to-face Level 2 food hygiene training.

4.2 Health and Safety performance

4.2.1 During 2023/24:

- 102 proactive health and safety inspections were undertaken,
- 65 other visits/face to face contacts (e.g. health and safety training, Safety Advisory Group attendees etc.) were made,
- 51 non-inspection interventions (e.g. complaints, incident investigation, pool sampling visits) were made,
- 29 health and safety service requests / complaints were dealt with,
- 117 accident reports were received and looked into

5 Food Safety

5.1 Scope of the Food Safety Service

5.1.1 The Food Safety Service:

- undertakes programmed food hygiene interventions and revisits;
- registers all food businesses in the city (or approves those businesses supplying products of animal origin to persons other than the final consumer);
- monitors the database;
- undertakes food sampling;
- investigates food complaints;
- assists UK Health Security Agency in investigation of food poisoning and infectious disease outbreak control;
- responds to Food Standards Agency Food Alerts, product withdrawals and recalls;
- provides export health certificates;
- inspects food;
- runs advisory and training services for businesses and
- promotes food safety.

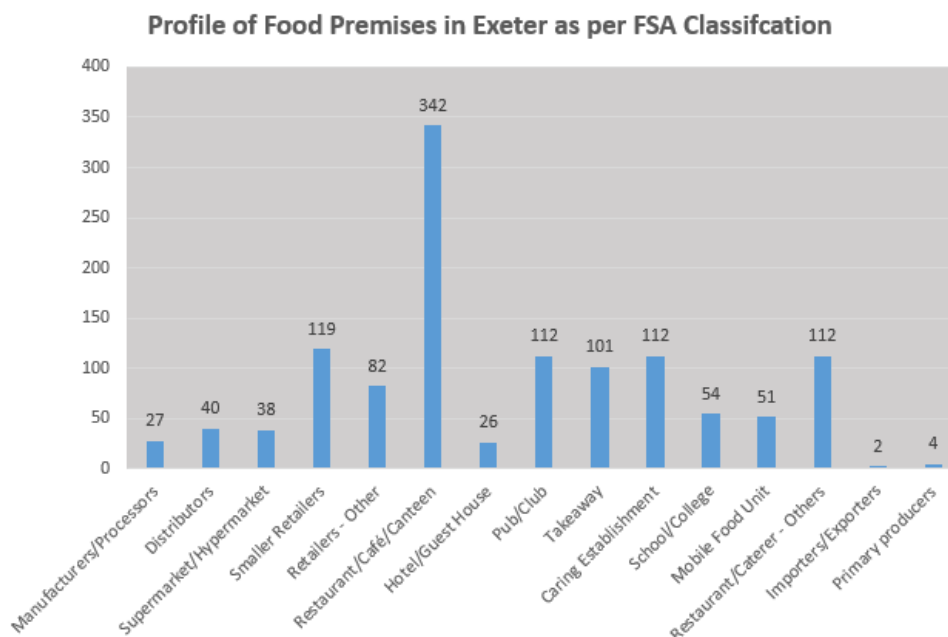
5.1.2 The Council believes in fair regulation and the team uses a variety of means to ensure that individuals and organisations meet their responsibilities including education, negotiation, advice, guidance, warning letters, formal notices and prosecution. Overall, the service seeks to work in collaboration with businesses while avoiding unnecessary bureaucracy in the way it works.

5.1.3 The Council supports the Food Standards Agency's *Food You Can Trust* strategy and its 3 guiding principles:

1. Food is safe.
2. Food is what it says it is.
3. Food is healthier and more sustainable.

5.2 Food Business Profile

5.2.1 The current profile of food premises in the city as per Food Standards Agency classification is illustrated below:



5.2.2 Following an inspection/audit, food premises are scored and categorised A to E in respect of the risk to food safety in accordance with the Food Law Code of Practice (England). The categories dictate the interval between inspections. For example, category A premises should be inspected at least once every 6 months, category D premises every 2 years.

5.2.3 The current profile of food premises in terms of risk category are shown below:

	A	B	C	D	E	U	Total
01 April 2024	1	41	136	600	423	55	1256

5.2.4 There are a small number of food premises in the city where business owners do not speak English as their first language. This can impact on the ability to successfully inspect premises and to effectively promote food safety. The Food Standards Agency provides food hygiene information in a number of languages to which food business operators will be signposted whenever appropriate. The Council also aims to provide food hygiene training in other languages if sufficient demand arises.

5.2.5 Some food business operators employ a number of migrant workers. Where appropriate, inspecting officers will look for evidence of modern slavery or inadequate accommodation/working conditions and share this intelligence with the appropriate agencies (Police, Border Force etc.).

5.3 Interventions

5.3.1 The Council will:

- carry out a range of official and other food controls as set out in the Food Law Code of Practice (England) and its associated Practice Guidance;
- inspect/audit and approve relevant premises in accordance with the relevant legislation, Code of Practice and centrally issued guidance;

- liaise with the Primary Authority of any company whose premises have been inspected and offences identified which are, or appear to be, associated with the company's centrally defined policies and procedures;
- assess the compliance of premises and systems to the legally prescribed standards having due regard to any relevant Industry Guides to Good Hygiene Practice and other relevant centrally issued guidance;
- take appropriate action on any non-compliance found, in accordance with the Council's Enforcement Policy and
- maintain documented intervention procedures and record legible data and information following interventions in a retrievable way.

5.3.2 Whilst the primary responsibility for identifying food hazards and controlling risks rests with food business operators, food hygiene interventions will be undertaken to:

- establish whether food is being produced hygienically;
- establish whether food is, or will be, having regard to further processing, safe to eat;
- identify foreseeable incidences of food poisoning or injury as a consequence of consumption of food;
- to issue the relevant rating as laid out in the Food Hygiene Rating Scheme Brand Standard, where the premises is part of the scheme.

5.3.3 With the foregoing in mind, the main objectives of the interventions programme will be to:

- determine the scope of the business activity and the relevant food safety legislation;
- thoroughly and systematically gather and record information;
- identify potential hazards and risks to public health;
- assess the effectiveness of process controls and HACCP (Hazard Analysis and Critical Control Point) based systems;
- identify specific contraventions of food safety legislation;
- consider appropriate enforcement action (proportionate to risk), to secure compliance with food safety legal requirements;
- produce advice and information and recommend good practice where appropriate;
- promote continued improvements in food hygiene standards to meet national / local performance indicators and the relevant Food Standards Agency strategy and
- issue the relevant rating as laid out in the Food Hygiene Rating Scheme Brand Standard, where the premises is part of the scheme.

5.3.4 Coronavirus restrictions from April 2020 onwards prevented the completion of a large number of planned food interventions. Introduced in July 2021, The Food Standard Agency's Recovery Plan set out how local authorities should resume food interventions post-Covid, the emphasis being on the inspection of higher-risk (category A-C) premises, with visits to lower-risk premises carried out where resources allowed.

5.3.5 The Recovery Plan ended in March 2023, the Council successfully meeting its targets. The Food Standards Agency is still keen to ensure that higher-risk premises (category A-C) are inspected as a priority and that new food registrations (category U) are triaged and inspected based on risk (a newly registered butchers' shop being inspected before a sweet shop, for example).

5.3.6 Since the end of the recovery Plan, the expectation of the Food Standards Agency is that local authorities realign their inspection work with the requirements of the Food

Law Code of Practice – for most local authorities (Exeter included) this mean bringing lower risk (category D&E) food businesses back into an appropriate programme of controls.

- 5.3.7 All 90 category A-C premises due an inspection between April 2023 to March 2024 received a visit; in addition, 160 category U premises were visited and rated.
- 5.3.8 The focus on inspecting higher-risk food premises (both new and existing) together with an ever-increasing number of service requests dealt with by the Business Regulation team (553 in 2023/24, compared to 408 in 2022/23 and 337 in 2021/22) means that, in common with many local authorities, the council carries a number of lower-risk food businesses (category D&E) which are overdue an inspection.
- 5.3.9 To this end, contract environmental health officers will be engaged to inspect a number of the outstanding D-category food businesses, with a view to bringing the inspection programme back in line with the Food Law Code of Practice by April 2025.
- 5.3.10 The very lowest-risk (category E) food businesses which are overdue an inspection will, in line with the Food Law Code of Practice, be dealt with using an alternative enforcement strategy. These businesses (which include the likes of greengrocers, sweet shops, chemists, off-licences etc.) will receive a food hygiene questionnaire, to be returned in lieu of a visit. This work can be undertaken by the council's Environmental Health Apprentices, allowing the Business Regulation team's EHOs to concentrate on inspecting higher-risk and unrated food businesses.
- 5.3.11 Where a category E business fails to complete a questionnaire, or where the information supplied on the questionnaire suggests a greater food safety risk than would be otherwise expected for this type of business, an inspection will be carried out.
- 5.3.12 After consultation, the Food Standards Agency's proposal for a new risk-based approach towards intervention frequencies that could see inspection frequencies ranging from every 2 months to every 5 years has gone back to the drawing board. The FSA's current focus is concerned with local authority capacity and capability – there are not enough qualified EHOs. Nationwide, 50% of local authorities report challenges around recruiting suitably qualified staff, many increasingly relying on contractors to carry out inspections.
- 5.3.13 For Exeter's Business Regulation Team, in order to achieve the inspection programme not less than 3 (FTE) qualified food inspectors will be required. This figure takes no account of the burden of any extra targeted inspection activity, sampling or investigations arising from complaints or Food Alerts, product withdrawals and recalls for example.
- 5.3.14 All officers undertaking inspections, investigating complaints, giving advice and taking samples shall meet the qualifications and experience requirements in the Food Law Code of Practice (England)
- 5.3.15 It is not envisaged that arrangements will need to be made to ensure the Council has access to specialist expertise for the inspection of any specialised processes located in the city.

5.4 Food Complaints

- 5.4.1 Food complaints received and investigated by the service fall into one of the following broad categories:
- food contamination;

- complaints about food businesses (poor hygiene, pests, lack of food handler training etc.) and
- food alerts, product withdrawals and recalls.

5.4.2 There is an established procedure for dealing with food complaints that sets out the action to be taken regarding investigation. The procedure, together with a food complaints investigation form, is available on RIAMS (The Council's online information management system).

5.4.3 The number of food complaints/service requests received annually has been at a constant level over the last few years.

5.4.4 It is estimated that 0.2 FTE qualified inspectors will be required to deal with food complaints.

5.5 Primary Authority Partnerships

5.5.1 The Regulatory Enforcement and Sanctions Act 2008 established a statutory scheme for businesses trading across local authority boundaries. The scheme known as the Primary Authority Scheme enables businesses and local authorities to enter into formal partnerships. The advice provided by the local authority has to be taken into account by other councils before enforcement action can be taken against the business concerned.

5.5.2 Primary Authority partnership agreements have been established with:

1. West Country Family Butchers Ltd.
2. South West Norse Ltd.
3. Andrew Brownsword Hotels
4. HK4 Group Ltd.
5. KM Innovations Ltd.
6. Fresha Ltd
7. Sacred Grounds (Exeter) Ltd.

5.6 Advice to Business

5.6.1 A full suite of food courses is promoted to enable local businesses to fulfil their training requirements. Taught courses and e-learning are both available. See Section 8 for more information.

5.6.2 Inspectors provide advice during routine interventions and respond to queries from the public and food businesses.

5.6.3 Advice on topics of general and current food safety interest is placed on the Council web site and social media accounts as necessary; recently this has included practical guidance for people running food businesses from home. Approximately a third of new food business registrations received over the past year are at private addresses.

5.6.4 The Council will use local business and other forums as a means to disseminate relevant food safety information to help assess their needs and obstacles to compliance.

5.6.5 The service will actively seek participation in or look to co-ordinate appropriate forums to promote food safety and disseminate information.

5.6.6 It is estimated that 0.1 FTE qualified food inspectors will be necessary to provide information and advice to food businesses.

5.7 Food Inspection / Sampling

5.7.1 The Council will ensure that food is inspected in accordance with relevant legislation, The Food Law Code of Practice (England) and the Practice Guidance (England) and centrally issued guidance and ensure that food meets prescribed standards.

5.7.2 UK Health Security Agency's Coordinated National Sampling projects are determined following consultation on various options with stakeholders. Local sampling studies are also organised via the Devon Food Subgroup.

5.7.3 The Council's sampling priorities are detailed in Section 7.

5.7.4 Routine sampling will be undertaken by the Environmental Health Officers supported by the Environmental Technical Officer. Activity reports will be submitted on a periodic basis. A procedure has been set up and implemented in respect of taking samples and the arrangements made for Analysis and Examination. A service level agreement is agreed annually between the Council UKHSA's Food, Water and Environmental Laboratory Service.

5.8 Control and Investigation of Food Poisoning Outbreaks and Food Related Infectious Disease

5.8.1 The service's objective in respect of the control of food related disease is to:

- contain the spread of any outbreak;
- identify the focus of infection;
- identify the causative organism/chemical;
- trace carriers and cases;
- trace the source of infection;
- determine the causal factors;
- recommend practices to prevent recurrence of disease and
- determine whether criminal offences have been committed.

5.8.2 Investigations into outbreaks of foodborne illness are carried out in consultation with and under the direction of UK Health Security Agency.

5.8.3 A Single Case Management Plan has been drawn up between UK Health Security Agency's SW Health Protection Team and Local Authorities. The plan outlines who will take the lead for investigating single cases of various notifiable diseases and the appropriate method in each case (letter, phone call, visit etc.). Case questionnaires have also been standardised across the district and are available on the Environmental Health Computer System.

5.8.4 The Principal Environmental Health Officer (Business Regulation) fulfils the role as lead officer in respect of infectious disease control and it is anticipated that adequate resources exist within the full complement of the Environment and Waste Service to deal with this service demand.

5.8.5 It is estimated that 0.1 FTE qualified food inspectors will be required to investigate outbreaks and food related infectious diseases.

5.9 Food Safety Incidents

- 5.9.1 The Council has and will maintain a computer system capable of receiving food alerts, product withdrawals and recalls and will implement the documented procedure for responding to food alerts and food safety incidents received from the FSA, in accordance with the relevant Food Law Code of Practice (England). The current informal out of hours contact arrangements will be used.
- 5.9.2 Documented responses to the outcome of appropriate food alerts will be in accordance with the adopted procedure.
- 5.9.3 In the event of any serious localised incident or a wider food safety problem, the Principal Environmental Health Officer (Business Regulation) will notify the FSA.
- 5.9.4 It is considered that adequate resources exist within the service to deal with this demand.
- 5.9.5 It is anticipated that 0.1 FTE will be required to deal with food hazard alerts.

5.10 Liaison with Other Organisations

- 5.10.1 The Council is committed to ensuring the enforcement approach it takes is consistent with other authorities. Regular dialogue on food enforcement matters and food related issues takes place with:
- Primary Authority business partners
 - Trading Standards
 - Southwest Food Liaison Group
 - Health Protection Advisory Group
 - Exeter and Heart of Devon Hoteliers & other appropriate business forums
 - Chartered Institute of Environmental Health (CIEH)
 - University of Exeter
 - Exeter College – regular food hygiene/health and safety talks to Hospitality and Catering Students
 - Other services within the Council (e.g. Planning & Building Control)
- 5.10.2 In delivering the food service, the Council recognises the increasing importance of partnership working. Examples of this include:
- consultation with businesses and community leaders;
 - participation in third party audits, joint sampling initiatives etc.;
 - identify funding opportunities;
 - development of food hygiene training;
 - providing focused training sessions on nutrition and
 - other food related subjects.
- 5.10.3 Numerous promotional activities also occur during the course of a typical year usually in response to need/requests from the different communities in Exeter, for example:
- presentations to schools, interested groups, professional bodies etc.
 - circulation of advisory leaflets or guidance notes in response to topical issues or changes in legislation.

5.11 Food Hygiene Rating Scheme and Food Safety Promotion

- 5.11.1 The service utilises many methods to promote food safety and increasingly is led by the developing body of research. Since April 2011, the service has operated the National Food Hygiene Rating Scheme which has helped drive improvements in food law compliance. As at April 2024, 1050 businesses fall within the scope of the scheme, with all ratings published on the national web portal at www.food.gov.uk/ratings and businesses encouraged to display stickers.
- 5.11.2 The service will continue to promote usage of the scheme by consumers by harnessing the power and influence of the local media, health promotion initiatives and public events. The service will also continue to encourage at the time of visits voluntary display of rating stickers at premises that fall within the scope of the scheme.
- 5.11.3 In April 2024, 99% of rated food businesses in Exeter are classed as ‘broadly compliant’, i.e. rated 3 or above:

FHRS Rating	Sep - 23	Oct - 23	Nov - 23	Dec - 23	Jan - 24	Feb - 24	Mar - 24	Apr - 24	May - 24
5 - Very good	952	916	900	894	885	879	882	882	883
4 - Good	121	126	126	127	130	130	127	129	127
3 - Generally satisfactory	29	28	31	32	32	31	31	29	30
2 - Improvement required	4	4	3	3	3	4	6	6	6
1 - Major improvement required	4	4	4	5	4	4	4	4	4
0 - Urgent improvement required	0	0	0	0	0	0	0	0	0
Total rated establishments	1110	1078	1064	1061	1054	1048	1050	1050	1050
Establishments with rating of 3 or better	1102	1070	1057	1053	1047	1040	1040	1040	1040
Awaiting inspection	50	49	54	50	49	50	56	59	60
Exempt	52	48	46	46	46	46	46	46	47
Sensitive	27	24	23	23	22	22	22	35	33
Excluded	27	27	28	31	32	27	27	27	32
Total establishments	1266	1226	1215	1211	1203	1193	1201	1217	1222

A small number of establishments are not included in the food hygiene rating scheme. Businesses not supplying food to the final consumer or those that are extremely low-risk and not generally recognised as food businesses are classed as *excluded* and *exempt* respectively. Businesses with sensitivities around publishing addresses (childminders, military establishments etc.) are classed as *sensitive*.

- 5.11.4 Food businesses rated four or below can request a revisit to rescore, for which a fee of £160 is payable. Once the completed application and fee is received, officers will carry out an unannounced inspection within three months.
- 5.11.5 Online food delivery services such as Deliveroo and Just Eat will not host businesses with poor food hygiene ratings; this (and the perpetual interest shown by local media in zero- and one-rated premises) is an important factor that businesses need to consider when it comes to maintaining good standards of food hygiene.

5.12 Internal Monitoring

Internal monitoring procedures to verify conformance with this Service Plan are well established and will be exercised. These include senior officer auditing, peer review and consistency exercises. Team meetings take place weekly in person.

5.13 Audit

- 5.13.1 The Council will participate in third party and peer review processes against this Service Plan and associated procedures. Maintaining consistency in food hygiene enforcement across the South West is a key role of the South West Food Liaison Group.

5.13.2 The Food Standards Agency has an annual programme of local authority food service audits. Exeter's policies and procedures for dealing with approved premises were subject to FSA audit in 2020; no significant issues were reported.

5.14 Other Services

5.14.1 The Service has responsibility for undertaking a parallel role in respect of other Environmental Health related legislation in commercial premises.

5.14.2 General (non-food related) complaint work will initially be undertaken by the service in accordance with the relevant procedure. Pest control treatment may be undertaken by officers from the section in liaison with the Environmental Health Officer, but only when it will not comprise future enforcement action.

5.14.3 The Business Regulation Team is responsible for enforcing environmental protection legislation when it relates to commercial activities. In 2023/24, the team received a total of 553 service requests; 60% of these (335) related to environmental protection matters, with 196 complaints about noise from commercial premises making up by far the greatest proportion of this figure.

5.15 Enforcement Policy

5.15.1 The Council's Enforcement Policy includes the principles contained in the Regulators' Code which the Council is committed to incorporating into its regulatory functions.

5.15.2 The Enforcement Policy will be subject to periodic review at which time amendments will be made to specifically reflect the requirements of the Food Standards Agency Framework Agreement on Local Authority Food Law Enforcement and other relevant and appropriate guidance.

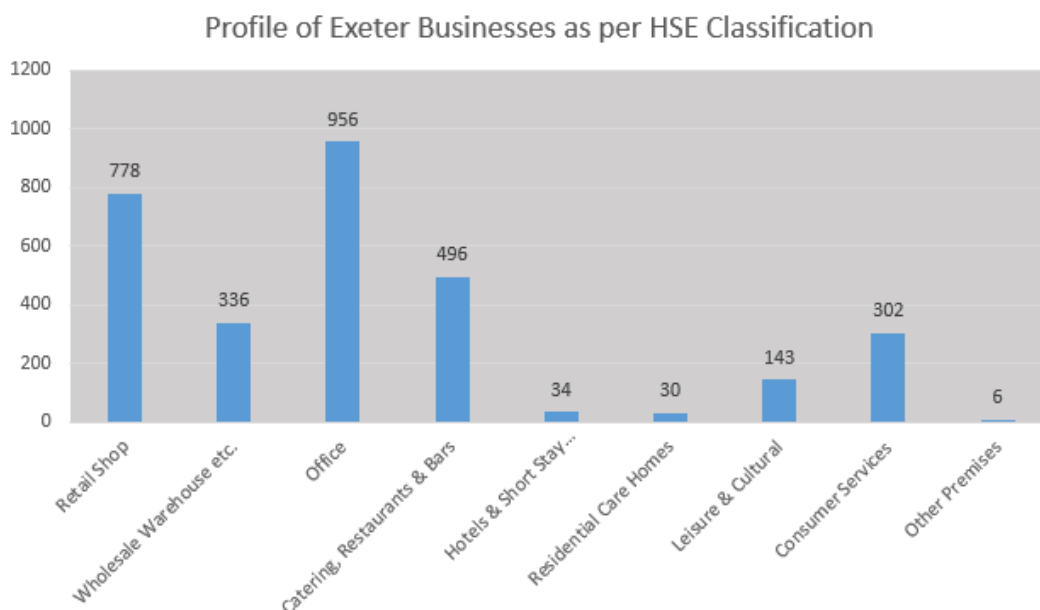
5.15.3 The key elements of the Enforcement Policy are detailed below:

- a belief that enforcement must be firm but fair;
- the need for proportionality in the application of the law;
- showing transparency about how the service operates;
- a need for targeting of enforcement action;
- a need to deliver consistency of approach and
- the need to balance enforcement and education in the way the service works.

6 Health and Safety

6.1 Health and Safety Business Profile

6.1.1 Exeter is predominantly an urban area with many small businesses. Health and safety enforcement is split between the Health and Safety Executive (who enforce the legislation in higher-risk businesses such as manufacturing and construction) and the Council who enforce health and safety in mostly small and lower risk businesses that are predominantly in the service sector. There is no requirement for non-food businesses to register with Environmental Health but as estimate, the Council is responsible for health and safety enforcement in around 3000 premises.



6.2 Health and Safety Intervention Programme

6.2.1 Health and Safety law clearly sets out that the primary responsibility for managing risk to workers and the public who might be affected by work activity lies with the business or organisation that creates the risk in the first place.

6.2.2 The role of the Council is to support, encourage, advise and where necessary hold to account businesses to ensure that they effectively manage the occupational health and safety risks they create. The service uses the guidance given in HELA Circular (67/2 Revision 13) to set its priorities and target its interventions.

6.2.3 As a result of current national and local drivers for change we aim to focus health and safety enforcement resources into areas where they are likely to have the greatest impact. In the coming year, we will continue to concentrate on specific topic areas during proactive interventions and reactive investigations, rather than complete all-encompassing inspections. The areas focussed on have been identified nationally and locally as contributing to the highest rate of accidents/incidents and ill health at work, across all health and safety enforcing authorities.

6.2.4 HSE's 2022 strategy *Protecting People and Places* sets out a number of strategic objectives, including reducing work related ill health with a specific focus on mental health and stress.

6.2.5 The Statement of Commitment between Local Authority and HSE Regulatory Services (March 2019) sets out a shared vision for co-regulatory partnership of this strategy.

6.3 Scope of Health and Safety Service

6.3.1 With regard to health and safety, the Council will be directed by the Health and Safety Executive's National Local Authority Enforcement Code issued under Section 18 (4)(b) of the Health and Safety at Work etc. Act 1974. The key elements of the code are:

- Ensuring that the authority takes a risk-based approach to regulation;
- Ensuring that the authority applies proportionate decision making in accordance with the LA's Enforcement Policy Statement and Enforcement Management Model;

- A requirement for the authority to legally appoint suitably qualified staff to carry out the necessary regulatory duties;
- A requirement to produce an annual service plan;

6.3.2 The objective of the health and safety service in contributing to this aim is to ensure that risks to person's health, safety and welfare from work activities are properly controlled through advice and proportionate enforcement.

6.3.3 The service comprises a range of key functions, namely:

- to carry out interventions in line with HELA Circular 67/2 (rev.13), the National Local Authority Enforcement Code and the Devon and Cornwall Health & Safety Subgroup's annual workplan;
- to take the most appropriate action upon inspection of relevant workplaces including the use of advice, informal correspondence, improvement and prohibition notices and the institution of legal proceedings.
- to educate proprietors of relevant workplaces in health, safety and welfare matters and their legal responsibilities in relation to their occupation by the distribution of leaflets and the provision of advice and information;
- to investigate specific accident notifications;
- to advise on the design of relevant workplace premises prior to and during alterations and construction;
- to liaise and work in partnership with the Health and Safety Executive (HSE), UK Health Security Agency and the Fire Authority regarding the enforcement of the legislation;
- to comply with the HSE'S National Local Authority Enforcement Code in respect of inspection programmes;
- seek to promote a simplified risk assessment procedure for low hazard workplaces such as offices and shops through the use of the Devon Local Authority devised toolkit Safer Workplaces, Better Business and
- to focus on emerging issues such as modern slavery and migrant workers, through liaison with the police and immigration authorities.

6.3.4 Proactive aspects of the health and safety service are often delivered jointly with other proactive services such as food hygiene inspections. For example, a current national enforcement intervention focusses on commercial gas safety – a matter discussed (where relevant) during food hygiene interventions. The reactive aspects of the service, for example accident investigations, are responded to along with other complaints and requests for service.

6.3.5 Health and safety interventions are delivered by suitably trained and experienced officers, in accordance with a competency and development scheme. This scheme has been designed to meet the requirements of Health and Safety Executive and Local Authority Enforcement Liaison Committee (HELA) Section 18 guidance.

6.3.6 External consultants may be used to undertake other intervention strategies of low-risk premises. The decision to employ contractors is taken by the Head of Environment and Waste and will be subject to the following criteria:

- there is a direct need to ensure statutory performance targets are met;
- external contractors must meet the requirements of HELA Section 18 guidance;
- the cost of the work can be met within existing budgets and
- previous knowledge of the competency and quality of the consultants.

- 6.3.7 There has been a reduction in proactive inspections, reflecting national priorities regarding better regulation. Equally, 2020 onwards saw a significant increase in Covid-related visits to premises, with officers carrying out a large number of spot-checks to ensure that suitable and sufficient risk assessments were in place and safe working methods demonstrated.
- 6.3.8 The health and safety service operates from the Civic Centre between 9.00am and 5.00pm Monday to Friday. Evening and weekend inspections are carried out as determined by the risk-based inspection programme and the premises opening hours.
- 6.3.9 Emergency health and safety issues are currently directed initially to a 24-hour central control team and then onto senior officers as required. In addition the Council's continually revised website is used to provide information about health and safety services for consumers and businesses and also provides a direct email address for service requests.

6.4 Complaints / Requests for advice / Advice to Business

- 6.4.1 Additional interventions will arise during the year by virtue of complaints, new business start-ups, change of use, major alterations/refurbishments and request for inspection. A revisit will always be carried out where statutory notices have been served, in all other cases the officer will make a professional judgement as to the requirement for a revisit.
- 6.4.2 From 1 July 2007, all enclosed workplaces became smoke free, as a result of the Health Act 2006 and subsequent regulations. All Environmental Health Officers, Technical Officers, Licensing Officers and Environmental Protection Officers are also authorised to enforce the smoke-free provisions. Smoke free compliance for businesses will be incorporated into the proactive inspection work undertaken by the service, in addition to responding to complaints.
- 6.4.3 The approach is therefore about focussing health and safety enforcement resources into areas where they are likely to have the greatest impact rather than completing all-encompassing inspections. This will fall in line with the principles advocated the Health and Safety Executive.
- 6.4.4 The above does not preclude the importance of providing wider guidance on health and safety compliance to new businesses and following specific service requests. Proactive health and safety education work will be suitably balanced against targeted enforcement activity.
- 6.4.5 The authority has a duty to investigate complaints about health and safety conditions/issues and about its health and safety service provision. A number of complaints/service requests about health and safety are received annually, all of which will be dealt with as appropriate or passed to other agencies.
- 6.4.6 No complaints have been received regarding the service provision of the Authority.
- 6.4.7 The service recognises the importance of providing advice to businesses as part of effective health and safety enforcement. As well as the provision of specific advice during interventions and with post intervention correspondence, a wide range of general health, safety and welfare advice is distributed to businesses.

6.5 Statutory Notifications

- 6.5.1 Prescribed accidents, dangerous occurrences and occupational diseases are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences

Regulations (RIDDOR) 2013. Accidents would include fatalities and accidents involving visits to hospital or currently more than 7 days off work. Certain accidents involving employees, the self-employed and members of the public are also reportable.

6.5.2 117 RIDDOR reports were received by the service in 2023/24.

6.5.3 The Council has a duty to investigate accidents to determine whether offences have been committed and to prevent a recurrence. The authority also receives notifications of certain unsafe equipment and must respond and investigate such notifications. Decisions as to which accidents require a full investigation are made by the Principal Environmental Health Officer, based on HSE's *Incident Selection Criteria Guidance*.

6.5.4 As a 'responsible authority' for the purposes of the Licensing Act 2003 and the Gambling Act 2005 the section has a duty to respond to premises licence applications etc. A number of applications will require scrutiny, some of which may require amendments by negotiation.

6.5.5 Liaison with other organisations is essential in order to achieve consistency and effectiveness of the health and safety service. The service is represented on the Devon Health and Safety (Enforcement) Subgroup, which meets bi-monthly. This group includes a representative from the Health and Safety Executive (HSE) and maintains links with other local authority health and safety enforcement officers.

6.6 National Priorities

6.6.1 HSE's LAC 67/2 (rev.13) - *Setting Local Authority Priorities and Targeting Interventions* includes a number of national priorities, including:

- Raising awareness of the work-related stress and mental health campaign 'Working Minds' with businesses.
- Ensuring that pubs, restaurants and cafés check that outdoor electrical equipment such as lights and heaters are specifically designed for outdoor use, installed by a competent person and checked regularly for damage or water ingress.
- Legionella from spa pools and hot tubs in the holiday sector.
- Cooling towers in built-up areas
- Improving the information provision and supervision of users at trampoline parks.
- Gas safety in commercial catering premises.
- Planned preventative maintenance of work equipment.
- Provision of licensable adventure activities without an AALA (Adventure Activities Licensing) licence.
- Duty to manage asbestos – which will continue to be discussed (where appropriate) during food hygiene interventions.
- Raising awareness of the need to prevent injury to members of the public from accessing large commercial waste and recycling bins – work which can be carried out as part of our on-going initiative to ensure that commercial waste is being correctly presented.

- Inflatable amusement devices – ensuring adequate ground anchorage, measurement of wind conditions, documentation from a competent inspection body to show compliance with BS EN 14960 and annual inspection by a competent person.

6.6.2 LAC 67/2 (rev.13) also sets out a list of activities/sectors which are suitable for proactive inspection. The current list can be found at Appendix C.

6.7 Monitoring

6.7.1 An annual return is made to the HSE's Local Authority Unit at the end of each financial year. This LAE1 return reports upon the number of proactive inspections, face-to-face contacts, non-inspection interventions and reactive visits carried out over the past year. Highlights of the 2023/24 return can be found at 4.2.1

6.8 Enforcement

6.8.1 Enforcement (or the fear of enforcement) is an important motivator for rogue employers. Evidence confirms that enforcement is an effective means of securing compliance and promoting self-compliance.

6.8.2 We will work in partnership with the HSE, other enforcement agencies, regulators and stakeholders to secure proportionate compliance with the law and to ensure that those who have duties under it may be held to account for failures to safeguard health and safety and welfare.

6.8.3 The scope of these activities will continue to be evidence-based and are clearly set out in the Council's Enforcement Policy.

6.9 Staff Resources

The national local authority enforcement code requires the Council to have sufficient capacity to undertake our statutory duties. Exeter City Council.

6.9.1 All Environmental Health Officers will undertake some health and safety duties along with their other functions that include food safety, training, health initiatives, some licensing duties and infectious disease control.

6.9.2 The staff resources allocated to the functions is currently deemed adequate to fulfil the Council's duties. Officers will vary their approach to the health and safety intervention programme to enable them to meet Performance Indicators by targeting resources on high-risk premises and national priorities.

6.10 Staff Skills

6.10.1 Only trained and competent staff will be able to undertake full health and safety duties. The authorisation, and hence action they can take, for each officer will reflect their individual skills. As part of the annual Growth and Development Review all staff who undertake health and safety duties are subject to an assessment of competency. Any training and development needs identified at the Growth and Development Review process are added to the service wide training plan that provides for the priority resourcing of both qualification-based training and continuing professional development.

6.11 Consultation with Stakeholders

- 6.11.1 The Health and Safety at Work etc. Act 1974 places general duties on all employers to protect the health and safety of their employees and those affected by their work activities. Its goal-setting approach makes clear that those who create risks are best able to manage them. We will make clear that effective health and safety management is a collective responsibility in which individuals too must play their part.
- 6.11.2 Experience shows that many organisations do not contact us. Some may be fearful of contact, which deters them from seeking advice. We will make a special effort to explore new ways to establish and maintain an effective health and safety culture, so that all employers take their responsibilities seriously, the workforce is fully involved and risks are properly managed.
- 6.11.3 We will aim to demonstrate the moral, business and economic case for health and safety. Appropriate health and safety management is an integral part of effective business management and, we will promote it as an enabler and not a hindrance.
- 6.11.4 We will explore ways to promote greater access to authoritative health and safety advice and guidance and we will continue to offer advice in the course of our other enforcement activities where appropriate. We will listen to business's health and safety concerns and assist (by the provision of appropriate guidance, advice, training etc.) as much as is practicable.

7 Sampling Programme

7.1 Purpose of Sampling

- 7.1.1 The food and water quality sampling programme is devised to ensure effective use of resources and fulfil the requirements of the Food Sampling Policy, Private Water Supply Regulations and water quality standards in respect to swimming pools.

7.2 Requirement to Sample

- 7.2.1 The sampling programme operates on a total sampling allocation of 10 samples per 10,000 population. This will require approximately 130 samples per year to be taken. The authority is required to provide a statistical return to the Food Standards Agency (FSA) and Drinking Water Inspectorate on its annual sampling activity. All local authorities have an arrangement with the UK Health Security Agency Laboratory, which provides a credit allocation to facilitate this work.
- 7.2.2 The authority has a duty under the Private Water Supply Regulations to conduct periodic sampling of Private Water supplies within the City. All local authorities within Devon have an arrangement with South West Water, which provides a pay as you sample contract to facilitate this work.
- 7.2.3 The authority also conducts routine swimming pool sampling of all public and private swimming baths within the city. All local authorities have an arrangement with the UK Health Security Agency Laboratory, which provides a credit allocation to facilitate this work.

7.3 Sampling Methodology

- 7.3.1 Primary Authority Partnership role: There is a limited role for the Council to play in this respect as we are without any large national companies producing high-risk products with whom we have a primary authority partnership agreement. There are, however, a

few small producers whose products are distributed locally and sampling will provide a means of surveillance of their goods and services. By carrying out sampling over a period of time, we were able to help one of our smaller primary authority partners to determine a suitable shelf life for a newly developed range of food products prior to them going into production.

- 7.3.2 South West Food Liaison Group: The group liaises with UKHSA to help inform the contents of a number national/regional sampling plans each year. Members choose from a list of potential sampling initiatives based on their understanding of those foods/practices likely to be of highest risk/greatest concern. In 2023, unsatisfactory samples of bagged salads taken from Exeter retailers helped the manufacturers of these products (none of whom were in Exeter) to identify and rectify hygiene issues at their place of production.
- 7.3.3 Vulnerable Foodstuffs: High-risk foodstuffs, which give cause for concern or suspicion, may need to be sampled on an ad hoc basis. This will include sampling as a means of verifying controls at a critical step in a food operation and monitoring of imported food for example.
- 7.3.4 Complaints: Food samples may be taken when investigating consumer complaints, either to confirm suspected contamination or in undertaking enquiries resulting from complaints.
- 7.3.5 Statutory Samples: We have a statutory obligation to monitor water distributed by SWWS Ltd and to a limited extent premises with private water supplies.
- 7.3.6 Survey Work: The number of samples taken as a result of Food Alerts, locally/nationally agreed surveys and food poisoning investigations is subject to annual variation, but provision will be made for these items.
- 7.3.7 Environmental Swabs: The swabbing of key food contact and hand contact surfaces is seen as an effective means of contributing to the assessment of hygiene standards during routine food hygiene inspections. Officers will use a combination of swabs sent to the UK Health Security Agency laboratory and ones analysed at the time of visit using an ATP meter (a hand-held device which can produce a numerical representation of the cleanliness of a swabbed surface)

7.4 Budget Provision

- 7.4.1 In addition to the credit allocation provided by the UK Health Security Agency laboratory, sums of £260 (analyst’s fees) and £300 (samples) are included within the budget. These sums are intended to cover all sampling and a proportion of this will be reserved for Health and Safety sampling (e.g. asbestos, COSHH etc.).

7.5 Resources

- 7.5.1 There is adequate provision within the present budget to undertake the proposed sampling programme. Allowing for some flexibility between the two budget entries ensures that problems in financing the purchase and analysis of samples for the Food and Health and Safety enforcement functions of the section will be minimised. The programme assumes the current staffing level as outlined in section 5 of this report will be maintained throughout the year.

Year	2024										2025		
Months of sampling	A	M	J	J	A	S	O	N	D	J	F	M	
UK Health Security Agency Studies													

Study 80 – unpasteurised and pasteurised milk cheese														
Study 81 – Hygiene in tattoo/piercing premises														
Exeter Specific Sampling Programme														
Swimming Pool Sampling														
Private Water Supply Sampling														

8 Environmental Health Training Service

8.1 Scope of the Training Service

8.1.1 The service has established a robust cost-effective training service for Exeter and the surrounding area.

8.2 Main Provisions of the Training Service

8.2.1 Food handlers must receive adequate supervision, instruction and /or training in food hygiene for the work they do. The owner of the food business is responsible for ensuring that this happens. There is an equivalent legal position under Health and Safety legislation and businesses have a legal duty to assess the risks within their operation and the take precautions to minimise that risk.

8.2.2 The Environmental Health training services provision has been at the forefront of training since the establishment of the first formal courses. Over the years, the Environmental Health Training Portfolio has established itself as a primary provider of Environmental Health training courses in Exeter and the surrounding area. The authority aims to provide this service on a cost neutral or profit-making basis.

8.2.3 The training and education activities are principally directed to workplace and consumer health protection, although increasingly educational establishments and the voluntary sector are using the service. The service embraces the principles of excellence in public services and Better Regulation and looks to make the most effective use of available resources to achieve maximum gain.

8.2.4 Exeter City Council is a registered Royal Society of Public Health training centre, offering face-to-face taught RSPH Level 2 food hygiene courses. Courses are run at The Matford Centre approximately six times per year; additional off-site training can be provided where organisations are able provide appropriate facilities and a sufficient number of delegates.

8.3 Access to Training

8.3.1 The service looks to actively encourage delegates who require additional support in terms of, language difficulties, poor literacy or numeracy skills, physical or mental challenges, dyslexia or other literacy problems.

8.3.2 Where additional support is required, this can be provided through the provision of language specific course materials, extension of guided learning hours, oral examinations, extended examination period, alterations to the method of instruction or

provision of specific courses. The service also provides training in other languages to meet the diverse needs of the business community.

8.3.3 E-learning courses, which allow candidates to study at their own pace, are offered as an alternative to those unable to attend taught courses. Our e-learning Level 3 course is popular as an equivalent taught course would require 3 or 4 days in a classroom environment.

8.4 Financial Implications

8.4.1 The costs of providing training in other languages significantly increases the costs as the service needs to employ the services of a translator or course tutor who can deliver the course in the desired language to ensure that the courses are equally successful.

8.4.2 Six face-to-face level 2 food hygiene courses took place in 2023/24; a total of 77 delegates attended. Gross takings for face-to-face courses was £4775; profit (once the costs of room hire, exam papers and course books were removed) was £3399.

8.4.3 Twenty-three e-learning level 2 and nine e-learning level 3 courses were sold; gross takings for e-learning courses was £1585.

9 Resources

9.1 Financial Matters

9.1.1 Detailed figures to determine the overall specific level of expenditure involved in providing individual elements of the service are not available as there are fluctuations in priority and need across the wide range of legislative areas. Likewise with changes in the intervention pattern it is difficult to accurately determine the trend of growth, of the various functions of the service. The food safety function can occupy the significant portion of time of the Section, at the expense of the other services.

9.1.2 The training element is also covers subjects across the enforcement disciplines, although it has its own budget and cost centre and aims to be cost neutral. External tutors are used to increase efficiency in delivering this service.

9.1.3 The budgets for sampling and analysis of samples are currently £560 for the year.

9.2 Budget Allocation Figures for 2024/25 – Food Safety Function

	Salary (+)	Equipment	Travel
<u>Commercial F020</u>	338,040	9,770	810
Proportion allocated to Food Safety Function (40%)			
Analysis (max)	135,216	3,908	324
Purchase of Samples		260	
		300	
Environmental Protection Sampling Technician	2,371		

NB: Based on 40% allocation to Food Safety. Analyst fees up to a maximum £260 (may also be used for water/health and safety samples) if required.

9.3 Budget Allocation Figures for 2024/25 – Health and Safety Function

	Salary (+)	Equipment	Travel
<u>Commercial F020</u>	338,040	9,770	810
Proportion allocated to Health & Safety Function (40%)	135,216	3,908	324

NB: Based on 40% allocation to Health and Safety. Analyst fees up to a maximum £260 (may also be used for water/health and safety samples) if required.

9.4 17.1.6 Budget Allocation Figures for 2024/25 – Training Provision

	Salary (+)	Equipment	Travel
<u>Health Education F018</u>	440	16,140	-
Proportion allocated to Health & Safety function (20%)	220	3,228	-
Proportion allocated to Food Safety function (80%)	220	12,912	-

9.5 Staffing Allocation

9.5.1 The Environment and Waste Service is managed by the Head of Environment and Waste.

Title	Qualification	Role
Head of Environment and Waste	BSc / Msc Environmental Health	Head of Service

There are currently 3 FTE staff directly working on food, enforcement and related matters and 2 FTE staff directly working on health and safety related matters with a significant and increasing support role by an Environmental Technical Officer and Project and Support staff. An Apprentice EHO post was created in 2023, studying for a BSc in Environmental Health at University Centre Weston, whilst gaining valuable work experience in the Business Regulation Team.

Title	Qualification	Role
Environmental Health and Community Safety Manager	BSc / Msc Environmental Health	Manager
PEHO	BSc Environmental Health	Lead Professional Officer
EHO	BSc Environmental Health	Food Safety / Health and Safety and Nuisance District Officer
EHO	BSc Environmental Health	Food Safety / Health and Safety and Nuisance District Officer

Title	Qualification	Role
EHO	BSc Environmental Health	Food Safety / Health and Safety and Nuisance District Officer
Apprentice EHO	Working towards BSc Environmental Health	Practical experience in the Business Regulation Team whilst studying for BSc.
Environmental Health Technician	Educated to degree level	Sampling and Monitoring

9.5.2 There are currently 3 FTE staff providing a project and support service for The Environmental Health and Community Safety service.

Title	Qualification	Role
Principal Projects and Support Officer	Educated to A level standard	Service Support
Projects and Support Officer	Educated to A level standard	Service Support
Projects and Support Officer	Educated to A level standard	Service Support

9.5.3 It is currently the approach of the Council to engage the services of outside contractors to assist in programmed food hygiene interventions where necessary. This will be subject to any agency contractors meeting the requirements specified in the Code of Practice (England) and the relevant Councils procedure and the cost of the work being met within existing budgets.

9.6 Self-Development Plan

The service will ensure that staff are appropriately qualified and receive regular training to maintain and improve their level of competency. All officers will have access to training that allows them to fulfil the twenty hours continuing professional development (CPD) requirement set out in the Food Law Code of Practice. Ten of these hours will be food-related, the other ten may relate to professional matters such as evidence gathering, legal proceedings etc. Membership of the Chartered Institute of Environmental Health also requires evidence of this number of hours of CPD per year (30 hours for chartered members).

9.6.1 The training structure comprises:

- the employment of enforcement officers capable of food law, health and safety, licensing, environmental permitting and other enforcement that they are required to undertake;
- evidence of formal qualification (sight of original qualification certificates prior to commencement of employment);
- in-house competency-based training;
- successful completion of competence-based needs assessments and
- identification of training needs during annual performance appraisal to meet current targets to assist and improve upon performance against current job requirements.

9.6.2 The following additional steps are taken to ensure staff development:

- internal training sessions will be held (anticipated 4 hours CPD in food related topics and 4 hours CPD in health and safety related topics per year);

- briefing notes on topics of current interest will continue to be regularly circulated to bring details of new legislation and technological change in the field of all enforcement areas to the attention of officers and
- programmes of instruction will be devised to accommodate the needs of new and existing staff and ensure the required level of competency.

10 Quality Assessment

- 10.1.1 The Environmental Health and Community Safety Manager and Principal Environmental Health Officer monitor the quality and consistency of work through the checking of inspection correspondence, statutory notices and audits of various aspects of work conducted on a periodic basis.
- 10.1.2 Any formal complaints made against the service are investigated and monitored in accordance with Council's Complaint Policy.
- 10.1.3 External verification of quality is actively pursued with a commitment to promote consistency of enforcement through auditing and benchmarking with the Devon Health and Safety and Food Safety groups as well the Health Protection Advisory Group organised by UK Health Security Agency.
- 10.1.4 Internal monitoring procedures have been set up to verify the service operates in conformance with relevant legislation, the Food Law Codes of Practice (England), Section 18 of the Health and Safety at Work etc. Act 1974 and our procedures.
- 10.1.5 The Council will continue to monitor and report on Customer Satisfaction with interventions and enforcement conducted by the service.
- 10.1.6 The Principal Environmental Health Officer undertakes annual quality monitoring audit with each inspecting officer to ensure consistency of enforcement. These audits are recorded and any outcomes agreed between the Principal Environmental Health Officer and inspecting officer.
- 10.1.7 Consistency matters are discussed regularly at weekly team meetings; additionally, the Principal Environmental Health Officer undertakes case review meetings with a district officer every week.

11 Review

- 11.1.1 Quarterly Performance Indicators on progress in implementing this Service Plan will be made by the Head of Environment and Waste to the Strategic Director.
- 11.1.2 An annual review against the Service Plan will be made by the Executive Committee.
- 11.1.3 The annual review report will contain information on performance against the Service Plan and Performance Indicators. It will highlight any variances from the plan, reasons for these, and the likely impact that these may have.
- 11.1.4 The Executive will support and Council will approve the Service Action Plan for the year. Improvements to the service identified as a result of the review, quality assessment, or benchmarking work will be incorporated in the Plan.
- 11.1.5 Information on our targets and progress towards meeting these will be published and publicised as part of the Council's Performance Plan.

11.2 Targets

11.2.1 Service Performance Indicators for 2024/2025:

- Percentage of food premises broadly compliant with food hygiene law (annual figure provided to FSA and APSE as part of annual return)
- Number of food safety Interventions (six-monthly figure provided to FSA and to APSE as part of annual return)
- Number of health and safety Interventions (annual figure provided to HSE and APSE as part of annual return)
- Percentage of samples taken found to be satisfactory
- Number of delegates engaging with health education initiatives (can be provided quarterly or on an annual basis)
- Percentage staff absence (annual figure provided to APSE as part of annual return)
- Net cost of food hygiene service per head of the population (annual figure provided to APSE as part of annual return)
- Net cost of Health and Safety service per head of the population (annual figure provided to APSE as part of annual return)

11.3 Review of performance

11.3.1 Performance will be monitored by the Head of Environment and Waste and where there are significant issues, reports will be made to the Strategic Director.

12 Conclusion

12.1.1 This service plan demonstrates that the Council has organised its food safety and health and safety and other associated functions in such a manner that it is capable of achieving a comprehensive service capable of meeting the corporate aims of the authority, and the expectations of the Food Standards Agency, Health and Safety Executive, Drinking Water Inspectorate and other related legislation that the section has responsibility for enforcing.

13 Glossary of terms

GLOSSARY	
CCG	Clinical Commissioning Group
CIEH	Chartered Institute of Environmental Health
DEFRA	Department for Environment, Food and Rural Affairs
EHO	Environmental Health Officer
EHORB	Environmental Health Officers Registration Board
EHT	Environmental Health Technician
FSA	Food Standards Agency
HACCP	Hazard Analysis and Critical Control Points
HECA	Home Energy Conservation Act
HoS	Head of Service
LGR	Local Government Regulation
MHCLG	Ministry of Housing, Communities and Local Government
PEHO	Principal Environmental Health Officer
PHE	UK Health Security Agency (formally Public Health England)
PCT	Primary Care Trust
RIAMS	Regulatory Information and Management Systems
RSPH	Royal Society of Public Health

14 Action Plan 2024-25

14.1.1 Maintain high standards in food safety by:

- Following the FSA's post Recovery Plan guidance by applying a risk-based and intelligence led approach to the prioritisation of food interventions. Interventions for higher risk businesses or those that are likely to be high-risk will always take priority over interventions for lower risk businesses.
- Continuing to maintain high level (>97%) of broadly complaint food businesses in the city.
- Enhanced coaching/sampling/training for non-complaint businesses, with caution/prosecution as final action for those who continually flout the law.
- Continuing with an intelligence-led food sampling programme
- Building our customer base for taught Level 2 food hygiene courses whilst promoting e-learning to those who prefer to learn that way.
- Recognising food business trends such as the growth of home/mobile catering and internet sales and offering hygiene guidance and advice in an appropriately accessible format.

14.1.2 Promote safer workplaces by

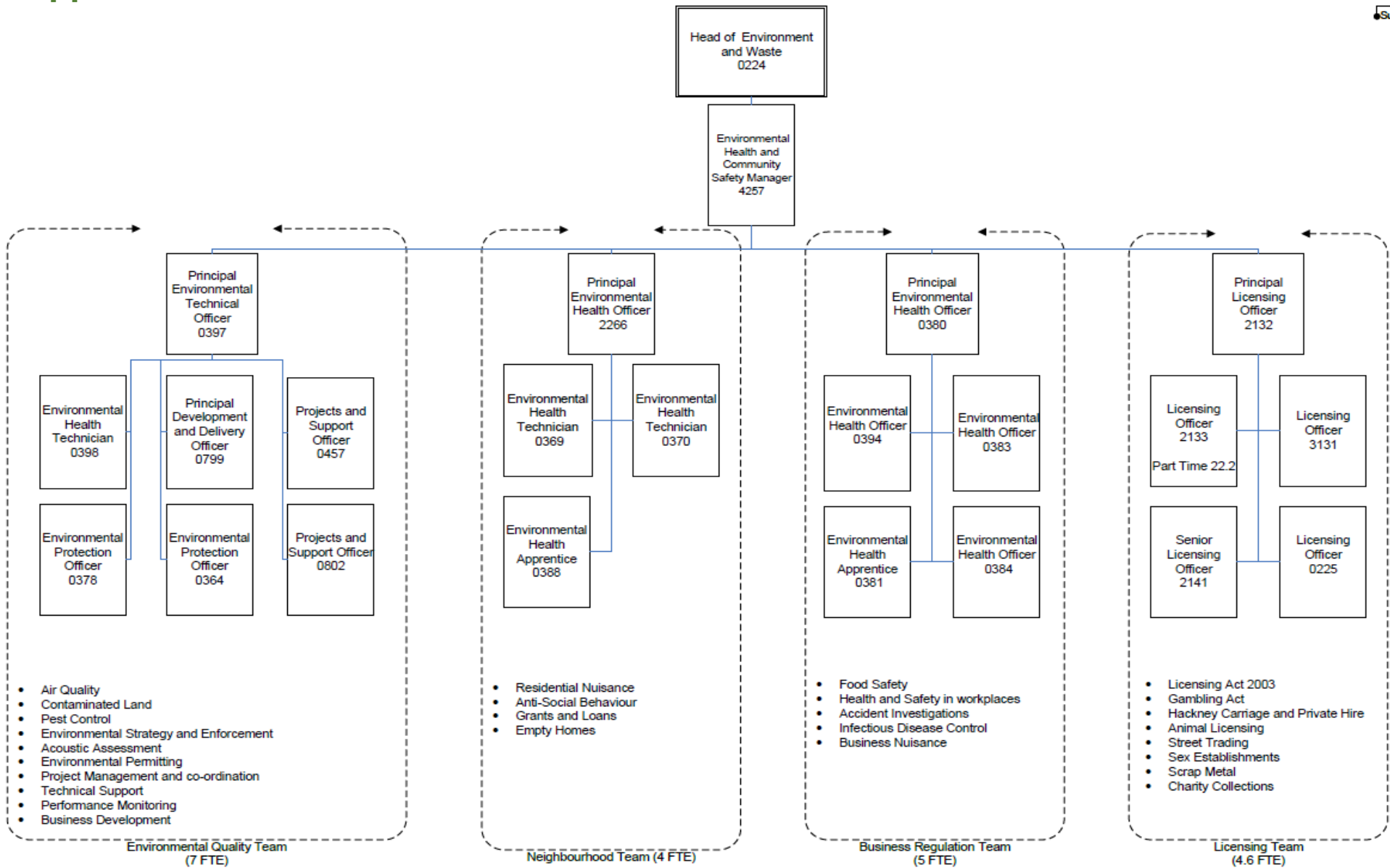
- Focussing on the duty to manage asbestos, commercial gas safety and outdoor electrical safety during routine food hygiene inspections whenever appropriate.
- Continuing to conduct water quality sampling of swimming pools and private water supplies.

14.1.3 Co-ordinate multi-agency visits where migrant worker/modern slavery issues are suspected or identified.

14.1.4 Review and refresh the means of business engagement and training using innovative means to help business grow and thrive.

14.1.5 To investigate further Primary Authority Partnership opportunities for the service.

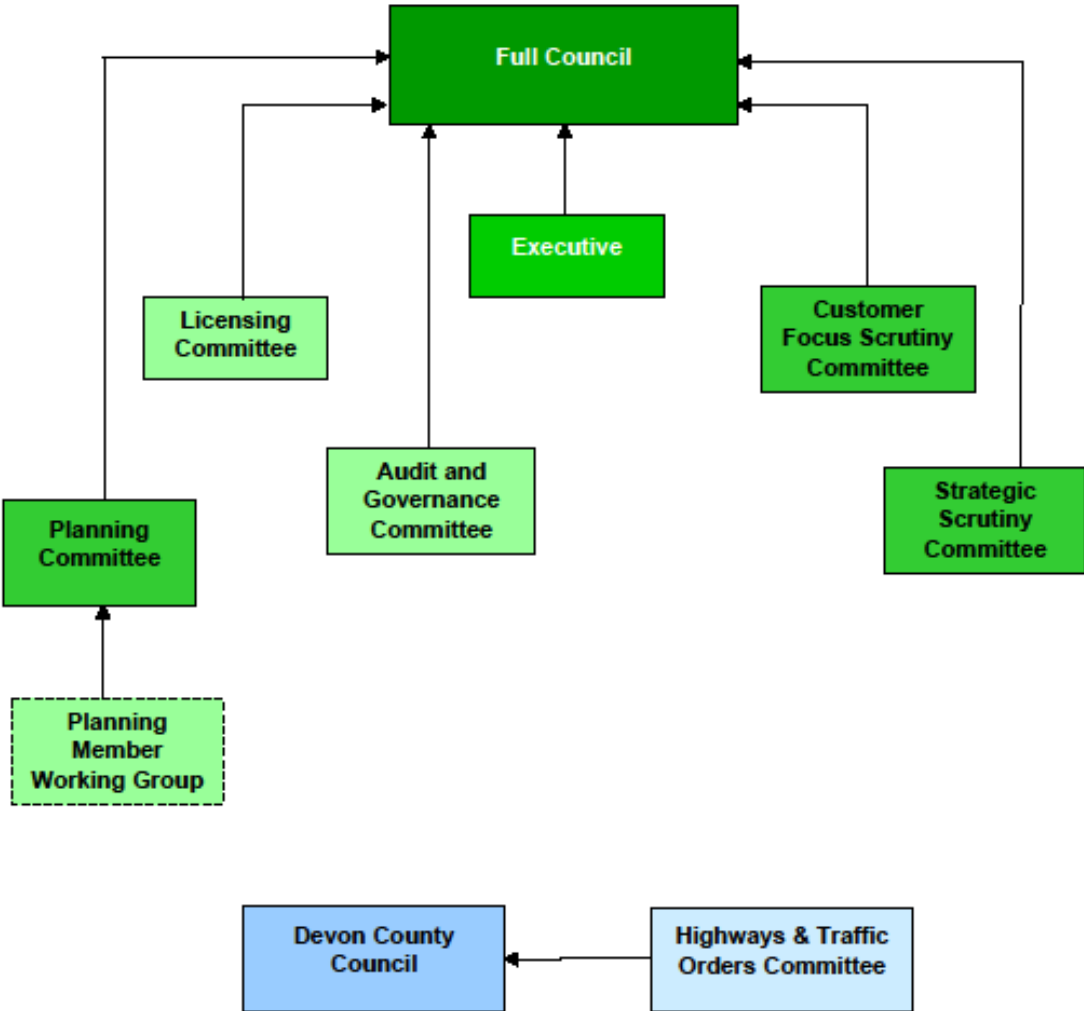
Appendix A – Service Structure



Appendix B – Committee Structure



The Council's Committee Structure



Appendix C – List of activities / sectors for proactive health and safety inspection by Local Authorities

Topic	Hazards	Potential Poor Performers within an Industry Sector	High Risk Activities
Health	Lead poisoning	Indoor firing ranges/gun clubs	Ineffective air extraction, poorly managed cleaning procedures, inadequate handwashing facilities.
Health	E.coli/ Cryptosporidium infection esp. in children	Open Farms/Animal Visitor Attractions ¹	Lack of suitable micro-organism control measures
Health	Occupational deafness	Industrial retail/wholesale premises ³	Exposure to excessive noise (eg steel stockholders).
Health	Industrial diseases / occupational lung disease (silicosis)	Industrial retail/wholesale premises ³	Exposure to respirable crystalline silica (Retail outlets cutting/shaping their own stone or high silica content 'manufactured stone' e.g. gravestones or kitchen resin/stone worktops)
Health	Industrial diseases / occupational lung disease (cancer)	Industrial retail/wholesale premises ³	Exposure to all welding fume regardless of type or duration may cause cancer. (e.g. Hot cutting work in steel stockholders) Exposure to be controlled with LEV and or appropriate RPE. ⁴
Health	Occupational lung disease (asthma)	In-store bakeries ⁵ and retail craft bakeries where loose flour is used and inhalation exposure to flour dust is likely to frequently occur i.e. not baking premade products.	Tasks where inhalation exposure to flour dust and/or associated enzymes may occur e.g. tipping ingredients into mixers, bag disposal, weighing and dispensing, mixing, dusting with flour by hand or using a sieve, using flour on dough brakes and roll machines, maintenance activities or workplace cleaning.
Health	Musculoskeletal Disorders (MSDs)	Residential care homes	Lack of effective management of MSD risks arising from moving and handling of persons
Health	Manual Handling	High volume Warehousing/Distribution ²	Lack of effective management of manual handling risks
Health	Carbon monoxide poisoning	Commercial catering premises using solid fuel cooking equipment	Lack of suitable ventilation and/or unsafe appliances
Safety	Explosion caused by leaking LPG	Communal/amenity buildings on caravan/camping parks with buried metal LPG pipework	Caravan/camping parks with poor infrastructure risk control/management of maintenance
Safety	Explosion caused by leaking LPG	Catering establishments.	Unsafe gas appliance installation/maintenance and unsafe use and storage of LPG cylinders and cartridges.
Safety	Violence at work	Premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off-licences/hospitality ⁶) and where intelligence indicates that risks are not being effectively managed	Lack of suitable security measures/procedures. Operating where police/licensing authorities advise there are local factors increasing the risk of violence at work e.g. located in a high crime area, or similar local establishments have been

			recently targeted as part of a criminal campaign
Safety	Fires and explosions caused by the initiation of explosives, including fireworks	Professional Firework Display Operators ⁷	Poorly managed fusing of fireworks
Safety	Fatalities/injuries resulting from being struck by vehicles	High volume Warehousing/Distribution ²	Poorly managed workplace transport
Safety	Fatalities/injuries resulting from falls from height/ amputation and crushing injuries	Industrial retail/wholesale premises ³	Poorly managed workplace transport/ work at height/cutting machinery /lifting equipment
Safety	Falls from height	High volume Warehousing/Distribution ²	Work at height
Safety	Crowd management & injuries/fatalities to the public	Large scale public gatherings e.g. cultural events, sports, festivals & live music	Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave and move around a venue

1 Animal visitor attractions may include situations where it is the animal that visits e.g. animal demonstrations at a nursery.

2 Typically larger warehousing/distribution centres with frequent transport movements/work at height activity.

3 Includes businesses such as: steel stockholders; builder's and timber merchants.

4 Specific guidance available re welding fume on HSE's website at <https://www.hse.gov.uk/welding/protect-your-workers/index.htm> 5 For supermarket and other chain bakeries etc check to see if there is a Primary Authority inspection plan with more specific guidance.

6 Pubs, clubs, nightclubs and similar elements of the night-time economy.

7 Specific guidance on the application of the Explosives Regulations 2014 to the activities of professional firework display operators is available on the HSE website - www.hse.gov.uk/explosives/er2014-professional-firework-display.pdf

Equality Impact Assessment: Food Law and Health and Safety Enforcement Service Plan

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name & date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive Council	Food Law and Health and Safety Service Plan	Adoption of service plan	The Service Plan forms the basis of the business regulation enforcement functions for the authority and ensures that national food safety and health and safety priorities are addressed along with locally identified needs. It demonstrates our commitment to improving public safety and health outcomes, sets out our priorities and planned interventions for the current year and targets them to maximise their impact.

			<p>Exeter City Council has a duty to act as an enforcing authority in premises for which it is responsible. The plan outlines how the Council will undertake that function.</p> <p>It has been produced to ensure that local businesses, landlords, employers and employees, members of the public, council officers and Members understand the approach to regulatory enforcement adopted by the Council. The service plan will help to ensure that the actions of the Council are fair, consistent, open and effective.</p> <p>The Council recognises the important role it plays promoting and securing the safety and health of those who live, work and visit the City. The key aim of this plan is to demonstrate how the Council will fulfil its statutory obligations in accordance with national guidance set out by the respective regulatory agencies. It includes:</p> <ul style="list-style-type: none"> • the Council's aim and objectives; • information about the enforcement services provided by the Council; • details of the Council's performance management systems; • information on performance
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Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<p>Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).</p>	<p>Neutral</p>		<p>There is no evidence that this will impact on any specific person based on this characteristic. Any incidental impact on those within this group is very likely to be positive – for example – promotion of the Food Standard Agency’s guidance for Chinese and Indian cuisines where appropriate.</p> <p>During our routine inspections, we will look for evidence of modern slavery and share this information with partner agencies such as the police. In these situations, unsafe working conditions or inadequate accommodation will be remedied using our enforcement powers as appropriate.</p>
<p>Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.</p>	<p>Positive</p>		<p>The Service Plan applies equally to all residents of Exeter irrespective of disability.</p> <p>Our service does seek to positively support those with disabilities through ensuring safe workplaces.</p> <p>Our food hygiene training courses are available as e-learning, which allow delegates to progress at their own pace and at any location; for our taught courses we offer an oral examination for persons unable to complete a written paper.</p> <p>Food businesses serving predominantly immuno-compromised persons (such as some care homes and hospital kitchens) are inspected at a more frequent interval.</p> <p>Some allergies can be persistent and life threatening; our inspections of food businesses include an assessment of allergen management and communication, with appropriate enforcement where necessary.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			Safer workplaces are of particular importance to people with long-term health conditions – for example, our enforcement of smoke free legislation and the health and safety law pertaining to legionella and asbestos has a positive impact on persons with chronic lung disease.
Sex/Gender	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Gender reassignment	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive		<p>We work with the beauty industry to ensure that persons under the age of 18 do not use sunbeds or acquire a tattoo. We promote, when registering skin piercers, a policy of not piercing those under 16 without a parent/guardian present.</p> <p>Businesses serving food predominantly to vulnerable groups (including those under the age of 5 or over the age of 65) are inspected more frequently (typically annually) than other catering premises.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Pregnancy and maternity including new and breast feeding mothers	Neutral		There is no evidence that this will impact on any specific person based on this characteristic. We offer advice and guidance to employers on the health and safety requirements for new and expectant mothers at work.
Marriage and civil partnership status	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.

Actions identified that will mitigate any negative impacts and/or promote inclusion

The Council will consider Equalities and protected characteristics at all stages of any intervention.

All Authorised Officers will ensure that all persons dealt with receive fair and equitable treatment irrespective of their background or protected characteristics, as defined by the Equality Act 2010.

Officer: Simon Lane, Head of Environment and Waste

Date: 23 August 2024

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REPORT TO EXECUTIVE

Date of Meeting: 1st October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Interim Joint Director - Environment, Waste and Operations

Title: Tree and Woodland Maintenance and Inspections Contract

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 This report outlines the requirements for a new Tree Maintenance and Inspections Contract after the expiry date of the current contract on 1 April 2025.

1.2 The report provides an options appraisal and details the preferred route to market and is compliant with the Councils Contract procedure rules 04 April 2023.

2. Recommendations:

2.1 That Executive approves and recommends that Council:

2.2 Authorises council officers to proceed with the procurement process to appoint a contractor to provide a new tree maintenance and inspection service in accordance with the proposals set out in the report to use an open tender process for the procurement of a single supplier; and

2.3 That authority to confirm the award and appoint a contract following the procurement process be delegated to the Interim Director Community Services in consultation with the Strategic Director for Corporate Resources.

3. Reasons for the recommendation:

3.1 The contract will support the ongoing delivery councils tree management in respect of industry best practice, duty requirements, and the Council's Corporate plan 2022-2026.

4. What are the resource implications including non financial resources

4.1 The contract auditing and management requirements will be undertaken by the Councils Tree Team as business as usual.

4.2 The tree inspection and maintenance contract are fully funded by existing approved revenue budgets. The estimated annual contract cost of the contract will be £266,650 based on those budgets as seen below:

	Cost Centre	Account	Budget
Parks and Green Spaces	F033	31008	115,780.00
Parks and Green Spaces	F033	41029	4,100.00
Housing (HRA Shrubs and Trees)	H060	34050	132,770.00
Housing (HRA Shrubs and Trees)	H060	34052	14,000.00
	Sub-Total		266,650.00
Ash Die Back (Capital)	Z1394	Z1394	100,000.00

4.3 The contract length will be a total of 5 years with two years of possible extension, providing a whole term contract value of £1,866,550.

5. Section 151 Officer comments:

5.1 In line with the Council's Contract Regulations, the report seeks approval to tender for a new contract for tree and woodland maintenance.

6. What are the legal aspects?

6.2 In accordance with the Exeter City Council's Procurement and Contract procedures, the approval of full Council is required at the following stages of a procurement process when the contract value exceeds £1 million:

- 1) Confirmation of business case / Options Appraisal – Authorisation at this stage provides authority to commence with the purchase / procurement process in line with the agreed business case, options appraisal, and route to market.
- 2) Confirmation of Award – Authorisation at this stage provides authority to enter into the contractual agreement with the preferred supplier as a result of the outcomes from the approved purchase / procurement approach.
- 3) Confirmation of Benefits Realisation (above OJEU Level for Services)

At this stage, authorisation is required to commence the procurement process. The report sets out the business case and options appraisal and recommends commencement of the procurement process in compliance with the Public Contracts Regulations 2015.

7. Monitoring Officer's comments:

7.1 Members will note the requirement to comply with the Public Contracts Regulations 2015 and the council's own Procurement and Contract Procedures as set out above.

8. Report details:

Options Appraisal

8.1 Alternative routes to market were considered:

- Option 1. Self-delivery, insourcing a tree team with appropriate skills and equipment.
- Option 2. Using the existing Devon County Procurement Framework
- Option 3. National framework
- Option 4. Using an Open tender for a formal single supplier contract

	Budget (Cost)	Quality	Flexibility	Scope
Self-delivery	✗	✓	✗	✓
Framework	✓	✗	✓	✗
Open Procedure	✓	✓	✓	✓

8.2 Option 1. Self-delivery is not considered to provide value-for-money in comparison to a formal contract. The costs for establishing and maintaining a full-time skilled team, including aerial works, are prohibitive. A provisional estimate of the annual cost for an outsourced team is as follows:

	Forecasted Annual Cost	Budget Detail
Labour	£203,942	<ul style="list-style-type: none"> -Management: the organisation and allocation of work is currently a delegated task taken on by the contractor, to bring this in house additional management capacity would be needed. Costs assumes 0.5 of a Grade H. -Operational team: safety requires a team of three on tree works. 2 must be aerial rescue qualified staff at anticipated grades G, and 3 general arboriculture operatives at expected grade E. Absence cover is required to cover on average 15% staff absence level.
Contractual on duty arrangements	£27,000	Emergency call out provision 365 days per annum. There is the possibility of sub-contracting out at a slightly lower cost.
Equipment and Materials	£12,000	PPE, uniform, safety equipment & inspections, all consumables, and HSE mandated training.
Fleet	£25,000	Fleet supply and maintenance costs, motor fuel, vehicle insurance, plant replacement and specialist equipment hire costs.
Traffic Management	£8,000	Traffic management for highways-based works.
Insurance	£1000	Professional Indemnity
Total	£276,942	

At c.£277k per annum, insourcing costs will exceed that of an external supplier. In addition to the forecasted budget requirement there is likely to be additional hidden annual costs not accounted for at this stage, and an initial capital outlay to procure the plant and equipment required to support an inhouse team.

8.3 Option 2. Devon County framework could achieve a low cost and flexible basic service. However, the framework limits procurement to a cost-only award process. It will not support the Council having direct control over the quality of the Contractor or their work. This will potentially impact the health and wellbeing of the Councils Tree Stock. In addition, the framework did not provide for the full scope of essential maintenance tasks

required. Without quality control or the provision of the full range of work requirement, it is not considered a suitable alternative.

8.4 Option 3. Ad hoc, or casual purchasing arrangements would not be compliant with either set of procurement regulations (2015/2024), and there were no local suppliers on national frameworks. As a result, national framework could not be pursued.

8.5 Because the tree maintenance contract is a significant strategic contract that protects and enhances the councils' trees and woodlands, the Council requires a supplier with diverse capabilities, expertise to provide work to unique specifications, and the ability to support the development of the service applying both current and emerging best practice. Continuing with option 4. a strategic single supplier through open tender will achieve this.

8.6 ECC Ash Die Back action plan, Tree Risk Management strategy, and Tree and woodland strategy require triage assessment of works. As a result of the quantified risk assessment approach, efficiencies are applied throughout the term of the contract as works are only costed, carried out, and invoiced, where necessary to ensure the health and wellbeing of the tree and/or people. These efficiencies alongside contract performance management will ensure best value.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Tree and Woodland maintenance contract supports the Corporate Plan by promoting and enhancing carbon sequestration and negating the effects of air pollution, enhancing the amenity and recreational values of urban areas, and encouraging recreational activity in woodlands.

9.2 It will also meet three of the six pillars of leading a well-run Council, by maintain A balanced budget, providing a value-for-money service, and ensuring well-managed assets.

10. What risks are there and how can they be reduced?

10.1 Procurement of the contract presents the risk of:

- Financial failure of the supplier;
- Contract termination costs;
- Contract and/ or cost variations; and
- Force majeure.

These risks are mitigated through the application of the Council contract procedure rules, due diligence, and Legal Contract processes.

Any Contract Variations will be managed through ECC contract variation procedure in consideration with Legal.

And/ or break and exit strategies will be applied as required as per clause 5 of ECC standard terms and conditions.

10.2 The Operational risks

- Business continuity failure; and

- Quality management failures

These risks will be managed and mitigated through contract performance management.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the strategy recommendations are limited to the delivery of tree management and welfare across the council estate. This bears no relevance to protected characteristics and is a service based on legal duty compliance.

12. Carbon Footprint (Environmental) Implications:

12.1 As highlighted under section 9.1.

13. Are there any other options?

13.1 To ensure the Council complies with all relevant legal requirements, including but not limited to domestic legislation, UK Public Contracts Regulations 2015 ("the Regulations") the options that form the appraisal are the only viable options for this contract.

Interim Joint Director - Environment, Waste and Operations, Cat Chambers

Author: Interim Director Community Services, Cat Chambers

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

Contact for enquires:

Democratic Services (Committees)
Room 4.36
01392 265275

REPORT TO EXECUTIVE

Date of Meeting: 1 October 2024

REPORT TO COUNCIL

Date of Meeting: 15 October 2024

Report of: Director of Place

Title: Honorary Aldermen – Mr Richard Branston

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

This report sets out a proposal to confer the title of Honorary Alderman of the City of Exeter to Mr Richard Branston in recognition of his eminent services to the council as a past member of the council.

2. Recommendations:

2.1 That in accordance with Section 249 of the Local Government Act 1972, the Right Worshipful the Lord Mayor be requested to convene an Extraordinary meeting of the Council, on the rising of the Ordinary meeting of the Council on 15 October 2024, to consider conferring the title of Honorary Alderman of the City of Exeter on Mr Richard Branston.

3. Reasons for the recommendation:

3.1 Section 249 of the Local Government Act 1972 gives Councils the power to grant the position of Honorary Alderman of the City to ‘...persons who have, in the opinion of the council, rendered eminent services to the council as a past [member] of that council’.

3.2 An Extraordinary meeting of the full Council must be convened to specifically consider this matter, with two thirds of those present, voting in favour.

3.3 An Honorary Alderman shall be entitled to the following rights and privileges:

- To enjoy the courtesy title of Alderman and to be so addressed;
- In the event of the Council deciding to give some badge, robe or emblem to Honorary Alderman, to wear such badge, robe or emblem on civic occasions;
- At each meeting of the Council to have seats reserved in the public gallery for the use of Honorary Aldermen;
- To receive a copy of each Council summons;
- To receive invitations to all civic and social events to which Members of the Council are invited;
- To walk in civic procession in a position immediately senior to serving Members and

- To enjoy such other privileges as the Council may confer upon them from time to time.

3.4 If the recommendation contained in this report is accepted by The Executive and subsequently adopted by full Council, an Extraordinary meeting of the Council will be organised immediately after the ordinary meeting of the Council scheduled for 15 October 2024, when Members will be asked to consider conferring the title of Honorary Alderman on Mr Richard Branston.

3.5 The nomination has been received in accordance with the following agreed criteria against which nominations would be considered:-

A person shall be deemed eligible to be enrolled as an Honorary Alderman provided that the person:

- Is not a serving member of Exeter City Council;
- Has served as a Member of the City Council for at least 12 years in total; and
- Has given exceptional service during that period

4. What are the resource implications including non financial resources?

4.1 Other than a small cost in preparing a suitable ceremonial scroll and hosting a small reception, there are no resource implications. These costs can be accommodated within existing budgets.

5. Section 151 Officer comments:

5.1 There are no additional financial implications contained in this report.

6. What are the legal aspects?

6.1 Section 249 of the Local Government Act 1972 provides councils with the power to grant Honorary Alderman status. Section 249 of the Act states that a Council is able to confer the title of honorary alderman ‘...on persons who have, in the opinion of the council, rendered eminent service to the council as past members of that council’. In order to confer the title of honorary alderman, ‘...a resolution passed by not less than two-thirds of the members voting thereon at a meeting of the council specially convened for the purpose to any individual...’ is required.

7. Monitoring Officer’s comments:

7.1 Members will note the legal requirements that need to be satisfied in order to confer the title of honorary alderman. In order to confer the title, Members must be satisfied that, in their opinion, the individual has ‘rendered eminent services to the council’ as a past member of the council.

8. Report details:

8.1 The Council is asked to consider conferring the honour to Mr Richard Branston for the reasons as shown in paragraph 3.5 above.

8.2 Mr Branston terms of office amount to 24 years consecutively and was Cllr for St Leonards Ward, and therefore meet the necessary length of service criteria. He was also Chair of Licensing Committee in 2007-2008

9. How does the decision contribute to the Council's Corporate Plan?

9.1 This decision will help promote the city as a regional capital and one which supports those who support and promote the city as such.

10. What risks are there and how can they be reduced?

10.1 There are no risks associated with the proposals.

11. Equality Act 2010 (The Act)

11.1 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because there are no risks associated with the proposals.

12. Carbon Footprint (Environmental) Implications:

12.1 No direct carbon/environmental impacts arising from the recommendations.

13. Are there any other options?

13.1 The Council could decide not to make the award, although it is felt that this would be against the principles of the approved criteria.

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Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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