



Exeter City Council

A meeting of **EXETER CITY COUNCIL** will be held at the **GUILDHALL, HIGH STREET, EXETER** on **TUESDAY 22 JULY 2025**, at 6.00 pm, at which you are hereby summoned to attend.

If you have an enquiry regarding any items on this agenda, please contact Liz Smith, Democratic Services Officer on 01392 265425 or email democratic.services@exeter.gov.uk.

The following business is proposed to be transacted:

- 1 Minutes
To approve and sign the minutes of the meeting held on 10 June 2025. Pages 5 - 22
 - 2 Official Communications
 - 3 Public Questions
Details of questions should be notified to the Democratic Services at least three working days prior to the meeting - by 10am on Thursday 17 July 2025 via email: democratic.services@exeter.gov.uk Details about speaking at Council can be found here [Public Speaking at Meetings](#).
- To receive minutes of the following Committees and to determine thereon:
- 4 Exeter Harbour Board - 12 June 2025 Pages 23 - 38
 - 5 Strategic Scrutiny Committee - 5 June 2025 Pages 39 - 46
 - 6 Executive Committee - Special 19 June 2025 & Special 24 June 2025 and 8 July 2025 Pages 47 - 88
 - 7 Corporate Plan Report
To consider the report of the Strategic Director for People and Communities. Pages 89 - 136
 - 8 Organisational transformation and Efficiency Projects - Request for a non-recurring budget

To consider the report of the Chief Executive.

Pages
137 - 144

9 Joint Habitats Site Mitigation Strategy

To consider the report of the Strategic Director for Place.

Pages
145 - 230

Notice of Motion

- a) Notice of Motion by Councillor Hughes under Standing Order No. 6

Motion: Supreme Court Motion

Council notes that:

The Supreme Court, in the case of *For Women Scotland v the Scottish Ministers*, ruled that the terms “man”, “woman” and “sex” in the Equality Act 2010 refer to ‘biological sex’, and that the Scottish Government’s effort to increase women’s representation on public boards therefore did not entail representation by trans women with a Gender Recognition Certificate, as it had intended.

A Gender Recognition Certificate (GRC) allows trans people to change their birth certificate and their sex marker with HMRC. It is an illegal practice under the Gender Recognition Act 2004 for an employer to ask for an employee’s GRC.

Repeatedly misgendering someone, particularly a transgender person, could be considered a form of harassment and direct discrimination under the Equality Act 2010, although the law is still evolving around this and is currently still complex.

Interim guidance published by the Equality and Human Rights Commission (EHRC) has suggested that trans women should not be permitted to use women’s facilities, and trans men should not be permitted to use men’s facilities, in workplaces and services open to the public. This interim guidance is currently in the process of being challenged by way of a claim for judicial review by the Good Law Project. If the claimants are found to be incorrect, then the submission is that the EHRC interim guidance is incompatible with articles 8 and/or 14 of the European Convention of Human Rights.

The Supreme Court judgement, and following interim guidance from the EHRC, has caused great anxiety, uncertainty, and fear for the trans, non-binary, and intersex communities. It has also encouraged open bigotry, and a further removal of safety measures for trans and non-binary people in workplaces and public spaces due to a lack of understanding of what this Supreme Court judgment actually means.

The law requiring respect for trans/non-binary rights has not changed. The provisions of the Equality Act 2010 on protected characteristics, associated case law, plus the Supreme Court has reaffirmed that trans people’s rights must be respected under the law.

A recent Galop survey found that two-thirds of LGBT+ respondents had experienced anti-LGBT+ violence or abuse, and abuse is particularly severe for trans people.

The LGBT+ community are more likely to experience disproportionately poor health outcomes, workplace conflict, homelessness, and difficulties accessing public services. This includes the LGBT+ community in our city of Exeter.

Council believes:

- Trans women are women, trans men are men, and non-binary and intersex people exist and deserve recognition.
- Everyone should be safe and free to be themselves, without fear of hostility or violence, and the erosion of trans rights threatens everyone's rights – especially women and girls.
- Nobody's life chances should be limited or determined because of their sexual orientation or gender identity or gender expression.
- The trans community deserve clarity and reassurance on how their rights will be protected.
- Parliament must act to clarify how Gender Recognition Certificates interact with the Equality Act 2010, ensuring that Gender Recognition Certificates recognise trans people's gender identities for all purposes under the law.

Council resolves to:

1. Affirm our support for trans, non-binary, and gender-diverse residents and our commitment to defending their rights and dignity.
2. Instruct the Chief Executive / Leader of the Council to write to the Minister for Women and Equalities to make clear the position of this council and to ask the following:
 - a. how existing legislation will protect the rights of trans, non-binary, and intersex people.
 - b. What new legislation is envisaged?
3. Not alter guidance for staff or the provision of services in light of the Supreme Court judgement whilst the EHRC guidance is interim and under consultation.
4. Not make any changes to current provision without first seeking legal advice, including checking in with the progress of The Good Law Project judicial review.
5. Commit to providing gender-neutral bathrooms and changing room facilities, such as those at ECC owned and designed St Sidwell's Point, separate to and including similar facilities for disabled people.
6. Commit to ensuring that Exeter is welcoming and inclusive to the LGBT+ community, embracing difference and ensuring action to ensure the safety of all residents.

11 Notice of Motion by Councillor K Mitchell under Standing Order No.6

Notice of Motion - Student Council Tax Gap

"Council notes that:

- The Student Class N Council Tax exemption is a national policy that helps to support the accommodation costs of full-time students during their studies.

- It receives some reimbursement from the DCLG via the Settlement Funding Assessment to compensate for the loss of Council Tax income, but that the student adjustment was fixed in 2013/14 and has not been updated since.
- With the rise in Council Tax rates since 2013/14 and growing student numbers, the current cost of N exemptions within Exeter is estimated to be £10.12m of which £0.8m would be payable to Exeter City Council.
- In response to a recent parliamentary question, HMG has indicated that they intend to use the consultation on the Fair Funding Review 2.0 to review the adjustments to the funding formula for local authorities with higher student- exempt properties.

Council believes that:

- The review of the funding formula is a welcome first step, but that local authorities with high student populations, like Exeter, should not disproportionately bear the costs of student Council Tax exemptions.

Council resolves to:

- Participate fully in the consultation process on the Fair Funding Review 2.0, making the case for the funding gap caused by Class N exemptions to be filled and that future funding assessments should reflect changes in Council Tax rates and student numbers.
- Engage with similar authorities and others, locally and nationally, to jointly lobby HMG on this issue.”

Proposer – Cllr Kevin Mitchell
 Seconder – Cllr Tammy Palmer

12 Questions from Members of the Council under Standing Order No. 8

To receive questions from Members on any matter for which the Council has powers, duties or affects the city.

A plan of seating in the Guildhall is attached.

Date: Monday 14 July 2025

Bindu Arjoon
 Chief Executive

COUNCIL

Tuesday 10 June 2025

Present:

The Right Worshipful the Lord Mayor, Councillor Anne Jobson
Deputy Lord Mayor, Councillor Gemma Rolstone

Councillors Asvachin, Banyard, Begley, Bialyk, Cookson, Darling, Fullam, Haigh, Harding, Holland, Hughes, Hussain, Ketchin, Knott, Miller-Boam, Mitchell, K, Mitchell, M, Moore, Palmer, Parkhouse, Patrick, Payne, Pole, Read, Rees, Rolstone, Sheridan, Snow, Vizard, Wardle, Wetenhall, Williams, M, Williams, R, Wood and Wright.

Also Present:

Chief Executive, Strategic Director for Corporate Resources, Head of Legal and Democratic Services & Monitoring Officer, Strategic Director for Place, Democratic Services Manager and Democratic Services Officer(LS)

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MINUTES

The minutes of the Ordinary meeting of the Council held on 15 April 2025 were moved by the Lord Mayor, taken as read, approved and signed as correct.

The minutes of the Annual meeting of the Council held 13 May 2025 were moved by the Lord Mayor, taken as read, approved and signed as correct.

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OFFICIAL COMMUNICATIONS

The Lord Mayor advised that she had attended 12 events since being elected as Lord Mayor including:

- Exeter College's under-18s women's rugby training session;
- Ukrainian Vyshyvanka Day;
- Hong Kongers Dragon Boat Festival;
- The openings of both the LHC office, and the McDonalds in Digby;
- Exeter Comedy Festival;
- Devon County Show;
- Respect Festival;
- Women's Rugby World Cup Trophy;
- Bow Lines Maritime Literary Festival; and
- Choral Evensong at the Cathedral following the introduction of the new Bishop of Crediton designate.

The Deputy Lord Mayor advised that she had attended two events since being elected.

The Lord Mayor also reminded Members of Armed Forces Day on 20th June, and the Freedom of the City parade by the Royal Marines of Lympstone Marine Camp, and that she hoped to see many Members there.

PUBLIC QUESTIONS

The Lord Mayor reported the receipt of nine questions from members of the public and advised that supplementary questions should be short and directly related. Any questions that cannot be addressed during this Item will be answered in the minutes.

Question from James Diamond to Councillor Wood

“The December ECC motion called on DCC to increase the number of School Street what contribution could this make to the delivery of the 2040 Vision ‘By the time they are an adult, a child born in Exeter today will live in a city that is inclusive, healthy and sustainable?’”

Response from Councillor Wood

“School Streets have the potential to increase the amount of walking and cycling achieved by children, young people and families. This would support improved physical and mental wellbeing and enable children and young people to be healthy and active through daily walking and cycling. Children who walk and cycle to school will be more likely to continue with sustainable travel behaviour as they get older, therefore contributing to the 2040 vision and the council net zero ambitions.”

In a supplementary question the member of the public asked the Portfolio Holder if he would commit to meet the new Leader of Devon County Council (DCC) and the new Portfolio Holder for transport to make most of the motion. The Portfolio Holder deferred to the Leader as there was more than one relevant Portfolio, and the Leader advised that there had been meetings scheduled at respective levels.

Question from Harriet Sharp to Councillor Vizzard

“In December 2024, ECC passed a motion calling on DCC to increase the number of School Streets in Exeter and to provide a progress report on this activity to the ECC Transport Member Working Group in six months’ time. Can you please provide a copy of this six-monthly report?”

Response from Councillor Vizzard

“Officers from the Council’s Live and Move team are engaged with Devon County Council sustainable transport team regarding active travel and school streets in particular. DCC maintains an active school streets application process that is open to all schools and we are aware that DCC have recently commissioned a project to support a number of Exeter Schools with Travel Plan measures. A progress report will be taken to the next Exeter Transport member Working Group on 18 September 2025”

In a supplementary question the member of the public asked if there had been any meetings between DCC officers and ECC officers since the motion. Councillor Vizzard advised he was not aware and asked officers to report back.

Question from Mark Hackett to Councillor Bialyk, Leader

“When the Council Tax officer ignores emails sent to the correct address about problems with the council tax what can a citizen do when ignored at Exeter City Council level?”

Response to Councillor Bialyk, Leader

“Citizens can refer to the Council’s corporate complaints policy and can make a formal complaint if they think we have:

- not resolved an issue or problem at the first point of contact;
- done something wrong;

- behaved unfairly or impolitely;
- not carried out a service to an agreed standard or in line with our policy; and
- not responded to your request for a service within our stated timescale.

Our complaints process is for an on-going service failure that you believe is our fault.”

In a supplementary question the member of the public asked if the URL for the form would be available in the minutes and was advised by the Leader that he would talk to Directors and he should await direct contact.

Question from Colleen Natola to Councillor Wood

“I have bowel disease and spinal injuries. Health professionals tell me to swim. I can’t wait at a bus stop, walk to SSP or afford to pay to park. My e-bike was recently stolen from SSP. Please explain, how can I live better, follow doctor’s advice once Northbrook is closed?”

Response from Councillor Wood

“The Council acknowledges the importance of accessible leisure facilities. Alternative transport options and support schemes are being reviewed to assist residents with mobility or financial challenges.”

In a supplementary question, the member of the public asked what accountability mechanisms exist when decisions with inaccuracies are made. It was advised by Councillor Wood that there would be a written response that will appear in the minutes.

Question from Alison Lacey to Councillor Bialyk, Leader

“Where will special needs children and schools swim when Northbrook pool is closed. Please explain how SSPs profitability will be affected when it has to close admittance to the public to continue with the education of Exeter’s children and how does your decisions follow the localism act of 2011.”

Response from Councillor Bialyk, Leader

“Provision for school swimming will be maintained through scheduling at other facilities. The council continues to assess the impact on public access.”

In a supplementary question the member of the public asked if schools would be able to continue using their own teacher at SSP, as they provide their own instructors. The Leader advised that this would be dealt with by staff in conjunction with the schools.

Question from Sarah Hornsby to Councillor Wood-

“Concerning the Exeter Vision 2040, in ECC’s current Corporate Plan, what is your strategy for achieving the aim of having a ‘year on year increase in residents using leisure centres’ when St Sidwell’s Place is running at nearly full capacity and you propose to close Northbrook Swimming Pool?”

Response from Councillor Wood

“While swimming pools occasionally reach capacity during peak periods, particularly school holidays, our leisure centres as a whole are not operating at full capacity. Our broader objective will allow for increased participation by ensuring efficient use of facilities, expanding programme offerings, and maintaining accessibility across all sites.”

In a supplementary question, the member of public asked if SSP was full, would they have to go to Riverside instead.

Councillor Wood advised that SSP is not full, and there was capacity.

Question from Richard Isley to Councillor Bialyk, Leader

“ECC have an annual budget of £23 million. The remedial work to keep Northbrook, an essential community facility, operational is less than 0.5% of that total. Given the physical and mental health benefits to both the young and elderly city wide, surely this should be taken into account when considering spending priorities.”

Response from Councillor Bialyk, Leader-

“All expenditure must be considered in the context of long-term financial sustainability, operational efficiency, and strategic priorities.”

In a supplementary question, the member of the public asked if the Council was able to see how waste reduction linked with productivity would provide funds to support Northbrook.

This was not answered as was not a supplementary question related to the answer given.

Question from Tracey Preece to Councillor Wood-

“SSP is overwhelming, intimidating, loud, impossible to swim in when you have mental health issues. Many will be overwhelmed, unable to manage the complexity of the building. It does not offer the intimate relaxed friendly and supportive environment needed. Where can I swim if I have challenges such as Autism?”

Response from Councillor Wood-

“The council recognises the need for inclusive environments. Efforts are underway to improve accessibility and sensory-friendly options at existing facilities.”

A supplementary question was asked regarding how Council could justify the closure, when the Equality Act 2010 aims to promote equality for all. Councillor Wood advised that the Equality Act 2010 was taken into consideration against all relevant decisions of the Council. He also clarified that there had been no decision to close Northbrook pool yet, only a proposal. An Equality Impact Assessment would also be carried out to ensure citizens needs were supported.

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PETITION - SAVE NORTHBROOK POOL

The Lord Mayor invited Angela Martin to speak on behalf of the petition organiser, who presented and spoke on the following petition, entitled “Save Northbrook Pool” which had gained 2231 signatures.

“Lord Mayor, Councillors, no decision can justly be made about closing Northbrook Swimming Pool without data verified as accurate. Leisure services are looking for a £586,000 cut in budget. We have worked out ways to cover this. We are told the three swimming pools have 12,000 members. If only half of them paid a membership fee equal to that charged by other Devon towns the resulting income would be in the region of £590,000. Cuts covered. In addition, the lease with Northbrook Trust left is much longer than the 15 years needed for ECC to make a commitment to Northbrook swimming pool to receive a grant from Sport England and Swim England. This grant has been approved before but someone in ECC believed the lease was left only 9 years and not the 70-odd our information tells us and so turned it down. This could be re-applied for.

The Willow Grange development increasing the population close to Northbrook swimming pool will yield a CIL of £818,772 this could also be used, even in part for maintenance and upgrading the building which has been sorely neglected. Then there is the matter of managing the income of the pools. £60,000 of club fees were

not included in the figures presented in February. The Leader of WEFTE was left holding £7,000 worth of fees because no one knew how to process it. It is too easy to walk into Northbrook for a pay as you go swim with no one on the desk to take the money. So, we have no idea the total losses made in this way, and it does mean that Exeter City Council has no idea how many people are using the pool because it is not recorded.

Membership is across the three pools, so this is no indicator either of the number of members who use Northbrook. Nor do we know the savings in the long run for the NHS or the care services because people are using Northbrook to help their physical and mental wellbeing often on doctor's orders.

It is an important facility for the local schools who are bound by the national curriculum to ensure their pupils can swim. Its small size, quietness, calm and closed environment and friendly atmosphere is where the school can provide its own 1:1 supervision. Makes it a safe place for the students of Ellen Tinkham School who are autistic and have sensory disorders. Why seek an alternative when we already have one here.

Because the prescribed characteristics of the majority of the clientele using Northbrook, ECC would need to be very careful it does not fall foul of the 2010 Equality Act. If you want to keep it, you should use it – well it's difficult if you don't finish work before three o'clock which is when the pool closes. It closes at 12 noon on a Saturday and doesn't open at all on the Sunday. When can people who go to school or go to work swim?

The large function room is unused and unprofitable whereas before it was used for birthdays and other celebrations. We wonder what was meant in you February meeting when it was declared that extensive efforts to drive income and footfall have been made. If something as simple as the extension of opening hours was not tried. As it is out of hours casual swims and evening clubs' income is still lost. Despite this erosion of income Northbrook had the lowest subsidy of the three pools in 2023/24. This facility is such incredible value for money. It provides a calm, welcoming, uncompetitive environment that is so good for our people who have enough to cope with without the rigours of travelling into the city centre by public transport for a swim.

So, we need the council to obtain completely accurate accounts and attendance records for Northbrook, so the true situation is totally clear.

And apart from all that you have heard we need an impact assessment please. It's a vital facility for the city, for the vulnerable and of course when there is a price to be paid it's always those who have to pay the price."

During discussion, Members made the following comments in support of the petition:

Councillor Pole: -

- was pleased to have secured repairs to the women's showers at Northbrook pool after contact from a Mincinglake and Whipton resident; and
- had been contacted by several residents who had swum at Northbrook pool and advised that she was committed to providing a relaxed atmosphere for residents.

Councillor Haigh: -

- on behalf of the Independent Equity Group, thanked the residents for working hard on both the petition and the campaign;
- highlighted that Northbrook Pool was a unique small space, which enabled those with Protected Characteristics to swim comfortably;
- highlighted concerns regarding the long-term intentions of the Northbrook Trust, from whom Exeter City Council leased the pool; and
- made suggestions as next steps for the Council;

1. invite Northbrook Trust to a public meeting;
2. an Equality Impact Assessment and consultation be published; and
3. that no decision be made until councillors have seen full facts and understand ECC financial position.

Councillor Holland: -

- stated that the benefits of swimming, leisure and health were well documented, and that it was the ideal pastime for people of all ages and ability, to exercise;
- felt that Exeter City Council had to make unenviable choices when setting a balanced budget;
- Exeter City Council were committed to maintaining and improving the statutory services and that was an overarching requirement when making decisions on spending; and
- he was glad that this had been referred for further discussion, and he supported it fully.

Councillor Knott: -

- commended those who had brought the petition to Council; and
- believed that Members had a duty of care for the money for which they were responsible, and decisions were made having received as much information as possible and welcomed the opportunity to hear all the information at a Scrutiny Committee.

Councillor Cookson: -

- was happy to receive this petition and was very keen to hear from users of Exeter City Council services.

Councillor Miller-Boam: -

- gave thanks to those who had presented the petition to Council;
- gave thanks to officers who had made sure residents and users could share their thoughts throughout the consultation process;
- there were no good solutions, but the impact of the decision must be balanced against the consequences on keeping it open; and
- the information shared this evening, alongside the consultation and the equality impact assessment would be considered in detail before any decisions were made.

Councillor Parkhouse: -

- stressed the importance of petitions in democracy;
- thanked council officers who had heard these petitions as one; and
- reiterated that engagement in petitions strengthened democracy.

Councillor Moore: -

Councillor Moore moved and was seconded by Councillor M Mitchell a Notice of Motion in the following terms: -

“That the Council refers the petition to Customer Focus Scrutiny Committee prior to Executive determining the matter. Petitions, Officers, and Northbrook Trust are invited to present evidence to the Scrutiny Committee.”

In presenting her motion Councillor Moore made the following points: -

- she felt it sad that the potential closure of Northbrook Pool had not been highlighted before the budget was discussed in February;
- a business case would help the Executive to make a decision; and

CUSTOMER FOCUS SCRUTINY COMMITTEE - 27 MARCH 2025

Councillor Rees, current Chair, deferred to Councillor Parkhouse as Chair at the time of the meeting. The minutes of the Customer Focus Scrutiny Committee of 27 March 2025 were presented by Councillor Parkhouse and taken as read.

RESOLVED that the minutes of the Customer Focus Committee of 27 March 2025 be received.

STRATEGIC SCRUTINY COMMITTEE - 3 APRIL 2025

The minutes of the Strategic Scrutiny Committee of 3 April 2025 were presented by the Chair, Councillor Pole.

In respect of **Minute No. 65 Portfolio Holder report – Portfolio Holder for Leisure Services and Healthy Living**, Councillor Moore stated that she had asked a question regarding the governance models for the Wonford Community Hub, how that decision would be made and whether the answer would be put on the website to enable the community to understand. In response the Portfolio Holder, Councillor Wood stated that a response would be forthcoming and could be placed in the website.

RESOLVED that the minutes of the Strategic Scrutiny Committee of 3 April 2025 be received.

EXECUTIVE COMMITTEE - 20 MAY 2025

The minutes of the Executive of 20 May 2025 were presented by the Leader, Councillor Bialyk.

In respect of **Minute 42 (Review of Equality, Diversity and Inclusion Policy)**, Councillor Parkhouse spoke of the importance of the revision of policies. The Leader moved, and Councillor Wright seconded the recommendation **that the Council approve the adoption of the revised Equality, Diversity and Inclusion Policy** and following a vote was CARRIED.

In respect of **Minute 43 (Disposal Report Seeking Authority to Dispose of the Former Clifton Hill Leisure Centre)**, Councillor Harding felt it important that it would be 100 percent affordable and not designated for student housing. Councillor Harding also raised the point of community engagement and asked how that would be delivered.

Councillor Ketchin raised that the Leader was open to an access strip for the Portland residents that had been promised previously, as a condition of the site sale.

Councillor Patrick delighted to see this site developed and provide much needed housing for older residents. Asked for reassurance from the Leader, that once the site is sold, it cannot be used for other types of housing.

The Leader responded to members comments in the following terms:

- public engagement would be carried out through the planning process;
- the development would be exclusively for over 55s; and
- he was confident that the Council would make sure it was not used for anything other than 72, over 55s affordable homes.

The Leader moved, and Councillor Wright seconded that the Council approve a budget for £50,000 funded by anticipated capital receipts to cover disposal costs, including external agency and legal fees, associated with this sale which following a unanimous vote was CARRIED.

OVERVIEW OF GENERAL FUND REVENUE BUDGET 2024/25 - QUARTER 4

The Leader, Councillor Bialyk, presented the report.

Councillor Moore questioned the significant underspend in some areas of the Council budget and asked how the Executive planned to build capacity to deliver against the budget.

Councillor Banyard raised a question regarding the £200,000 put aside to look after leisure buildings and queried whether this could be used to create a proper business plan for Northbrook Pool.

Councillor Wetenhall questioned whether the search for alternative council premises was still underway and whether a move would happen before any development with the potential unitary changes.

The Leader and the Section 151 Officer responded in the following terms:

- the Executive were meeting frequently to keep an eye on this;
- the £200,000 had already been spent by leisure;
- there would be a feasibility study presented to Council regarding any move, and should a further budget be required all necessary information would be provided at that time; and
- regardless of the future of the authority, it was anticipated that a place in Exeter would always be necessary.

The Leader moved and Councillor Wright seconded the recommendations which following a vote were CARRIED.

2024/25 GENERAL FUND CAPITAL MONITORING 2024/25 AND REVISED CAPITAL PROGRAMME FOR 2025/26 AND FUTURE YEARS

The Leader, Councillor Bialyk, presented the report.

During debate Councillor Moore commented on the Mallinson Bridge, and asked what Exeter City Council (ECC) were doing to request that Devon County Council report to ECC and explain why these delays had been allowed to happen, and whether Mallinson Bridge must be used for walking and cycling.

During debate Councillor Rees asked for updates regarding the schedule of consultation for refurbishment of the pools and play equipment in Heavitree Park.

During debate Councillor Read asked for confirmation on the budget that would be spent in the coming year for the works to the city wall.

Responding to questions from Members, the Leader made the following points:

- Devon County Council had now been in contact with Exeter City Council regarding the funding of the bridge and the Leader would be discussing this with the Directors in order to feedback to Members. DCC owned this project, and the Leader would discuss with the Leader of DCC when the opportunity arose. It was important that Mallinson Bridge was separated and for pedestrians and cyclists;
- the splash pools in Heavitree and St Thomas would be open; the consultation was regarding the play equipment. They were separated to ensure that the splash pools were able to be opened as soon as possible. The Station Road park in Exwick cost £70,000 to refurbish, but it was important that children's play equipment was long-lasting, and that the appropriate assessments had been undertaken; and

- the budget used for the works on the Roman wall was an operational matter, and he would talk to Directors regarding this and works undertaken during the year.

The Leader moved and Councillor Wright seconded the recommendations and following a unanimous vote, were CARRIED.

48 **2024/25 HRA BUDGET MONITORING REPORT – OUTTURN**

The Leader, Councillor Bialyk, presented the report.

Councillor Moore speaking as opposition co-leader, welcomed some of the items in this budget, particularly the issues surrounding long-term leases to secure temporary accommodation.

The Leader moved and Councillor Wright seconded the recommendations and following a unanimous vote were CARRIED.

49 **TREASURY MANAGEMENT 2024/25**

The Leader presented the report and moved the recommendations which Councillor Wright seconded and following a unanimous vote, the recommendation was CARRIED.

50 **UPDATE OF EXETER CITY COUNCIL'S COMPANIES, ALTERNATIVE DELIVERY MODELS AND CHARITIES.**

The Leader presented the report.

During debate Councillor Read asked for clarity regarding the ear-marked reserve for ECL, and the report for ECL and what that would be used for. She asked for comment on Exeter Science Park financial viability, and their capacity to plan for future development as stated in the report.

The Strategic Director for Corporate Resources responded making the following points:

- the ear-marked reserve was ECL property support and supported the ECC funding of sales of land to ECL. ECL had been wound down but sales of land had continued and the ear-marked reserve was now being used for its intended purpose; and
- ESVL loss still required high level occupation to break even, and it was just below that at the moment which resulted in loss. The onus was on shareholders to work with the company to enable propositions to come forward.

The Leader moved the recommendation, seconded by Councillor Wright and following a unanimous vote was CARRIED.

51 **GENERATING INCOME TO FUND NET ZERO ACTIVITY**

The Leader, Councillor Bialyk, presented the report.

During debate Councillor Wetenhall stated felt there had been a failure to consider alternatives to using the bus station as a car park. The space provided opportunity for a range of uses, and no discussion had been had with an interested party. Would like to note the failure to consider funding for the climate change team outside of building a car park.

Councillor Vizard agreed that this was the only idea that had been brought forward and came forward as part of budget discussions. The Net Zero Team were carrying out great work across a huge number of different areas. The report stated that there would be a loss of 500 parking spaces following the sale of the Mary Arches carpark, and this proposal would add 50 spaces. We do need to provide for business and make sure the city centre is accessible. He would like to see an alternative but at present it was lying empty.

Councillor Hughes welcomed the potential for accessible parking near St Sidwell's Point as they had heard from the petitioners for Northbrook Pool that parking at SSP was an issue for them. It would be great if there were some disabled parking spaces;

Councillor Patrick considered this a pragmatic use of the space. Transitional processes were required whilst the public moved to active travel and public transport. This was a short term, temporary use and low cost to implement and did not prohibit other ideas for the future.

Councillor Moore raised that there was already a car park near the site and stated that in December 2024 the Executive agreed that in early 2025 a proposal would be brought forward for the development of this site. General Fund Report highlighted costs associated with the demolition of the bus station, roughly £46,000 spare. There was money available to turn it into a meanwhile use car park and meanwhile use gives up opportunity to explore other things on the site.

Councillor Ketchin asked if there was potential for different uses at weekends to week-day use.

Councillor Wright reiterated that she was an advocate for people and businesses in the city, who have concerns about the amount of parking in the city. Losing 500 parking spaces would have a knock-on effect on businesses in the city. She was not comfortable with the route taken by an interested party in raising their business plan.

Councillor Read raised her concern about using a car park to fund net zero. There was a car park nearby that wasn't always full, and officer assessment said it was under capacity. There was no demonstrable need for another car park. Other councils such as Frome, and Barnstaple, have covered markets and she wondered why Exeter did not have one. Once the car park was established, there would be no way of guaranteeing that it would be a meanwhile use. If disabled spaces were needed, these should have been provided when SSP was built. She felt that there had not been enough scrutiny of this decision.

Councillor Holland stated his belief that there was an unmet demand for parking spaces in the centre and he hoped that this car park would be ready for use in time for the Christmas period. This was a golden opportunity to provide parking for those with disabilities to be able to use SSP.

Councillor Palmer spoke against the establishment of a car park at the former bus station. She stated that the ECC does brilliant work for the environment but this proposal would undo all the good work. People living in deprived areas had poor quality air, more pollution, and less access to green spaces and by building a car park at the former bus station this would be worsened. She stated that personally, if car parking spaces were such a concern perhaps Mary Arches car park should not have been sold.

Councillor Knott spoke in favour stating that the Council's Estates Team did an excellent job at drawing-in additional revenue from spaces, and he referred to Matford, where the space was being used 7 days a week. He stated his belief that it was very much a meanwhile use and temporary. It would provide a safe space and allow the area to be developed properly in the long term.

Councillor Parkhouse spoke in support of the proposal but noted a contradiction regarding car parking but Net Zero was important to the council and this proposal put action on the table to fund this. It was also of note that the Council was heavily reliant on car parking revenue, and this would support the aims of the council.

In response the Leader made the following points:

- the site had been in its current state for over a year now;
- the £200,000 needed for the Net Zero team was identified by the Section 151 officer, no alternatives had been brought forward;
- Councillor Ketchin made a good suggestion regarding the multi-purpose use of the space;
- ECC was one of the few councils in Devon who did not charge blue badge holders for parking;
- there were major challenges in the city, but ECC were trying their best;
- all information regarding Northbrook would go to the Scrutiny meeting on 23 June, and all Portfolio Holders would be asked to attend;
- 35 spaces would be lost in Newtown to bring forward the Live and Move programme;
- the council wanted to encourage people into St Sidwell's Point.

The Leader moved, seconded by Councillor Wright the recommendations and following a vote were CARRIED.

The meeting was paused at 19:54 and reconvened at 20:08

52

EXTENSION OF THE PUBLIC SPACES PROTECTION ORDER

The Leader, Councillor Bialyk presented the report.

During debate Members made the following points:

- there were issues surrounding the lack of police enforcement of the current PSPO;
- could it be ensured that the Police used the powers, we have afforded them, as it did not always appear that they did, this could be raised at the next Councillor and Police meeting;
- this was an important package of measures in the City centre to address antisocial behaviour. If it was not extended residents would be wondering why.
- It was important to address the reasons why crime and antisocial behaviour took place, as well as provide support for people with vulnerabilities;
- it was not a crime to street drink in the areas covered under the PSPO, it was enforceable if the police made a judgement regarding criminality to request surrender of alcohol due to behaviour displayed;
- the PSPO formed part of the bigger picture of tackling ASB, and a subgroup of the CSP were looking at how best to make improvements; and
- a Member had been told by police that the PSPO was one necessary tool, but it must be seen as one part of a bigger picture. Some individuals were not just creating a nuisance but were deeply vulnerable and he asked the Leader if some money from Fixed Penalty Notices might be used in tackling these issues.

Councillor Moore, as co-Leader of the Progressive Group, stated that when she joined as a councillor she was concerned about how this would affect people, especially those who were street-attached. The data provided was very helpful, and the new community safety team had been learning how to take action under the PSPO. There had been positive feedback from businesses and it would take the whole community to deal with this and provide support.

The Leader responded to Members comments making the following points:

- these measures were introduced 6 or 7 years ago and were amended considerably due to concerns from Members;
- public attitude towards ASB had changed since the PSPO was first introduced;
- there was now more intolerance towards ASB;
- nothing was changing but there would be a review in a few years' time; and
- he would find out how many people were charged but believed that was not the first step taken.

The Leader moved the recommendation and was seconded by Councillor Wright and following a unanimous vote, were CARRIED.

53

**NOTICE OF MOTION BY COUNCILLOR MOORE UNDER STANDING ORDER
NO. 6**

Councillor Moore moved and was seconded by Councillor Banyard, a Notice of Motion in the following terms:

“Local Housing Allowance (LHA) rates are used to calculate Housing Benefit or universal Credit for tenants renting from private landlords. Exeter, like other areas, is experiencing a housing crisis and suffered unsustainable rent increases across the private rented sector and loss of homes to Air B&B and HMOs. This situation is recognised in the Devon Housing Commission Report 2024. Average rents in Exeter are, in March 2025, as high as those in the South East of England.

The LHA rates are based on the 30th percentile figures from twelve months' letting information in the Broad Market Rental Area but are insufficient to cover even the cheapest rooms or homes in Exeter. LH Rates have been subject to a freeze since 2020 and the Labour Government has confirmed the rates will be frozen at current levels until 2026.

When a local authority places a household in temporary accommodation (TA) it can claim back the incurred costs associated with the provision of the TA from the Department for Work and Pensions (DWP). Apart from households placed in council-owned stock outside the Housing Revenue Account (HRA), for which a local authority can reclaim up to the current Local Housing Allowance (LHA) rates, the local authority can generally reclaim up to 90 per cent of the January 2011 LHA rates, which were set based on the rental costs at that time. These rates are now outdated and do not accurately reflect current market conditions. The gap in financing between what local authorities initially pay and what is eventually reimbursed by the national government is known as the Temporary Accommodation Subsidy Gap. The current reimbursement system, which largely relies on these outdated 2011 rates, exacerbates this Subsidy Gap.

As such Council:

- 1) acknowledges the endemic housing crisis affecting our communities across Exeter and the current inadequacy of Local Housing Allowance, frozen since April 2020;
- 2) notes that Local Housing Allowance has not kept pace with rising rents;
- 3) expresses concern that Temporary Accommodation Subsidy Gap places additional strain on local authority budgets.
- 4) implores Government to commit to immediate interventions to alleviate the housing and homelessness emergency in the short term; and
- 5) notes the anomalies in the LHA guidance in relation to the Shared Accommodation Rate, for example:
- 6) the rate applies to single people without children aged 25-34 - which limits opportunities and lifestyle choices;
- 7) Multi Agency Public Protection Arrangements (MAPPA) limitations apply from age 25;
- 8) pregnant women under the age of 35 pregnant are expected to be accommodated in an HMO and can only apply for a higher rate for a one bed property *after* the birth of the child.
- 9) notes that the Exeter Broad Rental Market Area for Exeter covers a very large rural area, so drags down the LHA making rental properties in the urban area unaffordable.

Government to

- 1) unfreeze, relink and consistently uprate the Local Housing Allowance levels so they cover rents for the 30% cheapest private rented sector properties⁴ in every local authority area; and address the Temporary Accommodation Subsidy Gap;
- 2) redefining the Broad Rental Market Areas covered by Local Housing Allowance at a level that better reflects local rental markets; and
- 3) review the Shared Accommodation Rate anomalies listed above to lower the MAPPA age and enable pregnant women to apply for a higher rate before the birth of their child(ren)."

In presenting the Motion, Councillor Moore made the following points:

- people were losing family networks as they could not afford to live in the City;
- LHA provided allowance through Universal Credit, in February 2025, 4580 households on UC were working, and 7169 were not in work. Almost 7% of households in Exeter were in receipt of housing benefits; and
- in 2022/23 Customer Focus Scrutiny Committee looked at homelessness, and was referred to the Devon Housing Commission, this motion was a continuation of that work.

Councillor Banyard, as seconder, spoke in support of the motion:

- LHA rates were set according to rental market area and extended past Hatherleigh. It would take 1 hour and 38 minutes to get a bus into Exeter from Hatherleigh; and
- rates were not set by looking at what was affordable in Exeter but looking at what a small flat might cost in a rural area such as Hatherleigh.

During debate, members spoke in support of the motion making the following comments:

- regarding temporary accommodation there were quality concerns, and costs had continued to rise which meant there was an overspend of the budget. The Council would now be switching to long term leases, and aim to reduce unit costs, and improve quality;
- long term leases would enable break even at 95% occupancy levels;
- there was a housing crisis in Exeter, and it was difficult to find affordable accommodation;

- the LHA required a review of boundaries and levels, and hopefully the Council would investigate this irrespective of this motion;
- more housing needed to be built, and for those to be affordable; and
- housing was seen as an asset rather than a place to live.

In summing up, Councillor Moore made the following points:

- an update on temporary accommodation was welcomed;
- concerns over rent inflation were understood;
- LHA expected to be sufficient to fund the cheapest accommodation hence the Hatherleigh drag issue; and
- she welcomed the comments on working together through the LGA.

Following a unanimous vote the Motion was CARRIED.

54

NOTICE OF MOTION BY COUNCILLOR KETCHIN UNDER STANDING ORDER NO. 6

Councillor Ketchin moved and was seconded by Councillor Wetenhall, a Notice of Motion in the following terms:

“This motion proposes that capital receipts from the sale of ECC-owned green field sites or land never developed that is for all intents and purposes green field site, be used solely for the purchase of other green field sites within the Exeter City Council boundary or immediately adjacent vicinity.

Background

England is the second most densely populated major country in Europe. Consequently, with huge pressure on land England is also cited as one the most nature deplete country in Europe and has the lowest 'nature connectedness'.

Regarding Exeter, many of the finest and most appreciated public assets are its river and valley parks. They provide recreational and natural amenity. These important elements of a liveable city are captured in some of our guiding documents, the with Corporate Strategy 2022-26 and new Exeter City Council Local Plan. Once greenspace is developed it is typically lost to the public and natural domain permanently.

The development hierarchy of habitat loss is avoidance-reduction-mitigation. Where the council chooses on balance to develop green space, it can follow the second principle of harm reduction.

However, this motion recognises Exeter City Council does not have a robust mechanism to mitigate. There is a practice to intensify biodiversity in land through development design, the practice of "biodiversity net gain". This can be viewed as improving the quality of existing biodiversity in a given space. In the case of green space development, in effect nature quality is expected to compensate for the loss of space. This may have validity, but clearly the practice of pushing natural habitat into every smaller and smaller but better-quality parcels have rapidly apparent limits. This is particularly the case in our urban setting Biodiversity net gain is arguably a concept best applied to brown field and grey field sites.

Perhaps even more importantly for an urban setting, this model of concentrating nature, says nothing for public access to green space for recreation and wellbeing. For these reason that is why this motion has come forward. As Exeter rapidly runs out of development space, the loss of greenfield space to the public domain is increasingly aired by residents and apparent to all.”

In presenting the Motion, Councillor Ketchin made the following points:

- Exeter was one of the most pressurised cities in the UK as the boundaries were tight, and the rate of growth was high;
- green land which was immediate and accessible to residents was being squeezed and this motion aimed to mitigate this; and
- there were areas within the city boundaries that were not developed and could be bought to improve wellbeing and increase recreational facilities like the Valley Parks.

Councillor Wetenhall, as seconder spoke in support of this motion, making the following points:

- the local nature recovery strategy of Devon was to be published soon, and ECC were a partner; and
- biodiversity net gain could be put by developers anywhere in the country.

Members speaking made the following comments in relation to the motion:

- Exeter already has excellent green spaces, such as the Valley Parks that were currently looked after Devon Wildlife Trust;
- this motion appears restrictive, and there were no robust mechanisms for mitigation;
- biodiversity was becoming an issue, there were no swift boxes in new developments;
- the next generations should be healthy but the opposite was true as many did not have access to green space;
- this was not deemed the right strategy for Exeter; and
- this could make it harder to deliver affordable housing, as it could drive up the cost of greenfield sites.

Following a vote, the motion was NOT CARRIED.

55 **QUESTIONS FROM MEMBERS OF THE COUNCIL UNDER STANDING ORDER
NO. 8**

There were no questions from members.

(The meeting commenced at 6.00 pm and closed at 9.05 pm)

Chair

Response from Councillor Wood to Colleen Natola-

No decision has been made, and we note that the question is speculative so we cannot respond however, we are not aware of any evidence of significant inaccuracies.

Response from Councillor Bialyk, Leader to Richard Ilsley-

“The Leisure service is a discretionary service provided by Exeter City Council. The service receives a subsidy as part of the Councils’ commitment to promoting advice and healthy lifestyles. There is no fixed threshold of regular elderly swimmer required.”

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EXETER HARBOUR BOARD

Thursday 12 June 2025

Present:-

Councillor Williams, R (Chair)
Councillors Cookson, Read, Snow and Sheridan

Apologies

Councillor Rolstone.

13

APOLOGIES

Apologies received from Councillor Rolstone.

14

MINUTES

The minutes of the meeting held on the 17 March 2025 were taken as read, approved and signed by the Chair as correct, subject to the amendment that in Minute 4, the word “three” is changed to “two” external vacancies on the Board.

15

DECLARATIONS OF INTEREST

No declarations of pecuniary interest were made.

16

LOCAL GOVERNMENT (ACCESS TO INFORMATION ACT 1985) - EXCLUSION OF PRESS AND PUBLIC

17

PUBLIC QUESTIONS

A member of the public, Mr Frost submitted the following question, asked by Ms Evans in his place:

- “It is not clear from the accounts that there is any separate reckoning of moorings (a commercial enterprise) costs, fees and wages, compared to other EPA costs. Can the council please separate these streams of finance so that the running of the EPA operations is more transparent?”

The Chair advised that mooring repairs, including all costs associated with the delivery of the commercial service, are separated within the services budgets and have their own budget lines.

Ms Evans, in asking a supplementary question, enquired where these were made available for the public to see?

The Chair passed the question to the Head of Service Operations, who advised that this information is reported through the General Fund Reporting Programme through the Council.

Head of Service Operations provided an answer to the supplementary question; “Councils annual budgets accounts can be found on the following Council Page , [Annual accounts - Exeter City Council](#) in which the actual accounts commence from approximately page 29 onwards. Income & expenditure is broken down but not to a high level of granularity, however, members of the public can request additional detail through the Councils Freedom of Information process.

In comparison to the full Waterways budgets, the General fund mooring budget outturn report shows the budget was balanced for 2024/25-year end with income offsetting additional budget expenses “(See table).

Account description	ANNUAL BUDGET	OUTTURN FORECAST
PAY	126,180	129,078
SUB-CONTRACTORS & WORKS	2,000	0.00
BUOYS	0	0.00
RENTS	0	6,561.40
EQUIPMENT TOOLS AND MATERIALS	4,310	333
VOLUNTEER/STUDENT ESPENSES	0	5
BOAT MAINTENANCE	0	1,146
MOTOR FUEL	1,650	0
CAR MILEAGE ALLOWANCES	0	31
SALES	-3,850	-1,718
FEES	-16,920	-16,228
BUOYAGES	0	-17
MOORING SERVICE	-31,660	-40,331
WATERWAYS CONTRACT SERVICES	-2,450	-30,580
RENT	-42,780	-33,932
F231 Total	36,480	14,348

The Chair offered to direct Ms Evans to the appropriate place.

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CHAIR'S ANNOUNCEMENTS

The Chair welcomed the new External Members of the Board, Shelley Rhodes and Harry Temple, as well as the newly appointed Councillor J Cookson. The Chair expressed a wish for proper introductions following the arrival of a late Member. The Chair provided the board with the following announcements: -

- Mr James Hannon, the new DP (designated person), visited Exeter and spent the day with the Waterways Team;
- Anthony Garrett has completed his term as an External Member of the Board, and the Chair would like to send the Boards thanks for all his hard work, enthusiasm, and contributions to the Board; and
- the Chair asked the Harbour Master to update the Board on meetings scheduled for April 2025. He advised that the asset survey of sea defences partly completed, but there had not yet been a meeting to discuss the findings of the survey.

The Chair then welcomed questions from Members, providing the following answers: -

- the emergency action plan had been written, and had been sent to the DP for sign off; and

there had been no further progress with the floating restaurant/bar at the quayside (previous agenda no.7), but the Harbour Master would still be happy to discuss with Members further

19

EXETER PORT USER GROUP UPDATE

The Chair of the Exeter Port Users Group (EPUG), Rex Frost was unable to attend this meeting, and sent Jane Evans, in his place. His update (appended) had been circulated to Members and was taken as read, and the following discussion points were made: -

- thanks were given to the Harbour Master for providing another additional

Channel Marker;

- it is evident that the weekend patrol boats had been a success, and that boat driving behaviour had seen an improvement; and
- there is now a date set for the Exmouth and Exeter East MP, David Reed, to view and discuss the river, with the hopes of improving his understanding of the problems and attractions of the river.

20

SOUTHEAST DEVON WILDLIFE- JOINT HABITAT MITIGATION STRATEGY **2024**

The Chair welcomed Neil Harris, Habitat Regulations Delivery Manager (East Devon District Council) from Southeast Devon Wildlife to the meeting, who provided a presentation on 'A Joint Approach to Habitat Regulations Mitigation'. The presentation discussed the following points: -

- Our history;
 - the strategy is a joint approach to habitat regulations and mitigation, formally constituted in 2016;
 - habitat regulations are a critical legislative requirement for local plan delivery, placing a legal duty on competent authorities to ensure mitigation is delivered before granting permission for any plan or project likely to affect European sites;
- Southeast Devon;
- Our Sites;
 - Devon contains internationally important wildlife sites; the Exe Estuary, Dawlish Warren, and East Devon Pebblebed Heaths, all with the highest environmental designations;
- Decision Making;
 - Natural England has oversight on delivery of mitigation delivery; and
 - decisions are largely made using visitor strategies, which are then referred to an officer working group, there is an annual business plan, and a 5-year business plan. This goes to committee for ratification, and there is a review of measures each year.
- Mitigation Delivery; and
 - wildlife wardens;
 - Devon Loves Dogs;
 - public awareness campaigns;
 - visitor access improvements;
 - complete redesign of signage;
 - Suitable Alternative Natural Green Space (SANGs)
 - Dawlish Countryside Park- funded through Council partners and is secured with a 999-year lease to The Land Trust.
- What Next?
 - new local plans;
 - increase housing targets;
 - new strategy;
 - devolution; and
 - Planning and Infrastructure Bill.

The Habitat Regulations Delivery Manager responded to Members questions as follows: -

- there is increasing concern from charities nationally about the Planning and Infrastructure Bill;
- it is a legal requirement for new housing developments to be assessed, and this is carried out extrapolating data from current population access patterns;
- financial contributions are collected by council finance departments through

- planning obligations (Section 106 and Community Infrastructure Levy);
- the mitigation strategy has been developed with careful input from stakeholders and council partners to ensure appropriateness and proportionality;
- The strategy aims to provide certainty that environmental impacts will be addressed; and
- SANGs are classified as a priority infrastructure, which guides related planning and funding decisions, they are required to have 8 hectares per 1000 new population.

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HARBOUR MASTER'S REPORT

The Harbour Master updated Members on the following: -

- a brief update into the investigation following the death of Delvin Musakwa;
- a review of canalside and quay signage was being undertaken and additional risk assessments for swimming in the canal;
- the smalt net has been removed;
- a canoe race down the river and the canal will be held next weekend, the canoe club has been asked to introduce another turning mark to reduce congestion during the race;
- there is still an issue with abandoned boats, with the three boats that broke free from their moorings last autumn still in situ. Where the owner of the boat is known efforts are being made to have them removed. The council will have a statutory obligation to do something about them if they become a hazard;
- recruitment of volunteers for the patrol team will begin soon as summer starts to progress;
- the Friends of Exeter Ship Canal were taken out on the water to ensure they were comfortable using the new electric motor in the patrol boat; and
- Ashfords have been in contact and progress will soon be made towards starting the 42-day consultation period for the Harbour Revision Order.

The Harbour Master responded to questions from members as follows: -

- the buoys placed off Sidmouth and Budleigh Salterton beaches are reduced speed buoys, however it is local acceptance that these are informal swimming area makers, though not legally defined as such;
- in discussions with the Head of Waterways team regarding the wording that needs to be put on signs;
- supplementary budget has been carried over to enable funding for Turf Lock gates;
- a barge along the canal that was being rented had been recently purchased at a reduced rate and they are in the process of working out a long-term plan for its use. This was supplemented by the Head of Operations, who made it clear a business case can be found in the Council minutes;
- there are numerous risk assessments for the canal, but these will be reviewed as part of the process following an incident in May.

The Chair then asked the Harbour Master to discuss the visit from DP Mr James Hannon. The Harbour Master discussed the following points: -

- James Hannon visited in March and was shown the infrastructure of the canal, and visited Exmouth;
- he was also shown the extent of the Port limits;
- he has been invited to speak at the Executive Committee.

(The meeting commenced at 5.30 pm and closed at 6.41 pm)

Chair

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Report to the Harbour Board, June '25

The summer has indeed shown how much sand has washed into the river. Boaters are very pleased that the HM has laid yet another Channel Marker between No.13 and 15 buoys as they were struggling to see where the channel has moved to. The winter storms have not only washed away or submerged the smaller rubber tube at the end of the Warren but also destroyed many of the gabion baskets which originally protected that end. The tip of the warren has eroded so much that the Stuart Line mooring which was well protected by the Warren last year is now completely exposed to the English Channel weather.

The weekend boat patrols have been quite evident on many weekends so far and there is no doubt that generally boat driving behaviour has been an improvement.

The Exmouth and Exeter East MP, David Reed, has set a date of July 25th for a visit to view and discuss the river. Grahame and I hope to improve his understanding of the problems and attractions of the river and help him to see its part in making this part of Devon a big tourist attraction as well as an asset needing careful management.

Rex Frost

Chair, Exeter PUG

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Management Objectives

Management Objectives for the Marine Safety Plan have split its into two sets, the first addresses 'Standing Objectives' the second set addresses 'Period Objectives'. This plan is owned by Exeter City Council on behalf of the Duty Holder and aims to address high level targets which will benefit all port and harbour locations and fulfils the requirement of the PMSC for the Duty Holder to maintain a Marine Safety Plan.

Standing Objectives

	Number	Provision	Objective	Target	Evidence
	1	Duty Holder	Duty Holders to have received training on their role and responsibility under the Code in the last three years.	To appoint ECC Executive Committee as DH	Action complete. ECC Executive are now appointed as Duty Holder, most members have received training, new member will receive training in September 2025
	2	Designated Person	To have undertaken an operational tour of Exeter waterways in the last three years.	DP selected and appointed in March 2025	Mr James Hannon from ABPmer visited in late March, he has been invited to meet with the Duty Holders to brief on the changes to the Port Marine Safety Code and the Guide to Good Practice.
	3	Legislation	Report by the Designated Person to the Duty Holder at least once per year.	Not yet, but will be an annual review	Awaiting report
	4	Duties and Powers	MAIB Reportable Incidents: make all reports to the MAIB within 24 hrs, with investigation followed up.	24 hrs initial report, investigation at incident close	Maritime activity report
			Incidents recorded and investigated (if necessary) within the agreed timeframe.	Initial action 7 days, investigation closed in 30 days	Maritime activity report
	5	Risk Assessment	All Marine Risk Assessments to be in date.	100% complete	Strata Service Solutions Ltd have agreed to support MARNIS and we are awaiting

					procurement. Once that is in place we will be able to start the HAZID process
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	Number	Provision	Objective	Target	Evidence
	6	Marine Safety Management System	All Policies reviewed on a three-yearly basis.	To have plan produced and available to all stakeholders within 6 months.	Not yet completed. See below.
			The Marine Safety Management System will be reviewed annually (or following any significant incident, industry or legislative changes).	To distribute widely, to keep numbered and dated reviews. To liaise with other stakeholders on the waterways about their own responsibility to the PMSC	To keep as an agenda item at the Port User group meetings. Once MARNIS system adopted, contractor will conduct a HAZ ID exercise with key stakeholder groups
	7	Review & Audit	Internal Audit	Staff reviews annually. Document checks annually	Audit complete, matters raised have been addressed
	8	Competence	Ensure staff with marine safety responsibilities are trained to undertake their duties.	100% of Essential & 80% of Desirable completed	Maritime activity report
	9	Plan	Publish a three yearly 'Marine Safety Plan' (this plan).	Plan currently being prepared	Internal Audit
	10	Conservancy Duty	Aids to Navigation: Three-year performance meets or exceed IALA performance threshold	To carry out annual liaison and inspection with Trinity House	Constant monitoring of navigation channels. Survey information shared with Port User Group
			Hydrographic surveys in date	Survey of the approaches completed March 2025	

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Gap Analysis update

	Number	Provision	Objective	Target	Evidence
	13	PMSC	Liaise with marinas and boatyards confirming work towards compliance	2025	Done, emails sent by HM to boatyards signposting towards PMSC training and compliance with the code
	15	Harbour assets confirmed with MCA	Assets declared on the list held by the MCA in case of Civil Contingencies Act 1984	2025	Done, list of assets compiled and sent by HM to the MCA
	6	Update Admiralty chart no2290	Port limits to be shown on Admiralty chart no2290	2025	Done, liaised with UKHO, now illustrated on the current chart no 2290 Task complete

Period Objectives

	Number	Provision	Objective	Target	Responsible Officer
	1	Duties and Powers	General Directions	Introduce General Directions and repeal current Bye-Laws – With lawyers Ashford's currently.	Harbour Master This work is still on-going, awaiting HRO
	2	Duty Holder	Marine Facilities	Identify Marine Facilities within the port area and seek compliance with the PMSC	Duty Holder, on-going training with Harbour Master
	3	Competence	Training	Issue Training Matrix and ensure all staff have appropriate training as required to undertake their duties	Funding for training courses identified
	4	Marine Safety Management System	Management of Navigation	Carry out a formal Risk Assessment of navigable waters	Harbour Master Ongoing work, awaiting HAZID workshop to complete
	5	Conservancy Duty	Aids to Navigation	Review of all AtoN's in the port	Graham Manchester This is ongoing work, annual servicing of all Aids to Navigation has just started now that the moorings season has ended
	6	Marine Safety Management System	Liaison and consultation with stakeholder	Improve lines of communication in place with Port User Groups. Regular meetings with the Commodores from sailing clubs around the river to ensure collaborative approach to managing the different racing areas	Harbour Master Done, regular meetings in place and open lines of communication with all user groups maintained

Maritime activity report

Canal team

Regrettably, there was a tragic incident at Clapperbrook bridge on the 5th of May which led to the death of 15 year old Delvin Musakwa. We are working with the Coroner and the local police about the tragedy.

Other items to report

The 72ft Yacht Big Spirit finally left the canal last week. We had to wait for the high tide on Wednesday evening until the canal team could let her pass through the Turf lock gates into the river where two boats from the river team were waiting to escort the yacht down to a mooring just off the Exmouth marina entrance. The yacht has a deep draught of 3.2 metres so we had to make sure the transit down river on a 3.7 metre tide was within a surveyed channel.

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Turf lock gates continue to cause concern. At the time of this Harbour Board meeting there will be a team of commercial divers on site effecting some small repairs to the cill and surveying or monitoring the deterioration of the gate mitres. We have still not managed to recruit an engineer to the vacant position we had advertised, so we are looking at bringing in external engineers to oversee a condition survey of all the lock gates and bridges that we are responsible for.

The salmon smolt net is still in place at the King's Arms gates, hopefully by the time of this Harbour Board meeting the net will be removed and then the access through the gates to and from the river and canal will be left open unless we have extended periods of rain when the gates may have to be closed to prevent flooding.

Since the last meeting of this Harbour Board, another three dilapidated boats have left the canal for disposal. There are still some more to go.

As briefed many times before, the boat storage contract has been re-written and sent out to customers underlining the requirement to have adequate insurance to cover the costs of an emergency lift out of the water in case of sinking. The new contract also reinforces the message that boats berthed in the canal must be kept in a seaworthy condition unless as a project for restoration. Also, the berthing contract is only for 50 weeks of the year, meaning for at least two weeks in each year the boat must leave the canal.

The Friends of the Exeter Ship Canal have now been briefed on how to use the former patrol boat that we have passed over to them for their use. Currently, the group are working on plans for the use of the boat which will be to broadly support canal operations.

Finally, we have a new member of the canal team, Luke Warlow joined us at the beginning of May, we wish him well in his new role.

River team

The moorings barge Port Constructor has now been purchased by the council meaning that the risk of not having a suitable vessel to undertake this work and the statutory work of maintaining the aids to navigation in the river has now receded.

Port Constructor will have to be re-coded with the Maritime and Coastguard Agency through the MECAL system because of the change in ownership but that should be completed by the end of June.

We have completed our normal spring work for East Devon District Council or laying all the 8 knot buoys off Sidmouth and Budleigh Salterton beaches. Strictly speaking they do not mark or denote a swimming area, but it is generally accepted locally that this is what they are there for.

Similarly, we have laid all the 15 No Powered Craft buoys off Exmouth beach that stretch from no 7 buoy off the Lifeboat station to Orcombe point.

For the next few months, the main thrust of work in the river will be to patrol the river at weekends and at other busy times to maintain a presence, and the work of servicing all the local aids to navigation in the river, and there are over 50 of those to do.

This is an incredibly difficult task to achieve, especially when we must factor in the weather for example, plus staff holiday leave entitlement and other surprises that come along, especially when there are so few staff (only two full-time and three part-time).

The survey of different parts the river that we had done in the spring have been useful. The main channel leading into the river shows little change in the banks and depths, whilst in the river the surveys prove that Bull Hill back has spread much further to the west, so much so that we have had to lay another intermediate channel marker between the buoy known as Little Russell and no 15 buoy in the area of the Bight. We have also had to remove a large mooring that we had under licence to us, just to help maintain a safe channel through the area.

There is the perennial issue of abandoned boats that appear in the river, some stranded and some in danger of being stranded or even worse, sinking in the channel.

We are constantly in communication with the different mooring associations when we identify a suspect vessel, but it can often prove difficult to locate an owner and sometimes more difficult to get the owner to do something about the apparent problem.

Unfortunately, the forthcoming Harbour Revision Order has still not progressed any further. I will update the board verbally at the meeting.

Incidents

Since the last report, in addition to the tragic death of Delvin Musakwa there have been the following incidents:

These numbers are not a realistic or complete picture of incidents that happen in the waterway. We have extremely limited resources and staff to cover the area of our responsibility, and similarly we can only record either what we see or what is reported to

Incident type	Number
Sinkings	1
Groundings	1
Collisions	
Speeding vessels	33
Machinery failure	
Engine breakdown	1
Injury afloat	
Vessels adrift	2
Swimmers in the main channel	
Navigation errors	
Capsized vessels	
Man overboard	
Vessels parted from moorings	
Other	2

Grahame Forshaw

Harbour Master

1st June 2025

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STRATEGIC SCRUTINY COMMITTEE

5 June 2025

Present:

Councillor Councillor Liz Pole (Chair)

Councillors Mitchell, K, Harding, Hussain, Ketchin, Miller-Boam, Knott, Palmer, Wetenhall and Williams, M

Apologies:

Councillors Atkinson, Haigh and Rolstone

Also present:

Strategic Director for Corporate Resources, Strategic Director for Place, Legal Advisor, Head of Service - City Centre and Net Zero and Democratic Services Officer (LS)

In attendance as Portfolio Holder:

Councillors Bialyk, Vizard, Wood and Wright

1 Minutes

The minutes of the meeting held on 3 April 2025 were taken as read, approved and signed by the Chair as correct, subject to the amendment that in Minute 64 the addition of the words 'the necessity for a' were added before "15 year commitment to keep the building open".

2 Declarations of Interest

Councillor Miller-Boam declared a Disclosable Pecuniary Interest in Minute 5 Markets & Street Trading in Exeter and withdrew from the room whilst the item was heard.

3 Questions from Members of the Public Under Standing Order No.19

In accordance with Standing Order No. 19, the following question was submitted by Mr Cleasby who was present at the meeting:

"Given its aim to make Exeter a healthy city, does the Council consider it doing enough to control junk food outlets?"

The Leader, Councillor Bialyk responded as follows:

"The Council shares the concern regarding the potential impact of an over-concentration of hot food takeaway outlets on community health, particularly in areas close to schools and where healthier food options may be limited.

At present, there is no legislative basis within environmental health licensing to restrict takeaway outlets on public health grounds. However, the planning system does offer a means through which such matters can be considered.

The National Planning Policy Framework (NPPF) encourages local planning authorities to support healthy communities and specifically calls for planning policies and decisions to promote healthier lifestyles (paragraph 92). This includes ensuring access to healthier food environments.

In terms of local policy, the current Exeter Local Plan includes only one location-specific restriction on takeaway outlets (in Cathedral Yard) and does not address broader health-related impacts or proliferation citywide.

However, this is being addressed through the emerging Exeter Plan 2021–2041, which includes proposed policy wording to:

“Avoid an over-concentration of hot food takeaways, particularly along routes to schools.”

This provision is located within the ‘Healthy Communities’ section of the draft plan. This reflects growing recognition of the link between planning, food environments, and public health.

In summary, while current planning powers are limited, the emerging Exeter Plan will provide a more robust framework to manage the distribution of takeaway outlets and support public health objectives. In the meantime, planning applications are assessed case-by-case, with material consideration given to location, amenity, and cumulative impact.”

Mr Cleasby asked a supplementary question asking that the Leader look at the new report on town and Country planning which included a section on Restricting the Appeal of Junk Food in England and consider the role of Local Authorities and encourage the LGA to lobby Government. The Leader responded that he would look into this and that he would also investigate other avenues politically and that he did not believe the Government would be against this.

4 Questions from Members of the Council Under Standing Order No.20

In accordance with Standing Order No. 20, the following questions were submitted by Councillors Wetenhall in relation to the Portfolio of Councillor Bialyk who attended the meeting. The questions were circulated at the meeting to Members of the Committee. The responses of the Leader are set out below:

Question

“School Streets action by Council

On December 17th 2024, Council passed a Motion which included the resolutions to:
“1. Call on Devon County Council to work with schools and communities to increase the number of School Streets in Exeter, where schools are willing to explore this option.

2. Provide a progress report on this activity to the ECC Transport Member Working Group in six months’ time.”

Has Exeter City Council followed up the resolution by approaching Devon County Council yet and if not, when will this be done?

Can Cllr Bialyk provide an update to this committee on any action taken in relation to contacting Devon County Council since the Motion was passed and if no action taken, when he expects Executive to consider an action?”

Response from the Leader, Councillor Bialyk

“Officers from the Council’s Live and Move team are engaged with Devon County Council sustainable transport team regarding active travel and school streets in particular. DCC maintains an active school streets application process that is open to all schools and we are aware that DCC have recently commissioned a project to support a number of Exeter Schools with Travel Plan measures. We will report back

on progress and any specific school applications/projects at the next Exeter Transport Steering Group meeting.”

Supplementary Question and Response

Councillor Wetenhall asked if DCC had been formally approached in compliance with the motion and whether this had been a direct written request, by whom and when. The Leader responded that he would request information from officers but that there was no formal channel for the council to communicate with DCC but it would be good to have one and he would seek better channels of communication for district councils to bring things to the attention of DCC.

In accordance with Standing Order No. 20, the following questions were submitted by Councillors Wetenhall in relation to the Portfolio of Councillor Wood who attended the meeting. The questions were circulated at the meeting to Members of the Committee and the responses of the Portfolio Holder are set out below:

Question

“Regarding the proposed closure of Northbrook pool, actioned at the February budget council meeting, has the administration assessed the potential legal costs of a challenge under the Equality Act or other legislation, or the risk of compensatory claims from those affected?”

Response from the Portfolio Holder for leisure services and healthy living, Councillor Wood

In June, the Executive will be asked to consider a recommendation to close the pool, based on key income and expenditure data and information gathered following public consultation. This information will be included in the report along with the comprehensive EQIA.

The council is obliged to formally consult with those affected when there is a substantive potential change to the provision of a service. This legal obligation has been met.

Supplementary Question and Response

Councillor Wetenhall asked if the Council was put at risk by the EQIA not having been carried out when the closure was proposed in February? Councillor Wood responded stating that he could not comment on the law but that a decision to close had not been made when the budget was agreed and an EQIA had been carried since.

Question

If schools that currently use Northbrook Pool for swimming are forced to transfer classes to St Sidwell's Point, can the council guarantee there will be the timetable availability for those schools, and that they can bring their own swimming teachers?

Response

The potential closure of Northbrook Swimming Pool may impact vulnerable groups, such as children, the elderly, or people with disabilities. The Council has taken time to consider the impact of closure on these groups and is confident that if the Council decides to close the pool, alternative provision within our other centres can be offered, providing a suitable, safe environment.

Supplementary Question and Response

Councillor Wetenhall asked if there was availability at other pools? Councillor Wood responded in the affirmative that should a decision be made to close the pool Exeter

Leisure would ensure availability at St Sidwells Point of Riverside and that current terms and conditions would remain in place.

Question from Councillor Moore for Councillor Wood

“Given the Council occupies Northbrook swimming pool under a 99-year lease that commenced on 18th March 1996 and expires on 17th March 2095 - so there’s just under 70 years remaining. Why did the Council decline to commit to running the pool for the 15 years which would have released investment from funders?”

Response

Councillor Wood stated that Directors would respond outside of the meeting.

Supplementary Question and Response

In a supplementary question Councillor Moore asked given how long the lease was should the Council pursue grants and committee to the 15 years required? Councillor Wood responded stating that the capital costs and annual deficit would be available in a report to the Executive in the near future and that he couldn’t answer without knowing where all the funding would come from rather than one grant in isolation.

Other questions:

Councillor Palmer asked if schools would travel to Riverside to swim given the additional time and the cost of a coach? Councillor Wood responded stating that he had attended a schools festival and spoke to teachers and would look to mitigate the impact on schools.

Councillor Palmer asked a supplementary question was regular data received from Devon County Council on rates of deprivation in the city? The Strategic Director for Place advised the Member to put this in writing in order that it be properly researched. Councillor Mitchell asked that any responses be forwarded to all members of the Committee.

5 Markets & Street Trading in Exeter

Councillor Miller-Boam withdrew from the room whilst the item was heard.

The Strategic Director for Place presented the report making the following points:

- that the running of both markets was at no cost to the council; and
- Matford provided a valuable source of income.

The Strategic Directors for Place and Corporate Resources responded to Members questions in the following terms:

- Section 5 set out the differences between street trading and markets;
- there were no resources available to provide or support further markets;
- a Briefing Paper had been requested at the previous committee;
- there were no officer resources available to investigate markets further at this time;
- the Markets Team dealt with the livestock market and street licenses but it was unlikely that a team would hold information concerning private markets within the city;
- consent from the City Council was not required to hold a market on private land with no more than 4 stalls;

- Visit Exeter website held a list of current markets including the farmers market, Exeter Potters market, Matford Sunday market and car boot sale and Topsham Saturday market.

Councillor Knott stated that this had been a good discussion of the matter and that the question now be put.

The Chair proposed and Councillor Knott seconded that the Customer Focus Scrutiny Committee note the report on Markets and Street Trading in Exeter and following a vote was CARRIED.

Councillor Miller-Boam rejoined the committee.

6 Progress Report Shared Prosperity Fund - Update

The Strategic Director for Place presented the report making the following points:

- this report was a six-monthly updated as requested by the committee and would be presented in January and September 2026;
- the three year programme had ended and transition funding was concentrating on continuing existing projects, in effect providing a one year extension;
- the total award was £360,000 which was less than the three year allocation of approximately £1 million;
- grant funding had been allocated;
- the key difference were that the funds were allocated to Devon and Torbay CCA who would project manage; and
- there was an overview of proposals and funding detailed in the report.

It was noted that there was a factual error in 4.2 as the actual spend was 99.5% rather than 100% as a last-minute refund had been issued.

The Strategic Directors for Place and Corporate Resources and the Head of Service - City Centre and Net Zero responded to questions from Members in the following terms:

- Parklets had been provided through grant funding run by InExeter and where they were placed had been considered and one had been moved since which time no concerns or complaints had been received;
- there was a full appraisal framework and annual returns to Government based on their criteria which were more about the metrics set rather than success or failure.
- joint commissioning arrangements had been requested for business support and the winning company did not achieve all of their outcomes therefore not spending all of the allocated funds, which resulted in a small amount of grant funding being handed back to Government;
- some of the costs to repair broken cameras would be covered by the new transition funding;
- a review was underway of the costs of maintaining current camera stock and replacing the remaining analogue cameras with digital CCTV cameras;
- there had been two consultations on what might go into a city centre strategy, one with stakeholders and then one with Members and the next would be with the public;

- following consultation a draft city centre strategy would be written and consulted upon with a view to Council considering the strategy early in 2026. Meanwhile the city would continue to improve and bring vitality. A temporary car park would be considered but would not affect long term strategic approach to the city centre;
- the walkway between Rougemont Gardens and Northernhay had been closed for safety reasons and there were a number of areas of the city wall which required repair. Work was currently underway near the City Gate. Repair work had been out to tender twice as the first was over £1 million and the second £500,000 but had increased to £680,000 and the Assets Team were working on all sections which were at risk.

Councillor Kevin Mitchell proposed the recommendations that:

- Members note the impact of UKSPF in Exeter and the plans for transition funding for 2025-26.
- The Head of Service City Centre & Net Zero provide a further update to Strategic Scrutiny on the delivery and management of the UKSPF transition funding, the next being January and June 2026, when UKSPF has come to an end.

Councillor Knott seconded the proposal and following a unanimous vote was CARRIED.

7 **Scrutiny Annual Report**

Councillor Matthew Williams presented the report of the Scrutiny Programme Board making the following points:

- the report was now in line with the municipal year which explained why two had been presented close together;
- there was a new format for which he thanked officers for improvements which meant that the report went beyond a list of issues which had been considered and began to look at the impact of scrutiny; and
- the Scrutiny Programme Board would look to make further improvements.

During discussion Members asked questions and made the following points:

- had the suggestion to offer family membership been progressed?
- it appeared that nothing had happened with regard to active travel for those with a disability; and
- Transport Member Working Group minutes had not been received and were requested.

Councillor Williams moved the recommendations as set out in the report, seconded by Councillor K Mitchell which following a vote were CARRIED.

8 **Forward Plan of Business and Scrutiny Work Plan**

The Chair invited Councillor Moore to speak under Standing Order no. 44. Councillor Moore expressed disappointment that that Citywide work on climate change had not been given due priority but understood that the item would be heard in September and that time for scrutiny of the devolution proposal ought to be scheduled despite the vote taken at the previous meeting of the committee. In response the Chair stated that the climate item had been heard in December 2024 and would be again in

September but the Councillor could contact her should there be further issues to resolve.

The Chair stated that there was a Stagecoach item to timetable and scope and suggested that the Portfolio Holder report on what was heard at Transport Working Group. There was a discussion regarding possible Stagecoach scrutiny:

- what services Stagecoach receive public funding for;
- are there existing customer focus groups to hear views of the public directly such as Devon Bus Forum;
- to hear unheard voices including those with disabilities and those on lower incomes;
- to hear from InExeter with regard to the extent to which transport in the city was important to commercial success;

Having received officer advice, Councillor Kevin Mitchell proposed and Councillor Miller-Boam seconded a motion that the Stagecoach item be timetabled for November and the Scrutiny Programme board be asked to scope, and following a vote was CARRIED.

Following a vote the draft Scrutiny Work Plan as amended was **AGREED**.

The meeting commenced at 5.30 pm and closed at 7.11 pm

Chair

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EXECUTIVE

Thursday 19 June 2025

Present:

Councillor Bialyk (Chair)

Councillors Wright, Foale, Patrick, Vizard, Williams, R and Wood

Also present:

Councillor Haigh (as an opposition group Leader);

Councillor Holland (as an opposition group Leader);

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

Councillor Moore (as an opposition group Leader).

Apologies:

Councillor Asvachin

Also present:

Chief Executive, Strategic Director for Place, Strategic Director for Corporate Resources, Principal Development Surveyor, Head of Legal and Democratic Services & Monitoring Officer and Democratic Services Officer (LS)

44

DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

45

PENDRAGON ROAD DISPOSAL REPORT

The Leader made the following announcement:

“Thank you for attending this special executive meeting this evening; I appreciate that the notice has not been as for a regular scheduled meeting and so the fact that members have attended at such short notice demonstrates the importance of the issue before us this evening.

Members will recall that we met in July 2024 on this same issue and we were minded at that meeting not to sell access rights to facilitate the development of the adjoining privately-owned greenfield site, visible from Savoy Hill Valley Park.

Although that decision has been challenged by the land promoters of the site, the council's case has been submitted making it clear that we are confident that the decision was taken lawfully. This matter will be considered by the high court on the 18th of July 2025.

A reminder for members that a housing scheme for this site already has planning permission. Furthermore, as part of any agreement to sell our access land, should that be our decision this evening, there will be a requirement that 100% affordable housing, must be delivered on the site and that the Council will secure best consideration for the access land.

To be really clear on this point, if we are now minded to grant access by selling our land in order to facilitate the development of affordable homes, the tenure of those homes, i.e. 100% affordable homes will be secured via the legal agreement associated with any sale of our access land.

As part of any sale, the council will create additional ransom strips around the edge of the development site so that we can ensure that no further encroachment is possible in the future, without the Council's agreement.

We know that delivering affordable homes is a key priority of ALL members of this Council. While we have adopted a 'brownfield first' approach to housing to preserve our green spaces of which I am very proud, we now know that it may not be possible to deliver all the affordable homes we need this way. That is why we have to take a realistic approach, accepting the level of concern that many will feel about this, in understanding that greenfield sites, like this one, will have to continue to be a source of affordable homes in Exeter. Although, we will always be thoughtful about the loss of green space, as we know, the planning permission includes the creation of new Public Open Space.

To summarise then, as we will ensure that this site delivers 100% affordable housing in a combination of 50% social rent and 50% shared ownership, the fact that we will ensure that we create ransom strips to prevent further encroachment onto green space and the increasing challenge in the viability to delivering affordable housing of brownfield sites, I feel that it is important and the right thing to do for Executive to reconsider our previous decision not to sell our land for access to the already consented site in private ownership. After all, I feel that it would be remiss of us as Executive members to stick dogmatically to a decision made, if the circumstances have changed."

The Executive received the report which considered a revised approach that had been made to the Council to grant access over a strip of amenity land off Pendragon Road to facilitate the development of land adjoining the Council's ownership for affordable housing. The Executive were being asked to revisit the decision made in July 2024 regarding the disposal of the land in light of recent intentions to incorporate 100% affordable housing.

The Strategic Director for Corporate Resources gave a presentation as attached.

Particular reference was made to:

- the key differences between this proposal and that heard last year;
- new homes could not be delivered without this area;
- freehold would not transfer until the completion of the development;
- the small red strip seen on Slide 4 was the proposed access point;
- there was only one access point proposed therefore less land to dispose;
- there would be tenure compliance controls available; and
- A freehold ransom strip around the outside of the entire site would be sought to prevent future development via the access point discussed.

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

- clarification was sought that the license would allow access from the top of King Arthurs and Lancelot Roads;
- that the vehicular access was marked in red on Slide 5
- regarding the landowner and designation of POS, when would that legal process take place?
- how long until commencement of works and when would the land come back to the Council should works not be completed?

- would the new ransom strip license be granted to the existing landowner?
- the scheme was 100% affordable which was welcomed;
- it maybe possible to link Savoy Hill and Mincinglake Valley Parks;
- there could be a green corridor linking the Valley parks given how important wildlife and nature are;
- if the controls proposed were not agreed would it be brought back to the Executive?
- what was the meaning of Best Considerations?
- would a second or third access point be required?
- this was a strong use of green field land;
- that there was a need to balance green space with the need for homes for residents;
- further development beyond this would not be accessed this way and it was different to previous proposal; and
- outline planning consent was already in place and all sites were once green field.

Opposition group leaders raised the following points and questions:

- does the clarification given align with Appendix 1?
- it was good to see social rental;
- would all inspector conditions be enforced, in particular 10 metre route protection zones?
- what would capital receipt be spent on?
- delighted to hear a vision for a ridgetop park, this would form a small part and how would the land to the north be protected as it lay outside the local plan?;
- if this decision proceeded would the Judicial Review continue or stop? and
- what would happen if the original decision from July 2024 were kept to?

In response to questions raised, the Chief Executive, Strategic Directors for Corporate Resources and Place and Principal Development Surveyor advised that:

- it was uncertain whether there would be 1 or 2 access points required due to the scheme being at concept stage but there was the ability to draw land for access but an obligation to minimise the drawn-down to the smallest land-take possible. The red outlined area would be aimed for;
- the proposal was to provide an access licence on the full strip but endeavour to keep to the part in red;
- Drakes Meadow negotiations would likely be part of the planning process but if not could seek to secure through an additional legal agreement through the land sale;
- provisional conversations had begun about a proposal for full detailed planning but it would be difficult to put a time on this but it would not be this year but could be next year;
- the new ransom strip conditions would be issued to the developer once they had purchased the land and would form part of the license;
- there were several thousand on the housing waiting list but this proposal would create an additional 16 homes and 49 affordable shared ownership properties compared to the planning obligation for sites;
- the opportunity to link the two valley parks was not currently secured through this proposal but could be through the planning process. There would be a number of issues to tackle and would be explored;

- the proposal would target the small red part with an obligation to minimise land-take. Delegated authority was sought to finalise in consultation with the Leader and a key issue was that a second access would only be created should it be required;
- failure to adhere to terms the proposal would immediately be stopped and reported back to the Executive;
- legislation required public bodies to ensure they obtained the best consideration for property or land transactions. If this was not, as previously seen with Clifton Hill, there was a process which must be gone through. If the undervalue was in excess of £2million it would be required to seek Secretary of State approval;
- should the developer require greater access then they had the ability to request further land but the licence requests that they minimised the use of land; and
- appendix 1 showed land in blue and the proposal sought approval for the access point in red. If subsequently, through planning a second was needed the developer could come back to discuss where it was placed but would require a minimal take of land.

The Monitoring Officer clarified that the Judicial Review related to the previous decision on grounds that it was unreasonable and irrational. The Council's position that the decision was made correctly would be strongly defended when it goes to the High Court on 18 July. This was the position whether the current decision proceeds or not.

The Leader asked that the strategic Director for Place and relevant Portfolio Holder discuss with the opposition leader some of the Valley Park issues not covered.

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

RESOLVED that the Executive grant delegated authority to the Head of Commercial Assets, in consultation with the Strategic Director of Corporate Resources and the Leader, to agree the final disposal terms and red line for granting access over amenity land for the facilitation of the delivery of new affordable homes, subject to securing an independent valuation confirming the final terms represent best consideration.

(The meeting commenced at 5.30 pm and closed at 6.33 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 22 July 2025.

Pendragon Road

Executive Meeting
19 June 2025

ONE EXETER
ONE COUNCIL • ONE TEAM



Background & Chronology, including planning

- 4.9 hectares (12.1 acres) greenfield site in the Mincinglake and Whipton ward with **outline planning permission** for residential development of up to 100 dwellings.
- Including 50% as affordable housing (25% First Homes, 70% Social Rent, 5% intermediate).
- The development site is privately owned.
- 21/0020/OUT granted at appeal in August 2023.
- 22/0211/OUT granted at planning committee in September 2024.
- Executive decided not to sell the 'ransom strip' in July '24, to enable access to the site.
- Leave has been granted to judicially review the Council's decision and a Court date for 18th July has been set.



The proposal previously considered by Executive in July 2024

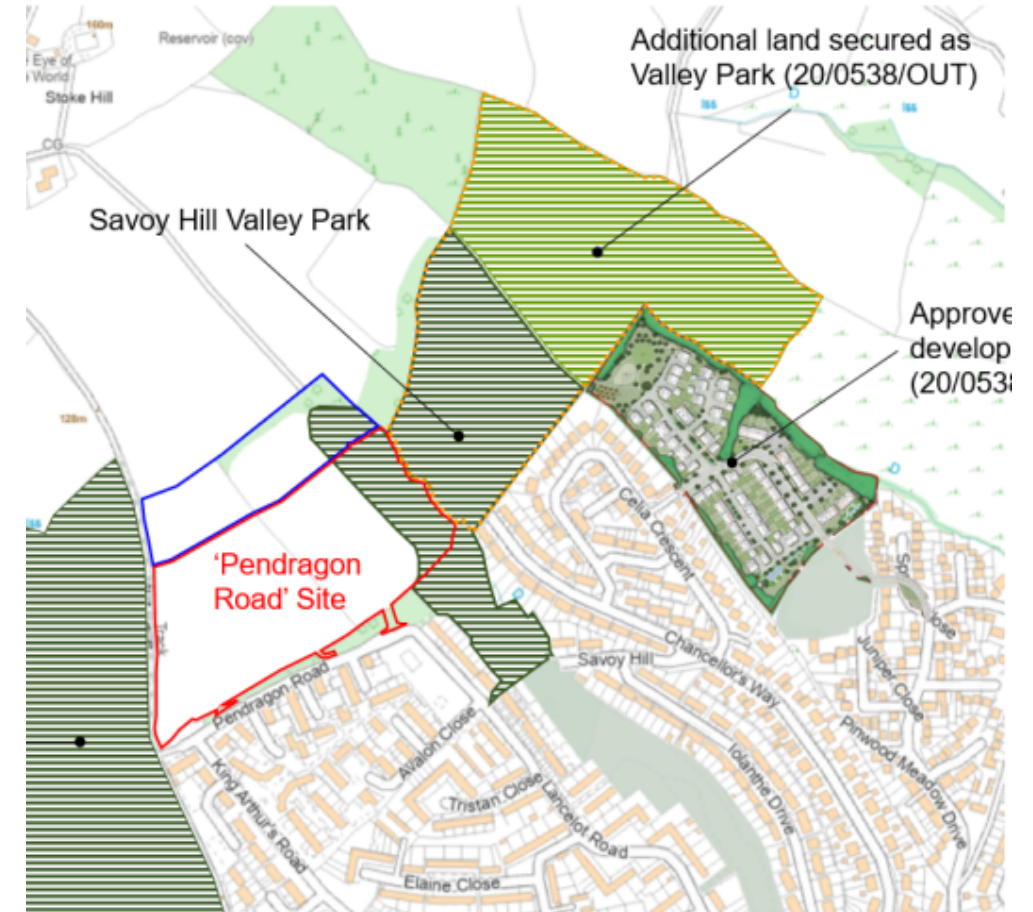
- 50% of the homes to be delivered would be affordable housing (i.e. 50 affordable homes, if 100 homes can be delivered on the site)
- The proposed tenure split within the 50% affordable homes was proposed as 70% social rented (35 homes), 25% first homes (12.5 homes) and 5% intermediate housing (2.5 homes).
- Open space elements (see slide 4).
- Financial element (see slide 5).

The Open Space

- The proposal previously considered by the Council included provision of on-site public open space (POS) and green infrastructure, and an off-site contribution towards the play area and MUGA on Pendragon Road as part of a S106 agreement.
- The planning permissions secure a minimum of 10% of the combined area (shown outlined in blue and red) as public open space, which would be transferred to a Management Company prior to occupation of the final dwelling.

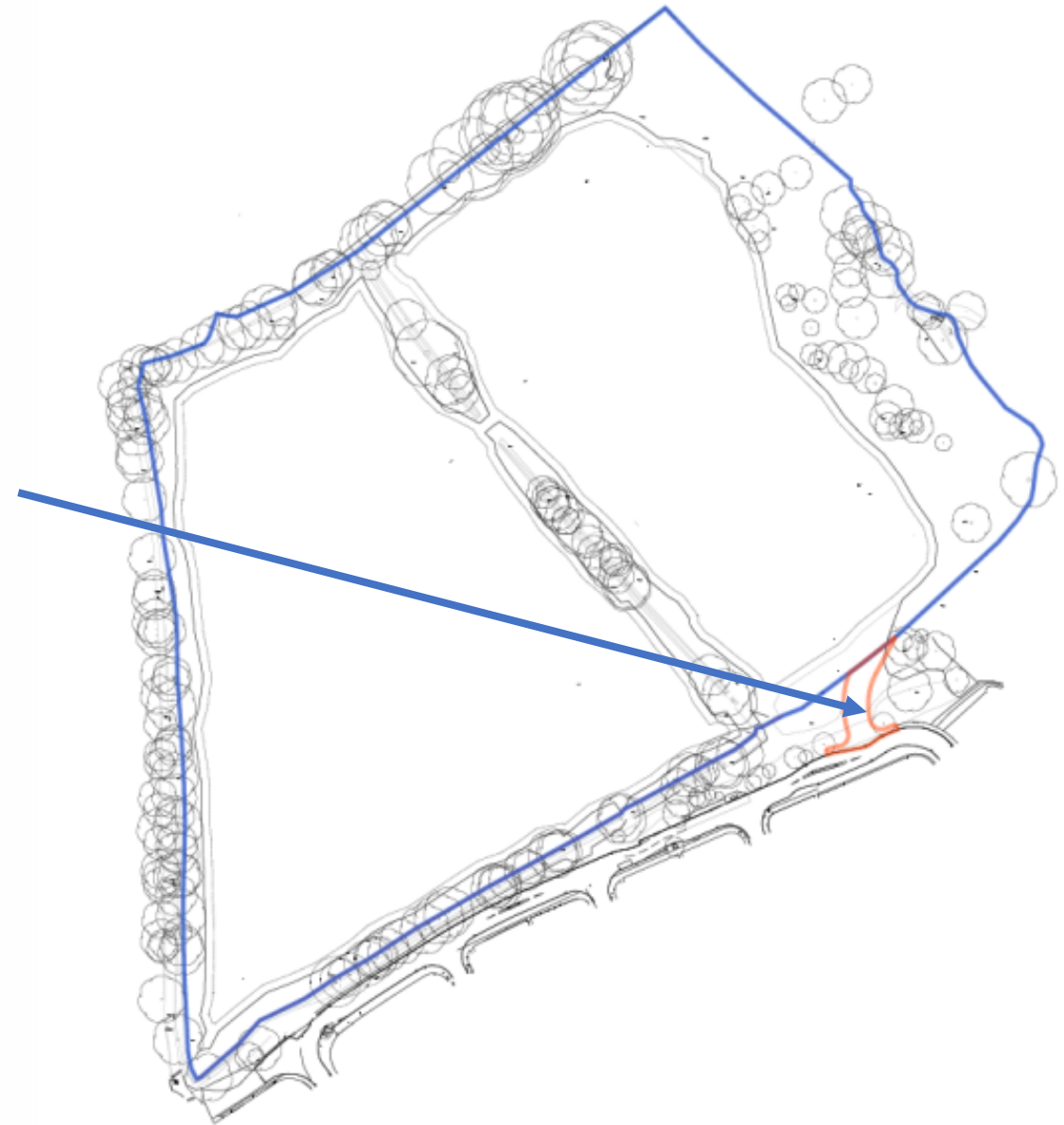
The current proposal would also fall within the S106 agreement or any variation and will also include this POS element, green infrastructure and offsite contribution towards the play area/MUGA.

- The S106 agreements do not secure the adjacent land to the site outlined in blue as public open space, which is 26% of the combined area. There would be an opportunity to formally secure the blue land as POS either through the planning process or an alternative legal agreement, as part of the new proposal.



Site Vehicular Access Licence

- ECC owns the strip of land fronting the development site and adjacent to Pendragon Road, which is needed for highway access to serve the new development.
- The new homes cannot be delivered without this access.
- Commercial position – ECC secure 33% of land uplift of development site (from £10k per acre base) – confirmed by independent surveyors as reasonable for Best Consideration.
- Based on the anticipated price for the adjoining development land the capital receipt to the Council is anticipated to be in the region of £1 million.
- This would be broadly similar in financial terms for both proposals.
- Full consideration paid on granting of Access Licence. The Freehold does not transfer until the satisfactory completion of the scheme.
- In the current proposal less land is under consideration for disposal, compared to the previous proposal.



What is the difference with the new proposal?

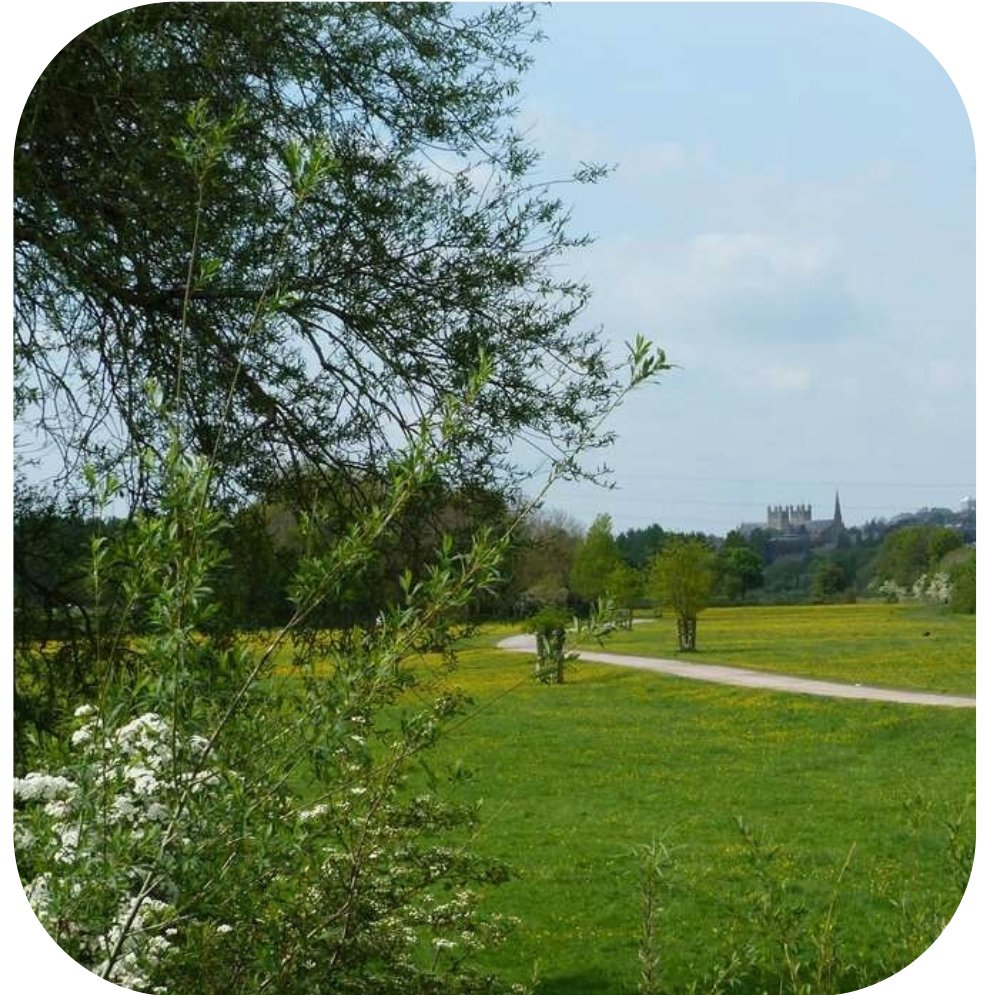
- ECC is proposing to directly contract with Vistry/Live West who will be delivering the development as a fully affordable scheme, whereas through the land agreement, ECC is introducing additional controls to ensure 100% affordable housing is delivered.
- Live West, a Registered Provider (Housing Association) with homes across the Southwest and Exeter has committed to work in partnership with ECC, Vistry and Homes England to deliver 100% affordable housing on this site.
- Live West is one of Homes England's Strategic Partners and has access to grant funding to deliver affordable homes.
- Live West has committed to using Homes England funding to deliver 51 homes for Social Rent and 49 homes for Shared Ownership, resulting in 100 affordable homes in total. This is in line with Policy H4 of the draft Exeter Plan which requires an affordable housing tenure split of social rent: 50% & affordable home ownership: 50%, for greenfield sites.

The targets and tenure split in Policy H4 are set in light of the need for affordable housing in the city identified by the 2024 Exeter Local Housing Needs Assessment (LHNA) and the viability assessment of the Exeter Plan.

- 16 additional social rented homes would be delivered, compared with the previous proposal, and there would be 49 Shared Ownership homes, which were not included in the previous proposal. Both tenures are key priorities for the Council and are understood to be the preferred mix for Homes England funding.
- This proposal is in line with ECC's strategy as set out in the emerging Exeter Plan to work proactively with Homes England and Registered Providers to leverage additional funding for affordable housing.
- Only one access is proposed which will require less land to be disposed.

Challenges in delivering affordable housing

- The Council has adopted 'brownfield first' approach to housing, as set out in the emerging Exeter Plan, which also supports priorities and outcomes in the proposed new Corporate Plan.
- Brownfield sites are not sufficiently viable to deliver all of Exeter's affordable housing needs.
- Greenfield sites, like this one, will continue to be a source of affordable homes in Exeter.
- The homes already permitted at the Pendragon Road site have been included in the underlying assumptions for the Exeter Plan and, releasing the land to enable delivery of homes on the site, will support the plan at Examination.
- There are additional benefits such as POS provision and potentially links to the two Valley Parks.



Potential Controls around Tenure and Scheme Completion

- Tenure Compliance – In the event that non-compliant tenure units are delivered (i.e. market units) during the development period ECC will have the ability to immediately restrict vehicular access (through amending the Access Licence User Provisions) allowing residents residents only until the matter is satisfactorily resolved.
- Tenure Compliance . In addition, the JV will be required to comply with the Homes England affordable housing grant funding conditions for a 100% affordable housing scheme.
- Scheme Completion – A date of 5 years from scheme commencement will be linked to the the granting of the Site Vehicular Access Licence. ECC will have the ability to acquire any undeveloped land at an appropriate value if it considers it can facilitate scheme completion. The decision to acquire will be informed by a due diligence process and a Red Book valuation.

Deal Framework - Future Development Ransom Strip

- A freehold ransom strip around the outside of the entire site will be sought by ECC to prevent any future development via the access currently being considered for disposal (without ECC's additional approval)



Homes England Grant Funding Conditions

- The Capital Funding Guide (CFG) contains the rules and procedures for all providers delivering affordable housing through one of Homes England's affordable homes programmes.
- The current proposals require Homes England funding which provides ECC with additional security around the delivery of affordable homes.
- The Council would need to agree to amend the S106 agreement to ensure that the maximum grant funding can be achieved.



Homes
England

EXECUTIVE

Tuesday 24 June 2025

Present:

Councillor Philip Bialyk (Chair)

Councillors Wright, Asvachin, Foale, Patrick, Vizard, Williams, R and Wood

Also Present:

Councillor Haigh (as an opposition group Leader);

Councillor Holland (as an opposition group Leader);

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

Councillor Moore (as an opposition group Leader).

Also Present:

Chief Executive, Strategic Director for Place, Strategic Director for Corporate Resources, Strategic Director of Operations, Strategic Director for People and Communities, Head of Culture and Leisure, Head of Legal and Democratic Services & Monitoring Officer and Democratic Services Officer(LS)

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DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

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MATTERS REFERRED BY SCRUTINY COMMITTEE

The Leader, Councillor Bialyk presented the recommendations and stated that these would be addressed within the item on the agenda.

“The Customer Focus Scrutiny Committee held on 23 June 2025 recommend that:

- the Executive discuss the possibility of community ownership with the Northbrook Trust and interested parties including community groups.
- the VAT reclaim be investigated to see how a portion might be reinvested in the future of the Northbrook Pool.”

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CLOSURE OF NORTHBROOK SWIMMING POOL

The Strategic Director for Place presented the report and gave a presentation (slides attached), making the following points:

- no decision had been taken to close the pool at the time of budget-setting, nor until full consultation and impact assessment had been carried out;
- there was a legal requirement to undertake an Equality Impact Assessment(EQIA);
- a balance must be struck between reductions in the leisure service aside maintaining the pool;
- a saving was required to maintain a legally balanced budget;
- the spend on Northbrook Pool was more than the income raised through use of the pool;
- the Building was owned by the Northbrook Community Trust and leased to the Council, with 70-years remaining;
- a significant investment in the building was necessary to bring the building up to industry standards;

- investment to reduce carbon emissions was necessary and to make the building DDA compliant;
- the financial case for works was based on estimates as quotes were not available at this time;
- the public consultation detail could be found at Appendix B. Time and effort had gone into the design of the consultation to receive rich qualitative data and understand the real life impacts;
- the EQIA could be found at Appendix C and highlighted the negative impacts on those with protected characteristics;
- a closure plan would be a technical process and would support leisure members and users (including schools) to transition to other leisure facilities, including our other two swimming pools and to utilise the portfolio of services the council had;
- the council was fortunate to have dedicated, knowledgeable staff and if necessary there would be a process to protect them utilising the organisational change process; and
- there would be a de-commissioning process which would include emptying the pool and officers would work with Members and users, including schools, and listen, support and enable them to continue at other facilities.

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

- concern for those with autism and mental health conditions was highlighted and it was asked whether groups were consulted with when SSP was designed;
- as part of mitigation could staff arrange a quiet, relaxed session for those with autism or SEND children or adults to see the other pool and have a swim as some anxiety maybe around not knowing what to expect;
- how much would it cost to bring the pool back to a state of repair in accordance with the lease in order to hand back;
- the portfolio holder, Councillor Wood stated that a good discussion had been held at the Customer Focus Scrutiny meeting and that he was proud of the leisure service with 5 large centres and one smaller one which had seen 1.8million visits over the last year and asked how many people had attended Northbrook, relative to this number;
- Northbrook represented 9% of the Council's carbon emissions and asked that the reason for decarbonisation funding having been unsuccessful or not pursued be reiterated;
- how many pools within the Exeter area were open to the public;
- Councillor Ruth Williams speaking as ward councillor for the area confirmed that she had personally put up posters and information in various newsletters which went to everyone within the ward;
- what work was done to try different hours and sessions to endeavour to improve usage of the pool;
- how did Exeter compare to other areas with regard to swimming facilities; and
- how likely would it be that Exeter would qualify for funding held within new Government announced fund of £200 million for sport and would this likely be for capital or revenue.

In response to questions raised the Strategic Director for Place and Head of Culture and Leisure advised that:

- there had been a thorough process in the project build for SSP and a multitude of groups and individual users were consulted with and were incorporated into the early project brief;
- a quiet, relaxed session could be organised and possibly a focus group with users as well as looking at different times of day;

- there were 83 registered members of Northbrook Pool and the visits represented 0.7% of the total leisure visits;
- there were changes in provision at some private organisations across the city with two primary schools about to open their pools to the public and one private organisation looking to close theirs as well as changes to the university pools. There were 6 or 7 private pools available for public use in addition to other Exeter City Council pools;
- school holidays had been targeted with a digital campaign as well as digital screens across other facilities to raise awareness of Northbrook pool and attempt to drive customers to it as well as working with schools and ward councillors;
- staff had been willing to change their hours in order to support the process of attempts to improve usage but unfortunately this had not seen an increase;
- Cornwall had closed majority of their leisure centres after the pandemic as had other local authorities;
- Exeter's had been brought back in-house for residents therefore Exeter was in a better place than neighbouring authorities, including having the first Passivhaus leisure centre, however ECC were working towards a cost-neutral leisure service; and
- guidance on Government funding was not detailed as yet but it was unlikely to be for capital and more likely for sporting events.

The Leader made the following statement:

"Colleagues, the recommendation before us this evening is to close Northbrook swimming pool.

Let me say firstly that this is not a decision we would have wanted to have to consider, and I think I can speak for all of Executive as well the ward members and I know members more widely that we have had numerous conversations and sleepless night over this.

Ideally, I would have wanted to take this decision for all members at full Council, but I have been advised by officers that this is a matter reserved for Executive.

Members though have had the opportunity to participate in the discussion at Scrutiny last night as well as engage with users and the community through our consultation.

It however falls to the Labour administration of this council via this Executive committee to consider this difficult decision.

I reflect sometimes that for all the great benefits that we have delivered and will continue to deliver in Exeter, it must be more comfortable to be in opposition where many thoughtful suggestions might be made in the knowledge that the tough decisions have to be made by others.

Our leisure service covers the whole city, and we govern for the whole city. We must do what's best for all the residents in Exeter, and not just one part of it.

The leisure service in Exeter has been on a journey for some time. We took it back in-house from a private contractor in 2020, the year that the pandemic struck, which of course had a massive impact on leisure services amongst so many others, we managed to keep going.

We have studied the report in depth, carefully considered the consultation results and had full regard to the Equality Impact Assessment.

We have also all listened to the issues raised at last night's Scrutiny Committee.

The key facts though are:

- there is low usage of the pool, compared to its high running costs,
- there is a significant capital investment needed to bring the building up to acceptable modern standards in order to make it accessible for disabled people and reduce carbon emissions both of which are essential.

The figures in the report speak for themselves as uncomfortable as they are. It would cost an estimated £2.1 million to bring the pool up to modern standards which cannot be ignored.

That's £2.1 million that would need to be found from somewhere else as well as continuing to support the pool; we simply do not have the budget for that.

Even if we accepted the ongoing heavy subsidy that we use to support the pool, it is simply not acceptable to operate a facility that does not comply with the Disability Discrimination Act or the Equality Act.

We took the service back in house because we wanted to create the best possible facilities for the people of Exeter.

When you look at the quality of the offer across the city and the membership we have, we have indeed been successful.

We've invested heavily in the leisure service - and will continue to do so - because health and wellbeing of all residents in Exeter is a key priority.

I remind you of the facilities we have at the Arena, close by, also plans for Wonford which are still not funded at this time. These are important things that we need to do for the health and wellbeing of the people of our city.

We also know that swimming is an important part of the national curriculum, and we will continue to work with local schools to ensure that we provide our children with a safe and welcoming environment in our other two pools, so they can continue their swimming lessons.

I am very proud of the fact that in 2024 more than 2,500 young children learnt to swim at St Sidwell's Point and more than 2,000 young children learnt to swim at Riverside. 4500 across the city in one year.

The city will continue to be served by two fantastic publicly owned swimming pools which have received heavy investment to ensure they have long-term viability. This is something we are simply not just able to do at Northbrook. As the report highlights, since 2020 we have provided £686,130.99 subsidy.

We have carried out extensive promotional and marketing campaigns, but despite best efforts of all people including councillors and local people, usage has remained low, and this has been the case for a long time.

This year councillors were asked to identify £3.5 million savings to set a balanced budget.

The need for savings from the leisure service was identified, and officers began a major consultation to assess the impact of the potential closure of Northbrook.

The consultation was extremely thorough, and I have looked carefully at the results which are highlighted in detail in the report.

We have carried out an impact assessment and I fully understand that some vulnerable people, including those with protected characteristics will be impacted by this decision, and of course we all regret this and do everything we can to mitigate. If Executive decides to close Northbrook Pool this evening, our officers will work hard to ensure that all barriers to people accessing our other facilities are removed, wherever it is possible to do so.

If agreed tonight, the closure process could take up to 12-weeks. This will give officers time set up focus groups, talk with teachers and engage leisure members to work out ways to help people transition to St Sidwell's and Riverside pools. We are fortunate in having committed and knowledgeable staff at our leisure centres, who can facilitate this process.

I have noted one of the recommendations which was proposed by Councillor Parkhouse and agreed at last night's Scrutiny Committee, that the Executive discuss the possibility of community ownership with the Northbrook Trust and interested parties including community groups.

Should the Executive decide to close Northbrook Swimming Pool this evening, I would like to propose adding this additional recommendation, by asking officers to reach out to the Trust who own the facility and for those discussions, together with local stakeholders.

The additional recommendation would read:

"This council is committed to assisting in the facilitation of this. But of course, it would be a matter for any group coming forward and we will support where we can." I would also like to propose an amendment to the second recommendation to indicate that the decision will be delegated to the Strategic Director in consultation with the Portfolio Holder, which is myself.

On the second recommendation from Scrutiny related to the use of a VAT refund; this refund is being held in order to protect the council's financial position in the situation where the council may be approached to make a refund. I cannot place fast and loose with the finances of the Council at this stage.

This issue will be further explored in setting the budget for next year in which all members are involved.

I stress again, the Council has a duty to do what's best for the whole city with the resources available and as difficult as it is, I will be accepting, with a great deal of regret, the recommendation to close the pool."

During further discussion, Members of the Executive Committee made the following points:

- that this was a very difficult decision;
- there was conflicting information in circulation making it difficult for residents;
- Northbrook had served the city well for any years;
- if there were unlimited funds available Northbrook would remain and add one in every ward but money was extremely tight with savings to be made;
- each centre and their sustainability had been looked at;
- it was of note that a wheelchair-using male could not access Northbrook at all and those with accessibility needs did not have a dignified way to use the pool;
- Members had visited the pool;

- community spirit had grown around the use of the pool and a group now met in the Isca centre;
- levels of pools usage had been calculated by Swim England;
- There appeared four issues – potential staff redundancies, schools, SEND and subsidies;
- the building was not able to accommodate those with disabilities well;
- efforts would be made to include the five schools within the timetable at SSP;
- no-one wanted to close swimming pools but there could be an opportunity for the passionate community to look into the running of the facility;
- the special scrutiny meeting had been welcomed as it had allowed the gathering of more information to support the decision;
- more people could be impacted should a decision be taken not to close Northbrook;
- personal stories had been captured at focus groups and additional needs could be addressed at other existing pools; and
- usage was too low to sustain the pool.

All Members of the Executive thanked the petitioners for the amount of effort and work they had put into the campaign and welcomed hearing from them.

The Head of Culture and Leisure clarified that the figure of 1.8 million was visits to leisure facilities rather than individual people. Children with education needs were able to be given a better experience at centres other than Northbrook.

Opposition group leaders made and raised the following questions and points:

- the financial pressures were recognised;
- asked for support for the amendment and that the community be given the opportunity to bring forward a charitable model;
- was there a financial penalty for ending the lease;
- that it be formally noted that there was a duty of care to support officers who must bring difficult decisions before Members and a culture must be fostered where officers feel safe within and outside the Council;
- hope that there were lessons which could be learnt from this process;
- disappointed that community asset transfer had not been considered;
- what other parts of leisure would be impacted as it appeared that £586,000 would not be saved; and
- what were the arrangements for reporting back following discussions with community groups.

The Leader responded stating that further investigation would be needed regarding VAT and that an ear-marked reserve would be a matter for Council. He stated that he would meet with Directors to keep up to date with discussions regarding the potential future of the pool.

The Leader asked that Members of the Executive Committee consider the points raised by the opposition leaders.

A short break was taken at 7.30pm and the meeting reconvened at 7:36pm.

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

Agreed:

RESOLVED that:

1. the Executive agrees to the of closure of Northbrook Swimming Pool, based on the consideration of key income and expenditure reports, information gathered following public consultation and the Equalities Impact Assessment (EQIA).
2. the Executive delegates authority to the Strategic Director for Place, in consultation with the Leader to undertake the closure of the facility.
3. that support is provided to existing members and users, including local schools, in transitioning to alternative Exeter Leisure facilities.
4. any increase in costs to the Leisure Services to be reported back to the Executive and Council for approval.
5. as recommended by Scrutiny, Executive asks officers to facilitate a discussion with the Northbrook Trust and interested parties, including community groups, on the possibility of community ownership.

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PARKING PLACES ORDER

The Executive received the report which sought to make amendments under the Parking Places Order to improve the regulation of Council car parks and to support the aims of reducing traffic congestion.

Reference was made to:

- the proposal being to begin consultation on the amendments to the Parking Places Order which would take place in line with statutory requirements which maybe short than, but would comply with the Consultation Charter;
- £75,000 income was being requested but this was a Council function; and
- Should the proposal be agreed this would incorporated into the budget monitoring.

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

- Would this come back to the Executive for approval;
- Last year a decision had been made having listened to the public;
- What type of carbon reduction measure were there surrounding car parking;
- A typographical error in the recommendation was pointed out; and
- Would there be tracking to determine whether there had been higher footfall within the city centre as a result.

In response to questions raised the Strategic Director for Corporate Resources advised that:

- The proposal was seeking delegated authority so there would be no need to come before the Executive again, if approved;
- Detailed carbon reduction measures would be provided;
- The typographical error would be corrected;
- The new Head of Service had ideas and was actively exploring ways to reduce ASB;
- If the proposals were adopted following consultation then a recommendation would be made to Council; and
- It was early days since the introduction of the reduced Sunday charge but tracking was undertaken and would be monitored.

Opposition group leaders made and raised the following questions and points:

- Was the policy to pursue car parking charges maximising income;
- How would this proposal reduce emissions in the city;
- If charges increased further, would people shop from home more or go where there is no charge;
- It was good that the cost of Ringgo would be passed to users;
- Car parks were the largest income stream, was this as large as council tax; and
- They would not wish to deter footfall into the city.

In response to the opposition leaders comments the Leader reminded Members that a year ago charges had not been increased regardless of this being a substantial revenue stream and that he would talk to Directors about the policy.

The Strategic Director for Corporate Resources stated that there was a responsibility to keep traffic moving in the city and that increasing charges may act as a deterrent meaning some people may consider alternative forms of transport. Car Parking charges were the single largest income stream and there was a balance to be struck in support everyone, including the local economy.

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

Agreed:

RESOLVED to:

1. amend the Car Park Places Order 2014 as follows:
 - a) Increase car parking charges at all car parks as detailed in 8.2 of the report;
 - b) To pass the transaction charge for using the Ringgo App to the user;
 - c) To move the following car parks from Zone 1 to Central Zone
 - a. Howell Road;
 - b. Triangle;
 - d) £75,000 of the income achieved from Car Parks to be set aside for maintenance, improvements and carbon reduction measures to city centre car parks.
2. delegate authority to consider the responses to the consultation and determine whether to implement the Order (or parts thereof) to the Head of Service Commercial Assets in consultation with the Strategic Director Corporate Resources and Leader of the Council.

(The meeting commenced at 5.30 pm and closed at 7.52 pm)

Chair

Northbrook Swimming Pool

Presentation to Executive
24 June 2025

Recommendations

1. *The Executive agrees to the of closure of Northbrook Swimming Pool, based on the consideration of key income and expenditure reports, information gathered following public consultation and the Equalities Impact Assessment (EQIA).*
2. *The Executive delegates authority to the Strategic Director for Place to undertake the closure of the facility.*
3. *That support is provided to existing members and users, including local schools, in transitioning to alternative Exeter Leisure facilities.*
4. *Any increase in costs to the Leisure Services to be reported back to the Executive and Council for approval.*

Brief chronology

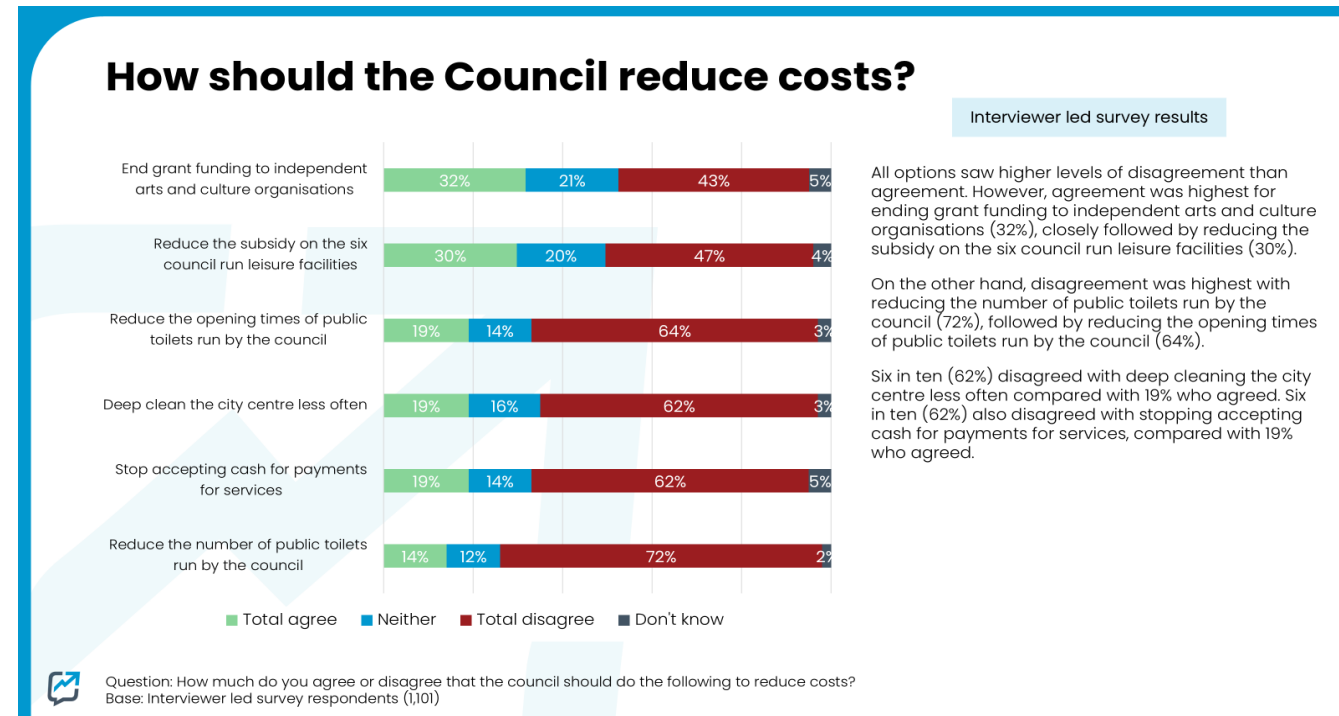
- In 2020 ECC brought back Leisure Service in-house, including Northbrook Swimming Pool.
- Between July 2022 - Jan 2024 13 separate marketing campaigns to boost attendance figures.
- Usage and revenue figures have seen little improvement.
- December 2024 to January 2025 resident survey on budget setting.
- On 25 February 2025, the Council set a balanced budget.
- **No decision was made to close Northbrook Swimming pool.**

Key information on which officers have based their recommendations on

1. Accurate financial data on usage & running costs: Despite targeted efforts to increase footfall and income since the Council brought Northbrook Pool back in-house in 2020, the pool continues to operate at a substantial loss and so far, has required £686,130.99 in subsidy to keep the pool open.
2. Estimates of the capital investment needed continue to make the building safe, accessible for people with disabilities and more energy efficient amount to approximately £2.1million.
3. The results of an open public consultation which lasted 6-weeks, including surveys, pool user focus groups, and follow-up telephone conversations. The consultation generated important qualitative information, on how a potential closure might impact on people's lives.
4. An EQIA has provided a comprehensive understanding of the potential impact of a closure of this pool on users with protected characteristics, whilst also setting out suggestions on how to mitigate the impacts.

Consultation on the budget

- Between December 2024 and January 2025, the Council conducted a resident survey as part of its budget setting consultation.
- Residents were asked to state to what extent they agreed/disagreed with a series of statements on service areas the Council was considering investing or disinvesting in.
- In response to the question “How could the Council reduce costs?” all 6 options saw higher levels of disagreement than agreement.
- However, agreement was highest for ending grant funding to independent arts and culture organisations (32%) **closely followed by reducing the subsidy on council run leisure facilities (30%).**



Consultation on the budget

- On further analysis the data showed that there was higher agreement on reducing the subsidy on the six council run leisure facilities amongst those aged 65 or over, females, non-white ethnic groups and Exeter City Council housing tenants.
- There was higher disagreement from younger people aged 24-44, males, those from a white ethnic background and those who did not have a disability or long-term condition and those living in areas of lower deprivation.

Variations by subgroups

Interviewer led survey results	Higher agreement	Higher disagreement
Reduce the subsidy on the six council run leisure facilities	Those aged 65+ Females Non-white ethnic minority groups Exeter City Council housing services tenants	Those aged 25-44 Males Those from a White ethnic background Those who did not have a disability or long-term condition Those in areas of lower deprivation
Reduce the number of public toilets run by the council	No differences	Those aged 45+ Those living in the North area Those from a White ethnic background Those who had a disability or long-term condition
Reduce the opening times of public toilets run by the council	Those aged 45+ Those in the South area	Those aged 25-44 Those in the North and Central areas Those who were not Exeter City Council housing services tenants
Deep clean the city centre less often	Those aged 65+ Those in the South area Those who had a disability or long-term condition	Those aged 16-24 Those living in the North area
Stop accepting cash for payments for services	Those in the South and Central areas	Those in the North area Those from a White ethnic background Those in areas of lower deprivation
End grant funding to independent arts and culture organisations	Those aged 25+ Males Those in the South area Those who had a disability or long-term condition	Those aged 16-24 Females Those in areas of neither higher nor lower deprivation



Question: How much do you agree or disagree that the council should do the following to reduce costs?
Base: Interviewer led survey respondents (1,101)

2

Council budget for 2025/26

- On 25 February 2025, the Council set a balanced budget.
- Members advised that they needed to identify £3.5 million savings.
- This included a reduction to the budget of the Leisure Service of £586,000.
- In response Leisure Service has reviewed the centres it runs.
- One of the potential savings is Northbrook Swimming Pool.
- Staff were informed, but it was also made clear that no decision would be made to close Northbrook Swimming pool, until a consultation and impact assessment was completed.

The Financial Case

	Amount (£)
Membership Revenue	105,798.56
Casual User Revenue	34,446.51
Block Booking/Club Revenue	59,913.06
General Maintenance and Repairs Costs	66,845.12
Operational Costs	819,444.00
Total Subsidy	686,130.99
Carbon Emission Reduction Quoted Cost	850,000.00
Upgrading to Industry Standards Quoted Cost	700,000.00
Compliance with the Disability Discrimination Act (DDA) Quoted Cost	550,000.00
Total anticipated capital expenditure	2,100,000

Public consultation

- 6-week open public consultation from 11th March to 22nd April 2025.
- Full details in the Consultation Report (Appendix 2).
- 322 respondents completed the survey and the four focus groups were attended by 35 people.
- 30 individual telephone calls.
- Monitoring social media.
- It was clear that if the pool closes, it will have real-world impacts on many users.
- Older people, school children, carers, the elderly and lower income families are likely to be most impacted by a closure.

Equalities Impact Assessment (EQIA)

- The Council has undertaken a thorough and comprehensive EQIA, which is attached to the report as Appendix C.
- Members should have due regard to both the consultation results and the impact assessment, before deciding.
- The assessment highlights that the proposed closure of Northbrook Pool does have a negative impact on people with protected characteristics, specifically in relation to disability, sex and age.
- The assessment also highlighted that people with mental health conditions or those with neurodivergence would be impacted.
- Should the Council decide to close Northbrook Swimming Pool, officers will take steps to mitigate the impacts.

Next steps

- If the Council decide to close the pool; officers will design and implement a Closure Plan.
- The process is likely to take at least 12-weeks.
- The plan will include:
 - Giving notice to the Northbrook Community Trust
 - Notifying leisure members and staff
 - Working with staff as part of the Council`s organisational change process
 - Ensuring all the technical requirements in de-commissioning a swimming pool, are carried out
 - Dealing with any contractual issues concerning the building and services.
 - Return the building to the Northbrook Community Trust, in repair and in accordance with the lease obligations.
- Officers will also review existing class & club bookings and transfer as many as possible to our other two pools.
- Officers will also work with leisure members, users of Northbrook Swimming Pool and schools to help them transition to other facilities.

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EXECUTIVE

Tuesday 8 July 2025

Present:

Councillor Bialyk (Chair)

Councillors Wright, Asvachin, Foale, Patrick, Vizard, Williams, R and Wood

Also present:

Councillor Haigh (as an opposition group Leader)

Councillor Holland (as an opposition group Leader)

Councillor M. Mitchell (as an opposition group Leader)

Councillor Moore (as an opposition group Leader)

Also present:

Chief Executive, Strategic Director for Place, Strategic Director for Corporate Resources, Strategic Director of Operations, Strategic Director for People and Communities, Legal Advisor, Place Partnership (Sport England) Manager, Head of Service - Customers and Communities, Head of Service - City Centre and Net Zero, Net Zero Project Manager and Democratic Services Officer (LS)

50

MINUTES

The minutes of the meeting held on 20 May 2025, were taken as read, approved and signed by the Chair as a correct record.

51

DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

52

QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

There were no questions from the public.

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MATTERS REFERRED BY SCRUTINY COMMITTEES

The Customer Focus Scrutiny Committee held on 3 July 2025 recommended that:

- the Executive send findings from work on Box-shifting to Government to consider as part of their review.

The Executive agreed to send findings from the work on Box-Shifting to the Government to consider as part of their review.

54

CORPORATE PLAN REPORT

The Executive received the report delivered by the Chief Executive which sought Members' agreement to the draft Exeter City Council Corporate Plan for 2025 to 2028.

Particular reference was made to:

- the good timing of the report and the assistance in ensuring focus on Member's key priorities whilst developing the proposal for unitary status;
- the clarity provided for staff and stakeholders on priorities and outcomes;
- each service area would be developing their service plans and risk registers based on these priorities;
- a corporate performance framework would be developed to develop and report progress in achieving those priorities; and
- feedback provided by residents and stakeholders during the Corporate Plan consultations had been reflected in the report where possible.

The Head of Service Customer and Communities presented the consultation work that had fed into the Corporate Plan. The key points made were:

- the surveys highlighted key milestones in our consultation;
- insights fed into workshops with SMB that had helped shape the Corporate Plan;
- there had been over 2800 responses from the resident's survey, and the budget and corporate priorities consultation;
- there were concerns about safety at night;
- 77% were backing construction of new council homes;
- emphasis was placed on the importance of being kept informed;
- community and stakeholder engagement played a key role; and
- there was a continued commitment to listening with the next round of surveys beginning soon.

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

- 'carbon neutral city' should be replaced with 'net neutral city', as language and consistency were important;
- the report supported cross-service working by looking at outcomes, rather than service-delivery;
- both statutory and discretionary services were detailed within the report;
- the plan would be able to help us balance the needs of the city, what needs to be achieved, and what the residents want;
- measures and metrics of a well-run council are highlighted in the plan, how would the monitoring for that be communicated?
- Only 59% of residents felt safe after dark, hopefully work with community safety partnership would help change this;
- DCC would be approached regarding lighting, and this would give data that can be used when approaching them; and
- Net Zero received the most critical feedback and we need to hear them and make sure we were communicating positively about the environment with residents.

Opposition group leaders raised the following points and questions:

Councillor Moore was disappointed that the Leader had not reached out to other groups to collect their views, and that the views they had sent in had not been reported in the Corporate Plan. Councillor Moore asked for clarity regarding the nature outcome and hoped this would be addressed.

Councillor Mitchell praised the Corporate Plan and thought the aims were great. Raised concerns about the limited mention of the University of Exeter, and no one under 25 had taken place in the consultation.

In response to questions raised, the Strategic Director for People advised that:

- detailed work had been undertaken with directors and heads of service to identify suitable measures for the outcome metrics in the plan;
- user-acceptance testing for corporate performance framework draws data from a range of sources;
- testing would be able to be reported back and shared with other authorities;
- this was a complicated piece of work and the work that was being done was fantastic;
- all staff would be able to see how the work they do is related to the corporate plan;
- there would be a new dashboard that would enable tracking of objectives;
- clarity from Members about what was most important had helped shape this development;
- surveys used targeted market research, either over the telephone or face-to-face;
- residents survey launching this week was very important as it would be more inclusive of people of all ages, and it was valuable to compare this with data collected from individuals that completed survey themselves; and
- the University were invited to comment, and it was disappointing to receive so few responses from stakeholders

The Leader moved the recommendations and Councillor Wright seconded, were voted upon and CARRIED unanimously.

Agreed:

RECOMMENDED that Council:

- (1) approves the Exeter City Council Corporate Plan 2025-2028 and endorses the strategic priorities and intended outcomes identified in the plan; and
- (2) note the findings from the consultation report and previous surveys.

RESOLVED:

- (1) that Executive note the findings from the consultation report and previous surveys; and
- (2) that any necessary drafting amendments before publication be delegated to the Chief Executive, in consultation with the Leader of the Council.

LOCAL DEVELOPMENT SCHEME: SUMMER 2025

The Executive received the report which referred to an updated Local Development Scheme (LDS) which identified a brief scope and timetable for the preparation of Council planning policy documents including the emerging Exeter Plan (the new Local Plan).

Particular reference was made to:

- the LDS being a legal requirement outlining planning policy documents, including the Exeter Plan;

- the need for a new update to reflect the later timescale for the Exeter Plan, which had been programmed for September; and
- work on St Luke's Campus being brought forward as a supplementary planning document (SPD).

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

- would going ahead with this plan prevent us from submitting any SPDs at a later date?

Councillor Moore as opposition group leader raised the following points and questions:

- was the Portfolio Holder for City Development planning to bring forward a policy on co-living?

In response to questions raised, the Strategic Director for Place advised that:

- any policy in an adopted plan could have an SPD brought forward;
- he had been in touch with the chief planner at Bristol City Council and would be happy to share their draft on co-living with Members; and
- attracting investment in Exeter regarding co-living was complex so it would be worth obtaining more detailed guidance on the issue.

The Leader moved the recommendations and Councillor Wright seconded, were voted upon and CARRIED unanimously.

Agreed:

RESOLVED That Executive approves the updated Local Development Scheme (Appendix A) as the basis for preparing local planning policy.

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NEWTOWN COMMUNITY PROJECT – TRIANGLE CAR PARK AMENDS

The Executive received the report which sought approval to improve walking and cycling infrastructure in Newtown, as well as changes to the Triangle Car Park.

Particular reference was made to:

- changes to the car park would be considered by Highways and Traffic Orders Committee (HATOC) on the 15 July;
- much consultation and engagement had been carried out and it was evident that this was wanted by the local community;
- the improvements would make it easier and prevent unnecessary cars travelling through the area;
- one street would be closed but it would improve the nature of the area;
- the changes would see a loss of 28 useable parking spaces, but there would be a dedicated walkway which would improve the car park;
- five new disabled spaces, and parent and child spaces would be created; and
- this was a good example of a public sector led partnership which had been carried out over a number of years.

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

- this would have real benefits for the community and would encourage the use of Belmont Park;
- closing Russell Street would help and it had had little use typically;

- the cycling campaign had provided great support;
- this was a great example of a community led project;
- the modest loss of parking spaces would be offset by other projects and the impact on residents and visitors outweighed the loss of car parking spaces;
- it was important to balance healthy living and getting about safely whilst also considering traders and car parking;
- 19 of the 28 spaces being lost were unusable due to tree roots; and
- the provision of disabled and parent and child parking was much needed.

Opposition group leaders raised the following points and questions:

- Cllr Holland warmly welcomed the project but was concerned about the loss of spaces and asked when the old bus station would be adopted as car parking; and
- Cllr Haigh raised concerns about the accessibility of the site and enquired as to why feedback from Guide Dogs had been ignored. She highlighted the lack of raised borders, confusing paths, and no tactile paving.

The Leader responded to Councillor Holland by saying he would speak with officers regarding the timeline for the development of the bus station and would let all councillors know.

In response to Councillor Haigh, the Leader stated that he would check that the plans were following Disability Discrimination Act 1995 (DDA).

The Leader requested advice of the Deputy Monitoring Officer regarding the three Executive Members who also sat on HATOC. The Deputy Monitoring Officer clarified that there would be no issue with voting on this matter.

In response to questions raised, the Strategic Director for Place advised that:

- there would be scope for minor landscaping and signage improvements to be carried out as a general upgrade to the highway; and
- the council were not contravening any DDA guidance as they were not proposing any changes to Western Way.

The Leader moved the recommendations and Councillor Wright seconded, were voted upon and CARRIED unanimously.

Agreed:

RESOLVED that the Executive approve a new layout, including walking & cycling infrastructure to the Triangle Car Park, resulting in a loss of 28 useable spaces.

RECOMMENDED that the Devon County Council Highways and Traffic Orders Committee (HATOC) be requested to consider these proposals concerning the Newtown Walking & Infrastructure Project at its meeting on 15th July 2025 with a view to implementation of the scheme.

The Executive received the report presenting a summary of the “Costed Organisational Carbon Footprint Projections to 2030”, study carried out by the University of Exeter.

Particular reference was made to:

- that this had been a truly groundbreaking study, and had been able to highlight the true cost of decarbonising put services;
- the report considered three scenarios- business as usual (BAU), Mid-term and Max-term net zero;
- scope 1 and 2 emissions were direct emissions such as fleet vehicles, and indirect emissions such as when buying electricity;
- business as usual were measures that were already being taken or committed to, to reduce carbon emissions. Retrofit within Council Housing was given as an example;
- the mid and max terms required much larger reductions to be considered. New technologies would be required for homes. Fundamentally it would be switching from gas to electric, this would cause energy prices to go up;
- most mid and max measures were unaffordable currently;
- the next stage would be to understand how the council could explore additional BAU measures;
- BAU would be challenging, and additional funding would be required; and
- to escalate to mid and max, significant capital investment would be needed.

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

- the Council were very lucky to have this incredible knowledge on their doorstep;
- BAU was a misnomer and suggested that nothing was being done which was not the case;
- integration across the council was needed;
- the opportunity for scrutiny to look at this report in September was welcomed;
- the report was extremely useful to be able to refer to and provided a sounding board;
- would the next report go into the detail of service-led prioritisation?
- BAU was dismissive of the amount of work which had been carried out by officers;
- Exeter had the first Passivhaus swimming pool in the country;
- could officers provide more information about decarbonisation of the national supply?
- carbon footprint could indicate running cost, and the cost of running a swimming pool was high, how can we decrease?
- it was incredibly difficult to retrofit and bring down the carbon footprint of a building such as the RAMM;
- the Leader was interested to know if the report should have provided more information on investment in trees.

Councillor Moore as an opposition group leader raised the following points and questions:

- she hoped government would be lobbied for funding to undertake this work;
- would the next report set out the savings to the council in terms of the return on the investment being made?
- would there be benefits for taxpayers and residents as bills to the Council would decrease?
- when looking to continue BAU route, there were many areas which either did not show reductions or they were minimal by 2030;
- if BAU was pursued, when would reductions in carbon emissions be evident? and
- would the Executive include investment in nature as one of their priorities?

In response to questions raised, the Strategic Director for Place and the Net Zero Project Manager advised that:

- the next report would cover in detail the service-led prioritisation;
- there were a range of things which could be done under BAU, such as building more council houses, if these were built to a certain standard it would reduce the carbon footprint;
- St Sidwell's Point was a groundbreaking project, but it was a large building and did consume a lot of energy;
- there was an aspiration to add Solar PV at the site; and
- at Riverside a large amount of emissions were from the gas heating and the swimming pool which the heat pumps would remove and therefore show a huge improvement;
- trees related to sequestering or off-setting carbon emissions.

The Leader moved the recommendations and Councillor Wright seconded, were voted upon and CARRIED.

Agreed:

RESOLVED that

- (3) The Carbon Footprint Projections, study including associated challenges and cost to the City Council, are noted and this information will be reported to Strategic Scrutiny Committee in September 2025.
- (4) Members note progress to date and further carbon reduction potential under the assessment of Scope 1 and 2 carbon reduction scenarios available to achieve net zero.
- (5) A further report is considered by Executive, which identifies options for how Business as Usual (BAU) carbon reduction measures can be incorporated into annual Service Plans, to enable prioritisation of service led GHG emission reduction measures.
- (6) The Net Zero team works in collaboration with relevant Services to plan future funding bids to secure additional resources, prioritising social housing, buildings and transport services to support emission reductions.

Particular reference was made to:

- this being a successful partnership between Exeter City Council, East Devon District Council, and Teignbridge District Council to protect the Exe Estuary, East Devon Pebblebed Heaths, and Dawlish Warren;
- the new strategy would cover the period from 2025 to 2030 and would introduce a range of measures to protect these areas;
- it would be funded through CIL due to the direct impact from housing developments on these environments; and

- the report had been produced jointly by officers across the three districts and the same report had been presented to all three districts.

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

- this strategy would enable key developments to progress and would assist ECC with meeting housing targets;
- can the Director provide an understanding of how ECC interests would be protected when creating and managing any new Suitable Alternative Natural Greenspaces (SANGs), as well as planning and delivering strategic access management and monitoring projects such as the potential new SANG in Whipton/ Beacon Heath area and how that collaboration would work?
- this partnership had been held up by Natural England as an exemplar;
- the two partner councils had already passed this strategy; and
- where CIL wasn't chargeable, a contribution could be made through section 106.

In response to questions raised, the Strategic Director for Place advised that:

- SANGs were used to deflect people away from the important greenspaces by providing an alternative option for recreational purposes;
- a joint approach had to be taken due to the strategic nature;
- there was a joint committee called Habit Mitigation Executive Committee and Councillor Williams was our representative on it; and
- work was being done to look at Valley Parks for SANGs but also biodiversity net gain.

The Leader moved the recommendation and Councillor Wright seconded, were voted upon and CARRIED unanimously.

Agreed:

RECOMMENDED that Council approves the adoption of the Southeast Devon Wildlife Joint Habitats Sites Mitigation Strategy 2025 – 2030 attached at Appendix A.

(The meeting commenced at 5.30 pm and closed at 7.05 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 22 July 2025.

REPORT TO EXECUTIVE

Date of Meeting: 8th July 2025

REPORT TO COUNCIL

Date of Meeting: 22nd July 2025

Report of: Chief Executive

Title: Draft Corporate Plan 2025-2028

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive to recommend to Council

1. What is the report about?

1.1 This report seeks members' agreement to the draft Exeter City Council Corporate Plan ('The draft Plan') 2025-2028. The Plan outlines the key priorities and strategic outcomes for the next three years, focusing on the 4 priorities of Local Economy, Homes, People, and Sustainable Environment, underpinned by a Well-Run Council.

The report also presents the outcome of the corporate plan consultations, which includes feedback from residents and stakeholders.

2. Recommendations:

2.1 That Executive recommends that Council approves the Exeter City Council Corporate Plan 2025-2028 and endorses the strategic priorities and intended outcomes identified in the plan;

2.2 That Executive and Council note the findings from the consultation report and previous surveys; and

2.3 That any necessary drafting amendments before publication be delegated to the Chief Executive, in consultation with the Leader of the Council.

3. Reasons for the recommendation:

3.1 The draft Plan represents the council's business plan, confirms the strategic priorities of the council and sets out the priorities for delivering those strategic priorities within available resources. The draft Plan aligns with the aspirations of the Exeter Vision 2040.

3.2 The priorities within the draft Plan have been subject to extensive consultation to ensure as much as possible that residents, members and other stakeholders were given the opportunity to understand and comment on the draft priorities.

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

4.1 The implementation of the new Corporate Plan 2025-2028 will require collaboration across the Council and through on-going engagement with residents and partners. Financial resources will be allocated to support the delivery of strategic priorities outlined in the plan, and these will be identified within the annual budget setting process and delivery of key outputs and outcomes will be monitored through a new corporate priorities performance management system.

5. Section 151 Officer comments:

5.1 The Corporate Plan, if approved, will be linked to the Council's medium term financial plan to assist members in understanding where they are prioritising their spend. The adoption of the plan itself does not commit Council to any additional funding.

6. What are the legal aspects?

6.1 There is no specific legal obligation for local authorities to publish a corporate plan. However, they are considered to be good practice and demonstrate effective governance. They are widely used by local authorities as a strategic management tool to set out a council's vision, priorities and objectives.

6.2 The main statutory duty that relates to corporate plans is the Best Value Duty which was introduced by the Local Government Act 1999. This requires local authorities to secure continuous improvement in how they carry out their functions '...having regard to a combination of economy, efficiency and effectiveness'.

7. Monitoring Officer's comments:

7.1 Members will note the legal aspects above. The Monitoring Officer has no additional comments.

8. Report details:

8.1 The draft Plan has been developed through consultation with residents, stakeholders, and Executive Member officer workshops. The plan outlines the key priorities for the next three years, focusing on Local Economy, Homes, People, and Sustainable Environment, supported by a well-run Council. The Executive has used feedback from surveys and consultations, including the Exeter Resident Survey 2024, the Exeter Budget and Corporate Priorities Consultation 2025 and the Corporate Plan Consultation 2025, to shape the plan.

Following initial consultation, the Executive Committee undertook a series of steps to produce the new Corporate Plan. This included reviewing consultation feedback to identify common themes and priorities, holding strategic planning sessions to align these priorities with the Council's long-term vision and objectives, and drafting the Corporate Plan based on this feedback. The draft plan was then subject to further consultation with the public and partner organisations.

8.2 Key priorities and intended outcomes outlined in the Corporate Plan 2025-2028 (Annex A):

Local Economy:

- A thriving, diverse, and resilient city which can adapt to changing conditions
- An increase in independent shops and a low level of empty shops
- Businesses will be reporting increase in footfall and business success
- A vibrant cultural and tourism offer
- A safe and thriving night-time economy

People:

- Health inequalities will reduce.
- Communities will be more resilient.
- More residents, including those from our priority neighbourhoods and communities, will be participating in leisure and cultural events and activities.
- A safe and thriving city with great things to see and do for everyone.

Homes:

- Better quality, energy efficient and more affordable homes to buy or rent.
- New housing developments that are well integrated into existing communities.
- Fewer people will be homeless or in temporary housing.
- The number of people on the social housing waiting list will reduce

Sustainable Environment:

- A city taking action to mitigate and adapt to the impacts of climate change.
- A carbon-neutral city.
- Well-maintained parks, open spaces and biodiversity across the city

8.3 Well-Run Council

These priorities are supported by operating a well-run council, with the following intended outcomes:

Well-Run Council

- A balanced budget achieved by focusing on priorities, efficient delivery of services and sustainable income-generation.
- Effective investment and maintenance programmes for the assets that underpin our business
- Delivery of cost effective and accessible customer focused services enabling more people to self-serve when and how they want, with a face-to-face offering for those who need it.
- Open and transparent decision making

8.4 Consultation Findings:

The consultation report, (Annex B), highlights both positive and negative feedback from residents. While there is broad support for the Corporate Plan, some concerns were raised about the feasibility of certain initiatives and the impact on local services. The Exeter Resident Survey 2024 [Resident survey results - Exeter City Council](#) and [Budget consultation results - Exeter City](#) also provided valuable insights into residents' priorities and perceptions, informing the new Corporate Plan 2025-2028.

8.5 Consultation Feedback Supporting the Corporate Plan:

Local Economy

Residents expressed positive perceptions about better retail and leisure options, which would incentivise visits to the City Centre more often, reducing the need to travel to other towns/cities. They also appreciated the idea of a vibrant and thriving high street/city centre, which would contribute to economic growth and make Exeter a more attractive city

Homes

Feedback indicated strong support for more/better housing, which can enable people working in Exeter but living outside to reside within the city. Residents also highlighted the perception that more housing would reduce homelessness. The idea of reducing housing waiting lists and providing more secure housing was also well-received.

People

The vibrant cultural offer was seen positively, making Exeter a better, healthier, and more interesting place to live. Residents believed that this would create jobs, attract businesses, and lead to better prosperity. The idea of making Exeter a city people are proud of and a better place to live and shop was also supported

Sustainable Environment

Becoming carbon neutral was perceived positively, with residents highlighting benefits such as better air quality and a greener, healthier, and safer environment. Maintaining green spaces and allotments was also seen as enhancing this priority.

8.6 Negative perceptions raised through Corporate Plan Consultation:

Some respondents highlighted negative perception of the corporate plan, including:

- Concerns about the economic viability of achieving a varied and diverse City Centre
- Concerns about safety at night, particularly for women
- Concerns about the location of new housing developments, the pressure on infrastructure and the loss of green spaces
- concerns about the effectiveness and feasibility of the sustainability initiatives proposed in the plan.

8.7 The Corporate Plan 2025-2028 addresses these concerns in the following ways

- The introduction of a city centre strategy that aims to create a thriving, diverse, and resilient city that can adapt to changing conditions. It emphasizes increasing independent shops and maintaining low levels of empty shops.
- Addressing anti-social behaviour through the Exeter Community Safety Partnership, to create a safer environment for all residents.
- Involving and engaging communities and key partners in delivering the Exeter Local Plan for future housing developments, ensuring that new housing projects are well-planned and considerate of green spaces
- Working in partnership to reduce carbon emissions and enhancing and maintaining green spaces and allotments. Outputs will be measured through a Corporate Performance Framework.

8.8 Feedback from InExeter

Extensive feedback was also received from InExeter, the business improvement district (BID) for Exeter city centre, (Annex C). Exeter's response to this can be summarised as follows:

- **City Centre's Role in Economic Success:** The Council fully agrees with recognition of the city centre as a pivotal driver of economic success for Exeter and the wider region. Council initiatives will continue to focus on enhancing the vibrancy and economic vitality of the city centre, as outlined in the Local Economy priority of the Corporate Plan 2025
- **Coordination with Exeter Partnership:** The Council acknowledges the importance of aligning our Corporate Strategy and the Exeter Partnership's objectives. We are committed to a coordinated approach to delivery, leveraging synergies to achieve our shared goals, as emphasized in the Delivering our Strategic Priorities section
- **Collaboration with InExeter:** The Council are enthusiastic about working collaboratively with InExeter to develop a comprehensive set of success measures. These measures may well extend beyond traditional metrics such as footfall and service delivery, incorporating broader indicators of success.
- **Addressing Anti-Social Behaviour:** The Council is committed to implementing a clear and effective plan to address the concerns of businesses and visitors around anti-social behaviour. This will include addressing anti-social behaviour through the Exeter Community Safety Partnership as outlined in the People section of the Corporate Plan.
- **City Centre Strategy:** This City Centre Strategy will be instrumental in shaping the future of Exeter's city centre, as highlighted in the Local Economy priority,

and The Council will be conducting further consultation on the emerging City Centre Strategy during 2025/

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

9.1 The decision to approve the Corporate Plan will ensure that the Council's strategic priorities align with the aspirations of the Exeter Vision 2040. It will focus the Council's efforts to enhance the quality of life for residents, support sustainable growth, and improve services provided by Exeter City Council, whilst also delivering a balanced budget.

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

10.1 Potential risks include:

- **Resource Allocation:** Ensuring adequate resources are allocated to implement the strategic priorities. As outlined, robust performance reporting is being developed alongside this plan which will align with budget setting processes
- **Resistance to change:** Maintaining ongoing engagement with stakeholders to ensure continued support and feedback is essential to delivery of the Plan. The recent Senior Leader restructure created a dedicated consultation and engagement function and a new consultation and engagement strategy is being developed.
- **Monitoring and Evaluation:** A corporate priorities performance framework is being developed to enable robust monitoring and evaluation of outcomes arising from the Corporate Plan 2025 - 2028

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 In light of the Council declaring a Climate Emergency, the new Corporate Plan 2025 - 2028 includes several initiatives aimed at reducing the carbon footprint and promoting sustainability, by working in partnership to reduce carbon emissions, by supporting the delivery of District Heat Networks, securing affordable clean and secure energy for the city and bringing forward an Electric Vehicle Strategy for the city.

13. Are there any other options?

13.1 There are no other options as the Council needs to plan its future direction based on the best strategic fit between the resources available to meet stakeholder needs and prevailing expectations and environmental conditions. Agreeing the Corporate Plan will provide a clear and structured plan, so that work is aligned with long-term goals and the Council is prepared to navigate any future.

Chief Executive: Bindu Arjoon

Author: Stephen Clayton

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

Background papers used in compiling this report:-

Annex A
Corporate Plan 2025 - 2028

Annex B
Corporate Plan 2025 – 2028 Consultation Stage 2 Findings

Annex C
Feedback from In Exeter

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

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Corporate Plan 2025-2028

**Local
Economy**



People



Homes



**Sustainable
Environment**



Exeter
City Council

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Introduction

We are very proud to introduce our Corporate Plan for 2025 to 2028 which sets out the key priorities that we will focus on over the next four years.

The government published its White Paper on Devolution and Local Government Reorganisation in December 2024 and whilst we believe devolution and local government reorganisation offers an exciting, once in a generation opportunity for the city, we also need to keep focused on the day job of delivering the best public services for residents, business and visitors.

Exeter City Council and its partners have an important role to play in improving the lives and wellbeing of people who live in, visit and work in Exeter.

This plan has been developed in partnership with our residents and partners in the city and sets out the key priorities that we will focus on over the next four years.

Each key area has a delivery plan outlining specific, measurable and achievable metrics that will track progress against priorities and our intended outcomes.

Extensive consultation has taken place with our residents to ensure that our identified priorities match those of our residents and communities as well as those who visit or work in Exeter.

After carefully considering the feedback we received, our new Corporate Plan will prioritise delivery in four key areas - Local Economy, Homes, People and Sustainable Environment.

Delivering these key priorities - in collaboration with our partners and stakeholders in the city - will contribute to the future success of both Exeter and the wider area and will contribute to meet the ambitious aspirations set out in the Exeter Vision 2040.

Delivery of the plan will be carefully monitored against the key metrics we have set out to ensure it is successful in meeting the needs of our residents, communities, and businesses.

Despite the continued tough economic climate that all councils must operate in, there's a huge opportunity for Exeter to expand and grow sustainably in the years ahead. Our new Local Plan - the Exeter Plan - sets out how we plan to do this.

Exeter continues to be a fantastic place to live with a great quality of life with a thriving city centre, we are fast-growing destination city, a city of culture and heritage, with a high-performing economy that makes us the economic powerhouse of Devon.

Our new Corporate Plan will help to ensure that the city continues to fulfil its potential and to boost quality of life for all.

Cllr Phil Bialyk,
Leader

Bindu Arjoon,
Chief Executive



Exeter Vision 2040

We play a leading and significant role in delivering the aspirations of the Exeter Vision, and our four key priorities - Local Economy, Homes, People and Sustainable Environment - align with the aspirations of the Exeter Vision.

The Exeter Vision 2040 was adopted in December 2019. It highlights transformational change and sustainable growth to be delivered in collaboration with our stakeholders and partners.

It spells out the social, economic and environmental outcomes that the city, its stakeholders and communities aspire to.

The Vision's mission statement is:

“By the time they are an adult, a child born in Exeter today will live in a city that is inclusive, healthy and sustainable - a city where the opportunities and benefits of prosperity are shared and all citizens are able to participate fully in the city’s economic, social, cultural and civic life.”

The 7 areas of focus of the Exeter Vision 2040 are:

- Innovative and analytical city
- Healthy and inclusive
- The most active city in the UK
- Accessible world-class education
- Liveable and connected
- A leading sustainable city
- City of culture

The services provided to Exeter’s residents and communities make an important contribution to the Vision. But it can only be delivered by working collaboratively with our partners.

Key to this is the Exeter Partnership, made up of representatives from leading public and private sector organisations from within the City of Exeter and the wider region.

The Partnership focuses on key areas including culture, climate, housing, the city centre, and health, with an emphasis on collaboration and innovation to achieve meaningful outcomes for Exeter. It actively supports other key stakeholders in achieving their goals, whenever those priorities align with Exeter’s Vision, fostering collaboration for the benefit of the entire city and the greater region.

The Exeter Partnership:

- Royal Devon University Healthcare
- NHS Foundation Trust
- Exeter College
- University of Exeter
- Network Rail
- GWR
- Exeter City Council
- Devon County Council
- Met Office
- Exeter City Community Trust
- Exeter Chiefs
- Exeter Cathedral
- Exeter Chamber of Commerce

- Colab
- Sport England
- InExeter
- Devon and Cornwall Police
- Police and Crime Commissioner
- Homes England
- Devon Community Foundation
- Oxygen House
- Jobcentre Plus
- Focus Training
- Live West
- Arts Council England
- Earl of Devon
- Steve Race MP
- David Reed MP



Delivering our four Strategic Priorities

Identifying four strategic priorities - Local Economy, Homes, People and Sustainable Environment - enables us to focus on and invest in issues that are most important to our residents and communities and reflect our political priorities. The priorities were identified by councillors following extensive feedback from their work with residents, business and partners in the city as well as formal consultation with residents.

For each priority we have set out the intended outcomes. In the appendix, we have included how we will measure performance (strategic outcome measures) and how we will measure success (service delivery measures).





Local Economy

We will build on Exeter's thriving economy by attracting new businesses and continued investment in our city by collaborating with national, regional and local businesses and partners.

We will work together on regeneration and growth activities designed to attract new businesses and continued investment in our public spaces, culture, heritage and tourism industries.

Intended Outcomes:

- A thriving, diverse and resilient city which can adapt to changing conditions.
 - An increase in independent shops and a low level of empty shops.
 - Businesses will be reporting increases in footfall and business success.
 - A vibrant cultural and tourism offer.
 - A safe and thriving night-time economy.
- To achieve this our strategic efforts will focus on partnership work to deliver a City Centre Strategy and support regeneration and investment across the city.
- We will focus on building capacity and capability to work at national and regional levels to encourage growth, regeneration and inward investment.





People

We will encourage residents and community groups, to be healthier and more active, promote inclusion and community cohesion and efforts to ensure people feel safe and welcome.

Intended Outcomes

- Health inequalities will reduce.
- Communities will be more resilient.
- More residents, including those from our priority neighbourhoods and communities, will be participating in leisure and cultural events and activities.
- A safe and thriving city with great things to see and do for everyone.

To achieve this our strategic efforts will focus on partnership work alongside our priority neighbourhoods and communities. We will work to ensure the provision of sustainable cultural, leisure and enrichment opportunities. We will secure and expand the work of the Sport England Place Partnership and Wellbeing Exeter, and we will address anti-social behaviour through the Exeter Community Safety Partnership.





Homes

We will expand our own council housing. We will do all we can to tackle homelessness, and we will engage communities, the city's key partners and developers in delivering the homes which Exeter needs, whilst protecting our valuable green spaces.



Intended Outcomes

- Better quality, energy efficient and more affordable homes to buy or rent.
- New housing developments that are well integrated into existing communities.
- Fewer people will be homeless or in temporary housing.
- The number of people on the social housing waiting list will reduce.

To achieve this our strategic efforts will focus on working in partnership to deliver the Exeter Plan and Liveable Exeter sites. We will secure investment for building more social housing and reduce rough sleeping and the number of people in temporary accommodation, enabling more people to find sustainable housing.





Sustainable Environment

We will reduce our own carbon emissions and work with the city's key partners, businesses, communities and residents to take action to mitigate and adapt to the impacts of climate change.

Intended Outcomes

- A city taking action to mitigate and adapt to the impacts of climate change.
- A carbon-neutral city.
- Well-maintained parks, open spaces and biodiversity across the city.

To achieve this our strategic efforts will focus on working in partnership to reduce carbon emissions, by supporting the delivery of District Heat Networks, securing affordable clean and secure energy for the city and bringing forward an Electric Vehicle Strategy for the city.





A Well-Run Council

We will operate a well-run council, delivering efficient and effective, value for money public services that meet the needs of residents, business, visitors and other stakeholders.



Intended Outcomes

- A balanced budget achieved by focusing on priorities, efficient delivery of services and sustainable income generation.
- Effective investment and maintenance programmes for the assets that underpin our business.
- Delivery of cost effective and accessible customer focused services enabling more people to self-serve when and how they want with a face-to-face offering for those residents who need it.
- Staff and members who feel valued, supported and equipped to achieve the best they can for residents and stakeholders.
- Open and transparent decision-making.

To achieve this, we will work within our Code of Corporate Governance, to ensure good practice in financial services, governance and staff and Members health and wellbeing.

We will actively communicate and engage with residents and communities and seek their views on projects and initiatives in line with our Consultation Charter.

Equality and diversity will be a priority to ensure we meet our legal duties and promote inclusion in all that we do.



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Appendix: Strategic Outcome & Service Delivery Measures

Strategic Outcome Measures

We will measure performance by monitoring:

- City Growth Data.
- Total spend on Culture and Heritage.
- Vacant Shops rate.
- Publication of City Centre Strategy.
- Progress milestones for Liveable Exeter sites.

Service Delivery Measures

We will define success by:

- Improvements in street cleansing, reducing litter and removing graffiti.
- Excellent food hygiene and safety ratings for food, beverage and hospitality outlets publishing results and promoting good practice.
- Effective licencing of night-time and hospitality economy to maximum safety and enjoyment for all.
- Well-regulated and successful street trading and markets.
- Ensuring events and celebrations in the city are well-run and safe through our work on the Safety Advisory Group.
- Safe, accessible and sustainable licenced taxi services across the city.

Priority:
Local Economy

Strategic Outcome Measures

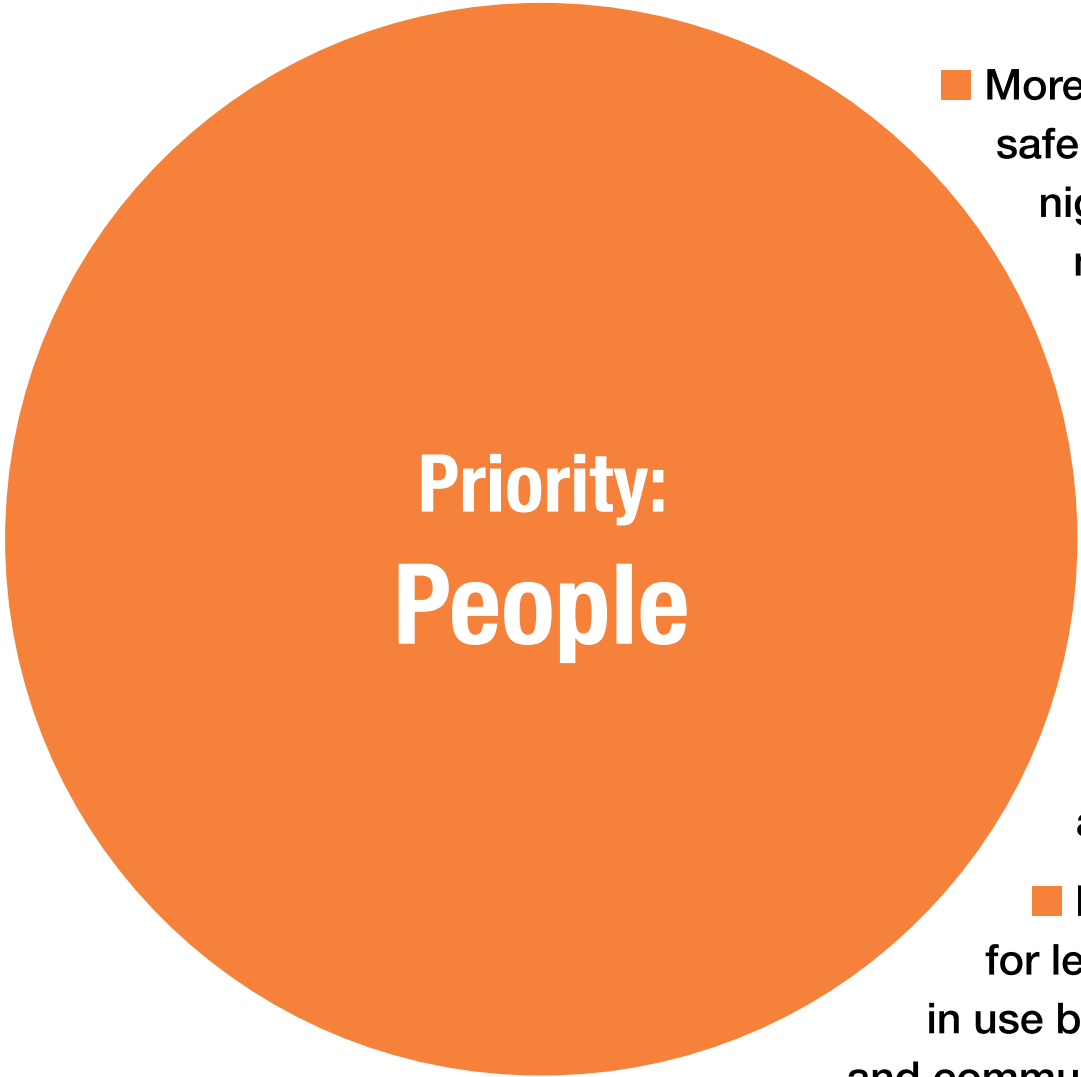
We will measure performance by monitoring:

- Health inequalities data from Public Health Devon.
- Activity levels amongst adults in priority neighbourhoods as reported in the Local Active Live Survey
- Exeter as a safe place to live, evidenced in the annual LGA Residents Survey.
- Exeter as a welcoming, inclusive city, evidenced in the annual LGA Residents Survey.
- Annual report on outputs from the Sport England Place Partnership.
- Quarterly performance reports from Wellbeing Exeter.
- Annual report on the delivery of the Community Safety Partnership Action Plan.

Service Delivery Measures

We will define success by:

- More people reporting that they are feeling safe in the city during the day and at night, particularly those from priority neighbourhoods and communities.
- More inactive people in our priority neighbourhoods becoming active.
- Year on year increase in residents taking up Exeter Leisure membership and use of leisure centres.
- Greater understanding about the impacts of ward grants on inclusion and community cohesion.
- More people using the Green Circle for leisure and active travel with increases in use by people in priority neighbourhoods and communities.



Strategic Outcome Measures

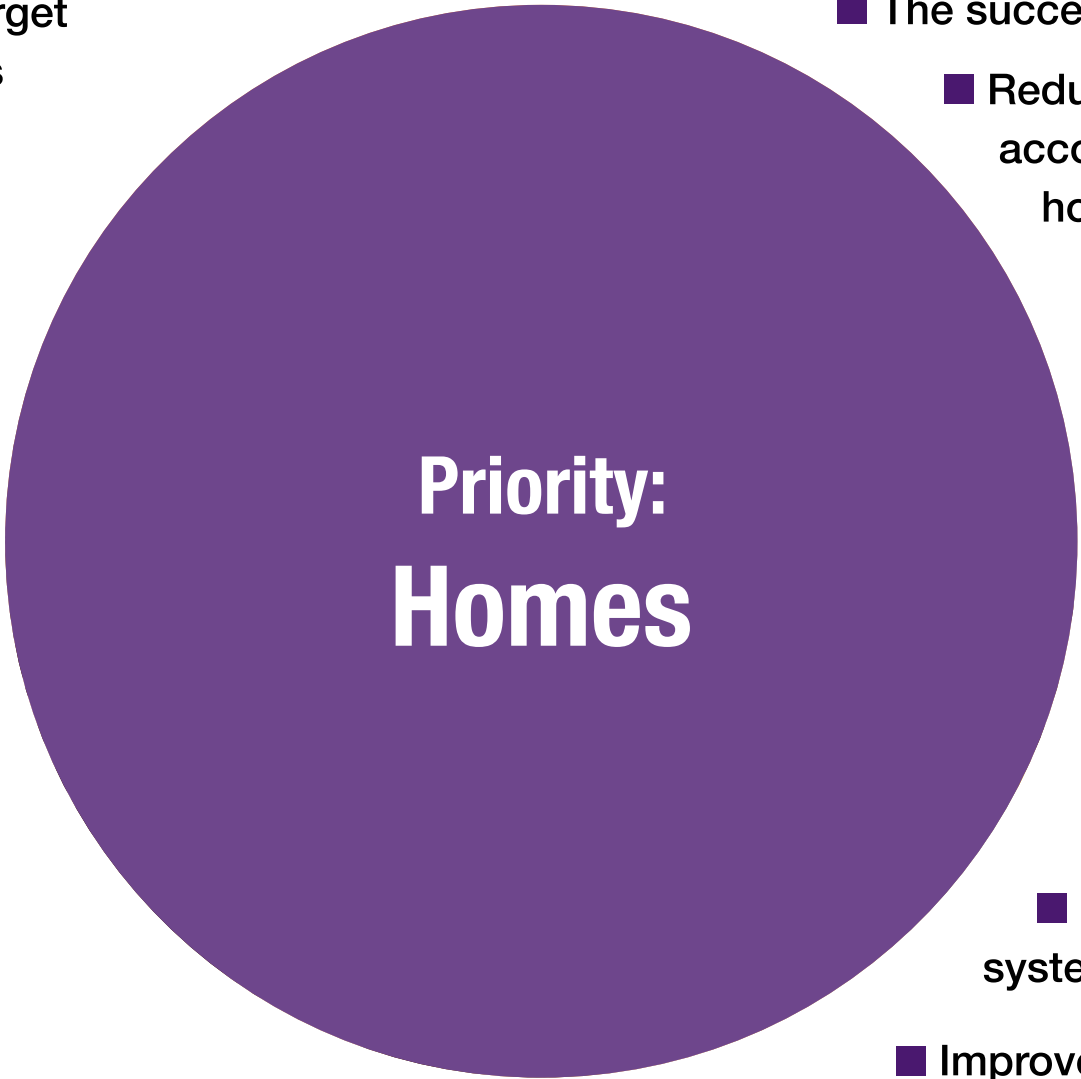
We will measure performance by monitoring:

- Milestones towards the Exeter Plan target of delivering 5,500 additional new homes by 2041.
- Milestones towards delivering the affordable housing targets on brownfield sites.
- Agreements with Homes England and the County Combined authority on the Devon and Torbay Strategic Housing Pipeline.

Service Delivery Measures

We will define success by:

- The successful delivery of Liveable Exeter sites.
- Reductions in the number of people in temporary accommodation Increases in the number of social housing units.
- Improvements in tenant satisfaction rates.
- Retrofitting our council houses to reduce carbon emissions and energy bills.
- Effective monitoring of Houses in Multiple Occupation aimed at improving the quality of homes.
- Improving access to disabled facilities and warm home grants for those in greatest need.
- Improvements in the planning application system and process.
- Improvements in the building regulations system and process.
- Increases in the number of affordable homes given planning permission.
- Reductions in the number of people living in fuel poverty.



Strategic Outcome Measures

We will measure performance by monitoring:

- Increase in renewable energy sources available for the city.
- Year on year reductions on greenhouse gas emissions for the city.
- Milestones towards the delivery of a new District Heat Network in the city.
- Adoption of an electric vehicle strategy for the city.

Service Delivery Measures

We will define success by:

- Reduced carbon emissions from council buildings and services.
- More Energy efficient council homes.
- Increased use of renewal energy.
- Decarbonisation of Leisure facilities.
- New Materials Reclamation Facility with reduced emissions.
- Increases in recycling rates.
- Rolling out of food waste collection city-wide.



Strategic Outcome Measures

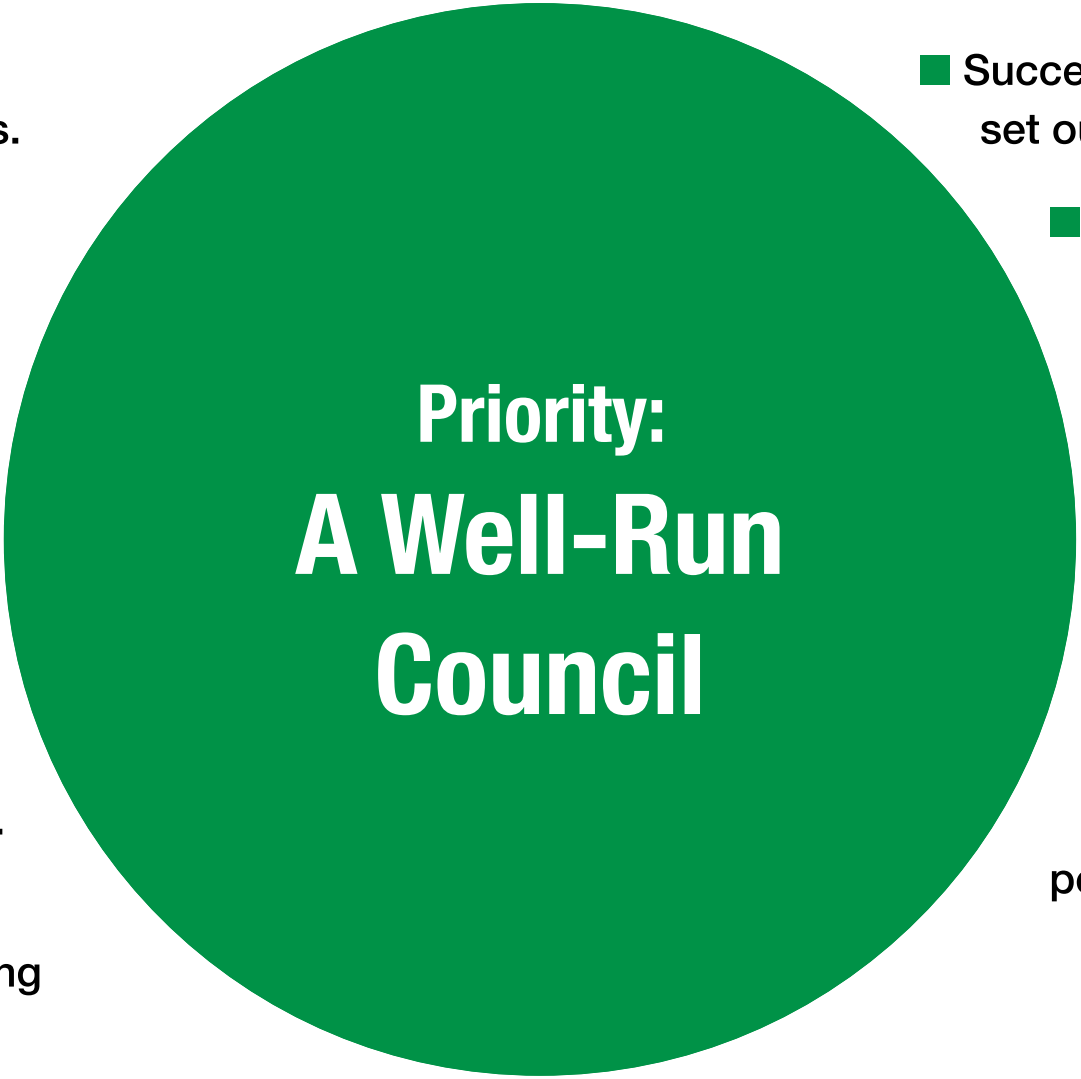
We will measure performance by monitoring:

- Key Performance Indicators set out in Directorate and service business plans.
- Income and expenditure plans and taking early action to understand and mitigate variances.
- The partnership register to ensure partnerships achieve shared ambitions, use innovative delivery models and unlock investment.
- Asset maintenance programme to improve value for money income potential and to maximise their longevity.
- Staff wellbeing through regular staff surveys to ensure our health and wellbeing offer is meeting their needs.

Service Delivery Measures

We will define success by:

- Successful management and mitigation of risks set out in the Corporate Risk Register.
- Financial Statements and Value for Money reports published with an unqualified opinion from External Auditors.
- Collection of the money owed to the council and payments to creditors undertaken in line with good practise including ensuring invoices are paid within 30 days.
- Recovery of overpaid Housing Benefits; sundry debt collection; council tax and business rates collection achieving best quartile performance against comparator councils.



Strategic Outcome Measures

We will measure performance by monitoring:

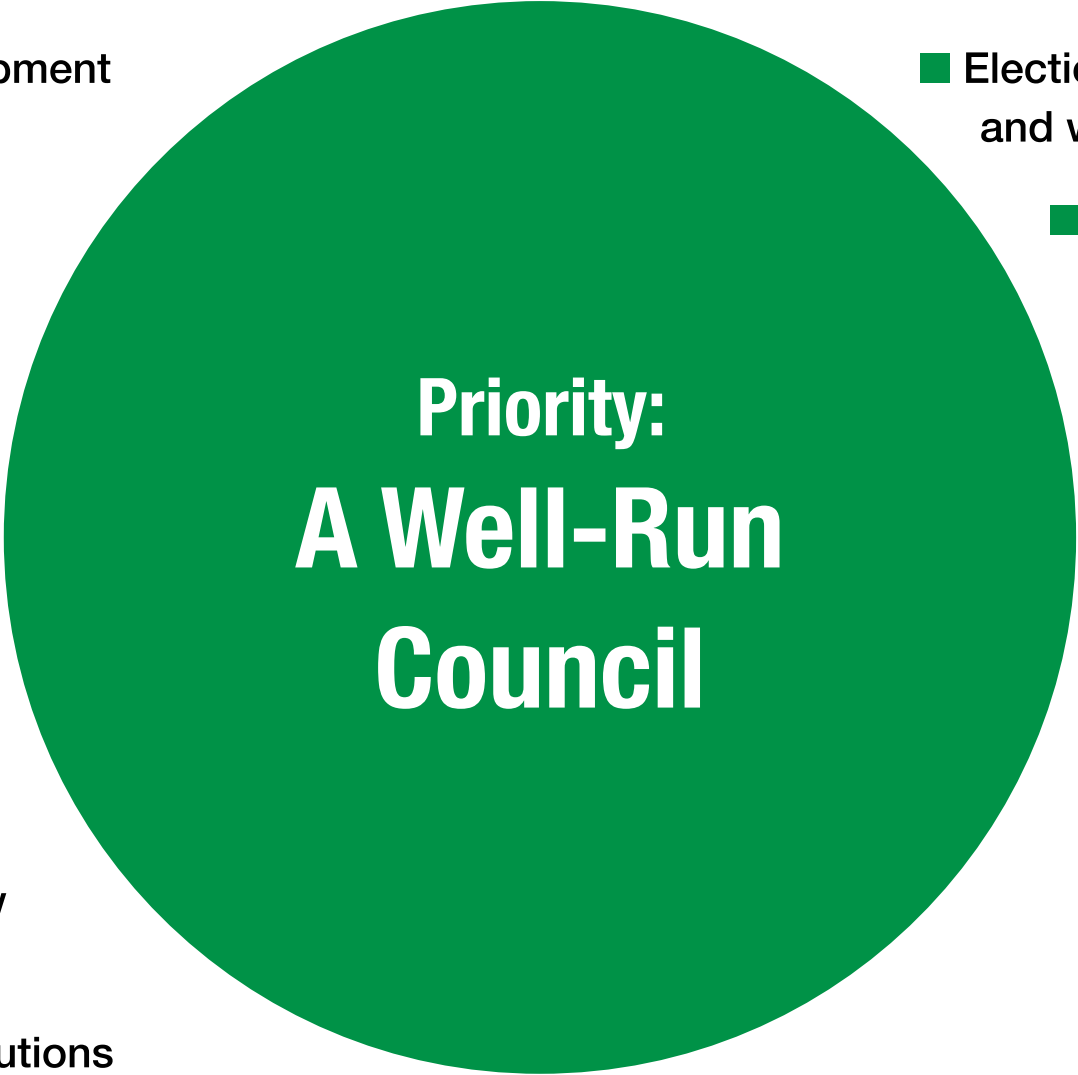
- Staff and Member training and development plans to develop the capability of our Members and staff to ensure they are highly motivated, value driven, well trained, supported with agile working practices and technologies.
- Incidents and policy and procedure on health and safety at work to ensure all staff are aware of its significance for their roles and responsibilities.
- Implementation of our Data Strategy to manage and secure data and information and ensure that we are open and transparent and diligent in how we care for resident data.
- The delivery of the Strata Services Solutions Ltd* Business Plan to ensure effective and efficient management and modernisation of our information, communications and technology assets.

*Strata Services Solutions Ltd is a council-owned company providing information technology and digital transformation services

Service Delivery Measures

We will define success by:

- Elections delivered in accordance with legislation and without legal challenge.
- Council and committee papers published five clear days before meetings.
- Positive staff recruitment and retention rates and best quartile sickness absence performance.
- Reports on emergencies and disruptive incidents demonstrating our capability and resilience in our responses.



Reviewing and updating this plan

We will review this plan and report on progress on an annual basis. We will also publish regular reports setting out progress delivering the priorities and action, including the supporting actions in our strategies and service plans.

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Corporate Plan 2025-2028

Local
Economy



People



Homes



Sustainable
Environment



The Corporate Plan 2025 - 2028
is published by Exeter City Council,
Civic Centre, Paris Street, Exeter, EX1 1JN.



Exeter
City Council

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Corporate Plan 25-28 consultation: Second Stage Findings

Context

Information gathered from a Residents Survey and Budget Consultation exercises carried out in 2024. Both these exercises used market research techniques and the data from them can be found here on the Council's website, ([Budget consultation results - Exeter City Council](#)), helped Executive Members of the Council to develop the new Corporate Plan for 2025 to 2028. The draft plan was subject to further consultation with the public and partner organisations during March and April 2025. This was done to capture the views of the target audiences to understand how the four priority areas of the proposed Corporate Plan would positively impact them. This report presents the findings of the survey.

Quantitative Information

The below points summarise the quantitative aspects captured from the council run survey. The survey was available on the council website and promoted through social media and emails to networks and partner databases. A total of 53 respondents completed the survey. The key demographic information related to those respondents is displayed below:

Respondent demographics	Percentages
Connection to Exeter	<ul style="list-style-type: none">• 52% live in Exeter• 33% both live and work in Exeter• 12% live outside of Exeter but work in the city• 4% lives and work outside of Exeter, but regularly visit the city
Age	<ul style="list-style-type: none">• 65-74 (13) 26%• 55-64 (11) 22%• 35-44 (8) 16%• 45-54 (8) 16%• 75+ (6) 12%• 25-34 (1) 2%• Prefer not to say (3) 6%
Gender	<ul style="list-style-type: none">• 52% female• 44% male• 4% preferred not to say
Ethnicity	<ul style="list-style-type: none">• 92% of respondents were from white backgrounds• 2 % were of a mixed ethnic background• 6% preferred not to say

Respondent demographics	Percentages
Long-Term Health Condition/Disability	<ul style="list-style-type: none"> • 61% did not had a long-term health condition • 35% had a long-term health condition • 4% preferred not to say
ECC Housing Services Tenant	<ul style="list-style-type: none"> • 96% were not a tenant of ECC housing services • 4% preferred not to say

Summary of Respondent Demographics

Demographically, the survey data largely captured the views of older citizens and those from a White ethnic background. Very few young people participated and involvement from those identifying themselves as being from a non-White ethnic background was limited. Additionally, the views of people who are a tenant of ECC housing services were not represented in the 53 participants. Therefore, the data captured – whilst valid – has limitations in that representative views of the entirety of Exeter's population are not fully represented.

Summary of Qualitative Information

Below is a summary of the qualitative information gathered from the survey, which was specifically linked to the four priorities of the proposed Corporate Plan 2025 to 2028.

1. Focus Area: Local Economy

Both positive and negative perceptions were expressed in the survey in relation to the local economy. Positives are outlined below:

- Better retail and leisure options will have an incentive to visit the City Centre more often, reducing the need to travel to other towns/cities.
- Better and wider choice of independent shops and shopping options; increased footfall; better shopping experience; vibrant and thriving high street/city centre; economic growth.
- Live in a city people are proud of; better place to live and shop; make Exeter a more attractive city if achieved.

Negative perceptions, as captured by the survey, are outlined below:

- Independent shops are often niche, expensive and may not increase footfall.
- Some have stated that outcomes and proposed evidence of success are too vague and not measurable.
- Some people do not / no longer visit the City Centre and prefer online shopping; adding that rent, rates, taxes, and NI are high and unaffordable for businesses.

- Some respondents expressed negative views towards the proposals, indicating they are unrealistic and not achievable.
- Car parking costs is a significant barrier to people shopping in the City Centre.

2. Focus Area: People

Both positive and negative perceptions were given in the survey in relation to people. Positives are outlined below:

- Vibrant culture offer makes Exeter a better, healthier, and interesting place to live; more things to do; creates jobs; attracts businesses; better prosperity.
- Live in a city people are proud of; better place to live and shop; make Exeter a more attractive city if achieved.
- Better city can lead to skilled people and their families moving into the area.
- Make Exeter City Centre thriving, diverse and resilient.

Negative perceptions, as captured by the survey, are outlined below:

- Some have stated that outcomes and proposed evidence of success are too vague and not measurable.
- A common theme within the survey responses was people had safety concerns especially at night. This was quite prominent especially with women.
- Spending is the only way to monitor impact on 'vibrant culture and tourism offer,' no measure on impact to people's lives or local economy.

3. Focus Area: Homes

Both positive and negative perceptions were expressed in the survey in relation to homes. Positives are outlined below:

- More/better housing can enable people working in Exeter, but living outside of Exeter, to live within the city.
- More housing will reduce street sleepers; fewer homeless people; leading to nicer environment to be in.
- Better city can lead to skilled people and their families moving into the area.
- Reduce housing waiting lists.
- More secure population.

Negative perceptions, as captured by the survey, are outlined below:

- Some respondents were critical expressing they are unhappy about the level of new-build housing development feeling this is excessive due to reduction in greenspace, for example parts of Grace Road Playing Fields being sold off for development and overdevelopment/congestion.

- This is supported with the perception that facilities people need – like hospitals, dentists, police, recycling, GP services, schools, parking – cannot keep up with the increased demand due to higher population levels.
- Some respondents indicated that more housing does not necessarily mean lower rents and there needs to be better focus on building homes that are fit for purpose, rather than just small co-living pods.
- Some respondents were unhappy about purpose-built student accommodation.

4. Focus Area: Sustainable Environment

Both positive and negative perceptions were expressed in the survey in relation to a sustainable environment. Positives are outlined below:

- Becoming carbon neutral, if achieved, has positive perceptions like better air quality; a greener, healthier, and safer environment to reside in and enjoy.
- There were additional comments that green spaces and allotments being maintained would enhance this.

In terms of negative aspects, some respondents indicated that the idea of carbon neutral / Net Zero is not realistic to implement, citing the following aspects:

- Public transport and cycling routes were criticised by respondents.
- Car parking costs are perceived as a significant barrier to people shopping in the City Centre.
- UK global emissions at 1% will have negligible effect on the rest of the world.
- Increased pressure and cost to decarbonise.
- Some thought proposals were unrealistic and not achievable.
- Carbon neutral too ambitious by 2030 with some citing historical ambitions not being achieved, so questioning if it will be achieved this time.
- Some believe the council does not have the finances to maintain green spaces to help become carbon neutral.
- Excessive costs to implement.

Conclusion

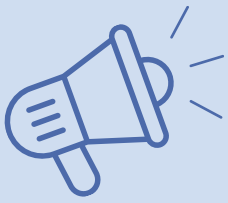
Respondents did not suggest changes to the Corporate Plan priorities, but nevertheless both supported and criticised aspects. As is often expected with open surveys of this nature, the findings were quite mixed and varied in relation to the City Council's Corporate Plan. Both enthusiasm and criticism were received throughout the survey.

Some key themes are outlined below:

- In relation to the **local economy**, respondents perceived a varied and diverse City Centre as a positive thing. However, the viability of achieving this, especially from an economic perspective, was questioned.

- The **people** aspect, in relation to a vibrant cultural offer, was mainly seen as a positive thing in terms of people being healthier and having more interesting things to do. However, safety concerns, especially for women at night, is a serious factor.
- In terms of **housing**, a higher volume of homes is seen as a positive thing in terms of reducing housing waiting lists and homelessness. However, respondents largely had a negative view about exactly *where* new housing was being built and concerned that green spaces would be lost. Respondents also highlighted infrastructure constraints as more housing means a larger population needing existing services (GP's, schools etc.) that are not necessarily increasing capacity.
- Outcomes relating to **sustainable environment** received the most critical feedback in terms of public transport and cycle routes not being what people want; people needing their vehicles yet car parking a financial challenge; pressure and cost to decarbonise; Exeter's efforts alone having minimal global impact; viability to achieve etc. However, there were positive perceptions like better air quality and greener/healthier space, but some people felt it is more about *if* this can be achieved rather than *when*.

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Business Voice

InExeter will actively listen, lobby and campaign to make Exeter's business voice heard.



ISSUE:

APRIL 2025

Response to Exeter City Council's Corporate Strategy Consultation

RESPONSE:

Dear Exeter City Council,

Thank you for the opportunity to respond through the consultation on the new Corporate Strategy.

We welcome the setting of a clear direction and objectives at this crucial time, given the expected challenges and opportunities which will result during this period of local government reorganisation and devolution.

As the Business Improvement District, for the city, we are providing a written response on behalf our business members with a specific focus on the Local Economy priority.

Feedback on the Strategic Priorities:

We welcome the four strategic priorities—local economy, homes, people, and sustainable environment—as key elements of a successful city.

It is encouraging to see the renewed Exeter Partnership referenced in the Vision 2040 introduction, reflecting the importance of collaborative working. However, we are keen to understand how the implementation of the Corporate Strategy will align with the recently renewed objectives of the Exeter Partnership.

While the strategy's priority objectives are congruent with the themes emerging from the Partnership (e.g., city centre, housing, climate, and culture), it is unclear whether the delivery plan which will emerge from this strategy and the action plans being worked on by the Partnership's working groups are intended to be aligned or treated as separate?

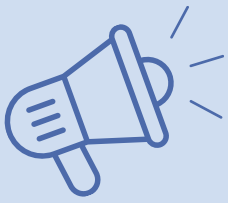
Whilst it would make sense for those workstreams to be strategically aligned, there would be concern about the Place Partnership being used primarily as a vehicle for delivering the council's Corporate Strategy. The proposed indicators of success appear to be local authority-led rather than collectively agreed, which could limit the broader ambition of the Place Partnership.

General feedback on the 'Local Economy' priority

As the Business Improvement District, InExeter strongly supports a renewed focus on the local economy, particularly given that budgetary constraints have significantly reduced the council's activity around economic development in recent years.

We are pleased to see the local economy recognised as a strategic priority. Attracting new businesses and investing in public spaces, culture, heritage, and tourism are essential to Exeter's continued success. However, the city centre and InExeter's role should be explicitly referenced in the strategy. The success of the city centre is critical not only to Exeter's economy but also to Greater Exeter and the wider region, delivering employment, investment, connectivity, and vibrancy.

Continued...



Business Voice

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There is, however, a disconnect between the intended outcomes for the local economy and the service delivery and outcome measures listed in the appendix. While the outcomes are well-intentioned, the measures seem to focus on maintaining existing service delivery rather than introducing innovative improvements. At this critical juncture, the strategy could do more to raise aspirations, address underlying challenges, and position Exeter strongly for the future—particularly in light of potential devolution.

Additionally, safety is noticeably absent from the Local Economy section (aside from references to the night-time economy). Anti-social behaviour (ASB), particularly in the daytime, remains the single biggest threat to the city centre's appeal and is the most pressing concern for our business community. The strategy must acknowledge and address ASB more explicitly as part of the local economy agenda, ensuring that safety and business confidence go hand in hand.

We also note the reference to the City Centre Strategy within this section of the Corporate Plan. This work began over a year ago with the commission of LDA Design and stakeholder workshops at Positive Light Projects in June 2024. However, progress has been slow, and the prolonged delay risks losing stakeholder support and momentum. Given its significance, the finalisation of this document should be prioritised and accelerated to ensure it delivers meaningful outcomes for the city.

Specific feedback on the Local Economy section

Proposed Outcomes:

1. A thriving, diverse, and resilient city:

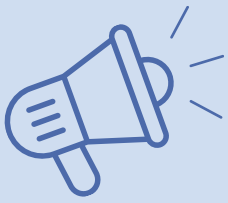
InExeter fully supports this outcome.

City centre businesses have faced prolonged economic uncertainty due to multiple factors, including the Covid pandemic, the ongoing effects of inflation, and global instability such as Russia's invasion of Ukraine. The upcoming changes to business rates relief, alongside rising payroll costs—including employer National Insurance and the National Minimum Wage—add further financial pressure. While the full impact of these challenges remains to be seen, businesses are increasingly concerned about their ability to adapt and remain viable.

InExeter maintains a close dialogue with businesses through a daily physical presence in the city and ongoing engagement with our members. However, we lack the resources to provide the tailored, dedicated support that businesses often indicate would be beneficial. Through the delivery of this strategy, we encourage the council to consider how it can actively support small and medium enterprises (SMEs)—whether through funding, training, access to grants, or business advisory services—to foster resilience and sustainable growth.

Placemaking, wayfinding and public realm improvements should also be a strategic priority to enhance the city's attractiveness. The city centre notably lacks high-quality green and destination play spaces that could foster social interaction, provide play opportunities for children, and support events and markets. Through initiatives such as the Fore Street Flea and Parklets project, InExeter has identified areas that would benefit from targeted investment in improved lighting, seating, biodiverse green spaces, and pedestrian-friendly streets. Specific locations such as Musgrave Row, Fore Street, and the old bus station site present opportunities for transformation into more welcoming and vibrant spaces.

Continued...



Business Voice

InExeter will actively listen, lobby and campaign to make Exeter's business voice heard.



InExeter supports the council's ambition to introduce more residential opportunities within the city centre. However, could the strategy go further by actively promoting the development of mixed-use properties that integrate residential, retail, and leisure spaces? Recent redevelopments such as Paternoster House and Concord House demonstrate the potential for well-designed city centre living to contribute positively to the local economy. Encouraging similar developments could help diversify the city centre offer, increase footfall, and enhance long-term resilience.

2. An increase in independent shops and low vacancy rates:

InExeter partially support this outcome.

Reducing vacancy should be a strategic priority. The current vacancy rate stands at 12%, which is slightly below the national average, but Exeter cannot afford to be complacent.

Exeter benefits from a diverse and thriving mix of independent businesses, with 40% of InExeter's business members being independents. These family-run, owner-managed businesses bring entrepreneurial spirit and a deep passion for the city, contributing significantly to Exeter's unique character. InExeter actively promotes these businesses through initiatives such as the Exeter Independent Gift Card, our Indie Shopping and Food & Drink maps, and dedicated social media campaigns.

However, a strategy focused exclusively on independent shops may not be the most effective way to reduce vacancy rates. A balanced approach is needed, which includes attracting suitable national brands that are willing to invest in the city centre, complementing the independent offer.

In partnership with Exeter Chamber, we facilitated a session in June 2024 with property owners, commercial agents, and Exeter City Council to explore solutions for addressing city centre vacancy. Following this, an action plan was developed and submitted to the council. To build on this work, the strategy should clearly outline how the council intends to adopt a strategic and proactive approach to diversifying the city centre economy. This should extend beyond retail to incorporate more leisure, hospitality, and experience-based activities, ensuring a vibrant and resilient city centre.

Furthermore, High Street Rental Auctions present an opportunity to transform underused buildings into dynamic and engaging spaces. The strategy should specify how the council plans to lead and implement this process to revitalise vacant premises effectively.

3. Increased footfall and business success:

InExeter partially supports this outcome.

Accurately measuring business success and the city's overall performance is crucial. However, footfall alone is a blunt metric—it does not account for conversion to sales, dwell time, or visitor spending patterns.

Continued...



Business Voice

InExeter will actively listen, lobby and campaign to make Exeter's business voice heard.



For nearly a decade, InExeter has funded footfall monitoring, but we are now exploring alternative data collection methods that provide richer insights. Instead of relying on static footfall cameras, we plan to invest in methodologies such as geo-located mobile phone data and anonymised debit card transaction analysis. These approaches will offer a more detailed understanding of visitor demographics, spending habits, and overall economic performance.

It would be helpful if the council clarified which specific measures it intends to use to assess business success beyond footfall. Defining these indicators will ensure that any performance evaluation meaningfully reflects the economic health of the city centre.

A collaborative approach to city performance monitoring would be beneficial. If data collection is a strategic priority for the council, we would welcome discussions on jointly funding a more comprehensive and effective approach to measuring business success.

4. A vibrant cultural and tourism offer:

InExeter fully supports this outcome.

Exeter has significant potential to further develop its cultural and tourism offer, contributing to the city's economic prosperity. However, Visit Exeter has been under-resourced for several years, limiting the ability to fully capitalise on this opportunity.

Despite this, collaborative working has demonstrated how strategic partnerships can drive impactful campaigns. InExeter and Visit Exeter have successfully delivered ambitious, city-wide initiatives, such as Experience the Magic of Christmas in Exeter (December 2024) and Exeter's June Boom (June 2025), a festival celebrating arts, culture, and creativity. By aligning shared objectives and pooling resources, we have been able to partner effectively with cultural institutions and stakeholders to enhance Exeter's appeal.

To develop and sustain a vibrant cultural and tourism offer, it would be beneficial for the council to explicitly recognise the value of initiatives like June Boom 2025 and other collaborative marketing campaigns within the strategy. These efforts play a crucial role in strengthening Exeter's identity as a cultural destination and ensuring long-term success.

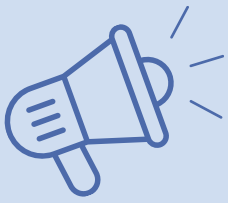
5. A safe and thriving night-time economy.

InExeter fully supports this outcome.

CACI Research commissioned in Summer 2024 by InExeter ahead of our ballot, identified the evening and night-time economy (ENTE) as having the greatest potential for driving economic growth in the city. Recognising this, we have been actively working to enhance Exeter's night-time offer.

In September 2024, InExeter established a strategic ENTE working group, a sub-group of the Community Safety Partnership, to focus on strengthening the city's night-time economy. This builds on previous research conducted in 2022, which informed the development of a city-wide strategy and action plan.

Continued...



Business Voice

InExeter will actively listen, lobby and campaign to make Exeter's business voice heard.



InExeter is also leading Exeter's bid for Purple Flag Status, demonstrating our commitment to safety, vibrancy, and best practice in the night-time economy. To achieve this, we have formed a strategic partnership involving key stakeholders, including Exeter City Council, Devon & Cornwall Police, the University, the Royal Marines, Exeter College, GWR, and Stagecoach.

As part of this process, InExeter has:

- Commissioned research to inform a strategic approach.
- Developed and agreed a 12-month action plan to enhance the city's night-time economy.
- Funded the Purple Flag entry fee and taken responsibility for compiling and submitting the required documentation.

We welcome the council's support in achieving Purple Flag accreditation and ensuring that Exeter continues to develop a safe, diverse, and thriving night-time economy.

Feedback on Outcome Measures

1. City Growth Data

- Clarity is needed on what specific data sets are currently being used and which will be adopted in the future.
- As of 1st April 2025, InExeter will no longer collect footfall data. We are actively exploring alternative methods for assessing city performance.
- We would welcome discussions on potential collaboration in gathering insights, ensuring robust and meaningful data collection.

2. Total Spend on Culture and Heritage

- We assume this metric pertains solely to council expenditure. However, it is important to acknowledge that spend in this area has significantly decreased in recent years.
- A reduced budget does not necessarily equate to a culturally vibrant offer. Consideration should be given to the impact of partnerships, such as the collaboration between InExeter and other stakeholders in initiatives like June Boom 2025.
- Is there scope to incorporate the broader value of cultural activity delivered by the city's various cultural producers into this metric?

3. Vacant Shops Rate

- The current approach involves a foot patrol conducted by ECC and periodic vacancy assessments within the BID area.
- We recommend formalising and standardising this metric for consistent and regular tracking.

4. Publication of City Centre Strategy

- Over a three-year period, it is reasonable to expect more than just the publication of the strategy; delivery of specific actions linked to the strategy should be a measurable outcome.

Continued...



Business Voice

InExeter will actively listen, lobby and campaign to make Exeter's business voice heard.



- Are there any existing surveys that assess public satisfaction or perceptions of vibrancy in the city centre? If not, could such surveys be introduced to provide qualitative insights?

Feedback on proposed Service Delivery Measures

1. Improvements in street cleansing, reducing litter and removing graffiti

- In the earlier consultation, there was a suggestion that city centre cleansing services would be reduced. Is there a commitment to maintaining a baseline standard of service while also enhancing street cleansing efforts?
- It is unclear which outcome this measure relates to.

2. Excellent food hygiene and safety ratings

- The publication of hygiene ratings and promotion of good practice is valuable, but it is unclear which outcome this measure aligns with.
- While important, it is questionable whether higher hygiene ratings directly influence visitors and spend in the city centre.

3. Effective licensing of night-time and hospitality economy

- This is an important factor in ensuring a safe and enjoyable night-time economy. However, the Purple Flag criteria encompass broader aspects that should be considered, such as:
 - A late-night offer that is more diverse than youth-oriented and alcohol-based activities.
 - A mix of functional and aesthetically pleasing spaces that create an attractive and convenient night-time destination.
- Additionally, should there be a commitment to Purple Flag accreditation?

4. Well-regulated and successful street trading and markets

- Currently, aside from the Thursday Farmers Market the council does not directly operate markets in the city centre.
- It is unclear what outcome this measure is intended to support.

5. Ensuring events and celebrations are well-run and safe

- The role of the Safety Advisory Group is noted, but what about the council's leadership in bringing forward events and celebrations in the city centre?

6. Safe, accessible, and sustainable licensed taxi services

- Ensuring a well-regulated taxi service is essential for accessibility and public safety.

Continued...



Business Voice

InExeter will actively listen, lobby and campaign to make Exeter's business voice heard.



Summary Recommendation

InExeter appreciates the opportunity to contribute to this consultation and welcomes the council's focus on the local economy within its Corporate Strategy. However, for the strategy to deliver meaningful impact, it must go beyond maintaining existing service levels and take a bold, proactive approach to city centre revitalisation, business support, and placemaking.

We strongly recommend that:

- The strategy explicitly acknowledges the critical role of the city centre in driving economic success for Exeter and the wider region.
- There is greater consideration of the interplay between the Corporate Strategy and the Exeter Partnership's objectives to ensure coordinated delivery.
- The council works collaboratively with InExeter to develop a shared set of success measures that go beyond footfall and service delivery metrics.
- Anti-social behaviour is recognised as a key issue within the Local Economy priority, with a clear plan to address business and visitor concerns.
- The long-awaited City Centre Strategy is finalised and prioritised for delivery, with a commitment to investment in public realm improvements, vacancy reduction, and a diverse city centre offer.

Yours Sincerely,

Nicola Wheeler
CEO, InExeter

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Equality Impact Assessment: *Title of 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 8 th July 2025 Council 22 nd July 2025	Corporate Plan 2025 to 2028	<ul style="list-style-type: none"> • To recommend for approval, by Council, the ECC Corporate Plan 2025-2028 and endorse the strategic priorities and intended outcomes outlined in it. • To note the findings from the related consultation report and previous related surveys 	As the Corporate Plan 2025 2028 covers all activities that the Council are responsible for within Exeter, it is likely to impact all groups with protected characteristics in some way. Separate, detailed EQIAs will be completed for initiatives that deliver the plan

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	Medium	<ul style="list-style-type: none"> The Corporate Plan aims to create a thriving, diverse, and resilient city, which includes increasing independent shops and maintaining low levels of empty shops. This can benefit people from different ethnic backgrounds by providing more opportunities for minority-owned businesses. The Exeter Resident Survey 2024 indicates a high level of agreement that people from different ethnic backgrounds get on well together in the local area (72% of all respondents). The plan highlights community building work through partnerships, which have specific initiatives aimed at engaging groups with protected characteristics. It also highlights the community safety partnership, with its focus on anti-social behaviour and hate crime.
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment	Positive	Medium	<ul style="list-style-type: none"> Research commissioned by the Council notes that digital exclusion figures are better than the national average, with up to

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Negative	Low	<p>90% of the local population likely to experience no barriers. However, it also highlights that where disability intersects with characteristics such as age and /or income these barriers to digital inclusion may increase. The Digital Customer Strategy and outcomes of the grants programme aim to address these barriers. In addition, the Corporate Plan highlights a commitment to face to face services for those who need them</p> <ul style="list-style-type: none"> • Consultation highlighted concerns about the accessibility of public transport and cycling routes. Additionally, the pressure on existing facilities like hospitals and GP services due to increased housing development may negatively impact people with disabilities
Sex/Gender	Positive	Medium	<ul style="list-style-type: none"> • Through the Residents Survey and Corporate Priorities consultation, safety concerns, particularly at night, were highlighted, especially for women. The plan highlights work to address this through the Community Safety Partnership.
Gender reassignment	Positive	Low	<ul style="list-style-type: none"> • The Corporate Plan's emphasis on inclusivity and community resilience can positively impact individuals undergoing gender reassignment by fostering a more accepting and supportive environment
Religion and belief (include no belief, some philosophical beliefs such as Buddhism and sects within religions).	Positive	Low	<ul style="list-style-type: none"> • The plan's focus on creating a vibrant cultural and tourism offer can benefit people of different religions and beliefs by providing more opportunities for cultural expression and engagement
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Positive	Low	<ul style="list-style-type: none"> • The Corporate Plan's emphasis on inclusivity and community resilience can positively impact individuals of different sexual orientations by fostering a more accepting and supportive environment

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	Medium	<ul style="list-style-type: none"> The plan aims to provide better quality, energy-efficient, and more affordable homes, which can benefit older adults and children by providing suitable housing. The Digital Customer Strategy addresses digital exclusion, which is particularly relevant for older adults who may be at greater risk of exclusion, according to research commissioned by the Council. There is also a commitment to face to face services for those who need them, although perceptions may be that the Council is moving towards a Digital only approach.
	Negative	High	<ul style="list-style-type: none"> Safety concerns, particularly at night, were highlighted through consultation, especially for older adults. Additionally, there were also concerns about pressure on existing facilities like hospitals and GP services due to increased housing development may negatively impact older adults
Pregnancy and maternity including new and breast-feeding mothers	Positive	Low	<ul style="list-style-type: none"> The plan's focus on providing better quality, energy-efficient, and more affordable homes may benefit pregnant women and new mothers by providing more suitable housing. The emphasis on reducing health inequalities may also impact maternal health
Marriage and civil partnership status	Neutral		<ul style="list-style-type: none"> The Corporate Plan does not specifically address issues related to marriage and civil partnership, but the overall focus on inclusivity and community resilience can indirectly benefit individuals in these categories

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

The Corporate Plan 2025 to 2028 will be delivered through various projects, initiative and policy decisions. Each of these will have its own individual EQIA to assess the specific impacts. However, in general, the following actions will help to mitigate any potential negative impacts related to the plan.

1. **Develop and implement an EDI Action Plan:** Create a comprehensive Equality, Diversity, and Inclusion (EDI) action plan to address and monitor equality impacts across all activities
2. **Partnership Working:** Collaborate effectively with groups such as the Exeter Partnership to ensure a shared understanding and implementation of best practices in equality. This includes activities related to developing infrastructure, promoting and delivering services, and supporting communities through specific programmes like Wellbeing Exeter.
3. **Digital Inclusion:** Implement strategies to address digital exclusion, providing training and support to access digital services, including as an intended outcome of the Community Grants Program
4. **Safety Measures:** Address gender related impacts relating to safety to inform work with partners across the community safety partnership
5. **Training and Awareness:** Provide training for staff on equality and diversity to ensure they are aware of the needs of different groups and can implement the plan effectively
6. **Continuous Monitoring:** Regularly review the implementation of the plan to ensure it effectively addresses the needs of all groups
7. **Stakeholder Engagement:** Engage with representatives to gather feedback and inform the delivery of the plan

Officer: Stephen Clayton

Date: 19/05/2025

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REPORT TO COUNCIL

Date of Meeting: 22 July 2025

Report of: Chief Executive

Title: Request for a non-recurring budget to support organisational transformation and efficiency.

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

This report seeks agreement from Members to create a two-year, non-recurring budget from reserves to support the council's organisational transformation and efficiency programme of work. As well as transforming the way the council operates it will also help to ensure that the council leaves a legacy of well-run public services following Local Government Reorganisation (LGR).

2. Recommendations:

It is recommended that Council approves a one-off budget of £800,000 to be spent over the next two years as set out in Appendix A in order to support the council's organisational transformation and efficiency work programme. The budget will be funded from reserves.

3. Reasons for the recommendation:

The key reasons for making this recommendation are set out below;

- The delivery of our Digital Customer Strategy requires total transformation of our operating model.
- Infrastructure investments have been made within the Strata business plan to enable us to utilise new ways of working but the council will need to invest to make full use of the new systems that are available.
- AI and digital technologies are developing at unprecedented pace, and we need to upskill our staff to deliver benefits for residents and the organisation.
- The Senior Leadership Structure and the HR Improvement Plan are delivering significant change for the organisation which we must build on.
- LGR provides a further impetus for increasing the pace at which we transform so that we leave a legacy of public services in the best possible position: delivering the goals in the Corporate Plan are critical to the credibility of the leadership which will be under even greater scrutiny as the public becomes engaged with the LGR process.
- Investing in skills, learning, development and digital and AI knowledge over the next 2 years is critical to ensuring there is a work force with the capability to deliver digital

services and the long term efficiencies needed to achieve financial balance and a well-run council requires.

4. What are the resource implications including non financial resources

The creation of this additional budget will ensure that the council is adequately resourced to deliver its organisational transformation and efficiency programme of work, which is essential to delivering the long-term reductions required to balance the budget.

The £800,000 is available from an earmarked reserve which was approved to pay compensation to businesses affected by the sale of Mary Arches Street car park. Due to the Guildhall Shopping Centre performing better than predicted, this excess budget was used to pay the compensation. This has resulted in the earmarked reserve being returned to the general fund balance.

5. Section 151 Officer comments:

This funding has become available as a result of the strong financial performance of the Guildhall Shopping Centre, which can be used to fund initiatives in support of regeneration and new housing. As Councillors are aware, the resetting of the business rates retention scheme by Central Government means significant reductions in spend will be required over the next three years. The proposal here is essential to enable the Council to invest to deliver the ongoing reductions required to deliver financial stability. If approved the year 2 funds will be transferred to the Transformation Fund earmarked reserve.

6. What are the legal aspects?

The Local Government Act 2000 requires all expenditure to be approved by Full Council.

Legislation does not prescribe how much the minimum level of reserves should be. The section 151 officer is tasked with recommending the minimum level of reserves required as part of the budget setting process having regard to elements of risk in the Council's finances. Section 25 of the Local Government Act 2003 requires the section 151 officer to report on the adequacy of the Council's financial resource.

The transfer of funds from the general fund balance for the purposes set out in this report is a function of the full council.

7. Monitoring Officer's comments:

The £800k originally set aside for Mary Arches St car park has been returned to the General Fund balance as it was no longer required. Instead, the cost of compensation to businesses affected by the sale of Mary Arches car park is being met from the Guildhall Shopping Centre surplus as a legitimate use of the surplus to support regeneration and housing initiatives.

This has the impact of enabling £800k from the General Fund balance to be set aside in an earmarked reserve for the Transformation Fund.

8. Report details:

The council is going through a period of significant change. In addition to the work that will be required to transition to a new authority as part of LGR, there is also a need to invest in the council's staff and ICT infrastructure to ensure that the council can take advantage of digital technology and continue to deliver well-run services for its customers and residents

A summary of key areas of work that will be delivered are set out below:

- **Learning and Development** – proposed establishment of a Learning and Development Manager role to help build a capable, agile and future ready workforce. This will include leadership and management development, apprenticeships, mandatory compliance training and a review of the Learning Management System.
- **Corporate Health and Safety Training** – an independent review has highlighted the need for a re-launch of health and safety at work policy and practice.
- **Rapid Impact Team** – this is a multi-disciplinary team consisting of officers and consultants that review how we currently deliver services. The review identifies improvements to service delivery that results in financial efficiencies and accelerated digital transformation. The intention is to roll this out across all of the council's key services.
- **Customer Digital Strategy** – the pace of technological advances is accelerating. The Strata Business Plan will deliver the infrastructure to enable us to transform but there is a requirement to bring in temporary staff with the skills to implement new systems and develop AI and low code digital skills across the workforce.
- **Project Management** – to provide skilled capacity to project manage delivery of the change programmes.

The full programme of work, including a breakdown of costs is set out in Appendix A.

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

This decision will contribute to the council's priority of delivering a well-run council.

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

Without investment in staff and ICT infrastructure, there is a serious risk that the council's workforce will not have the capability to deliver the digital services and long-term efficiencies needed to achieve the financial balance that a well-run council deserves. It is also crucial that the council leaves a legacy of well-run public services to transition to the new authority after the completion of LGR.

Implementation of this programme of work will reduce these risks significantly.

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 at this stage. Equalities Impact Assessments will be undertaken, when necessary, as part of the project development process.

12. Carbon Footprint (Environmental) Implications:

The recommendation in this report will have positive impact on the council's carbon footprint.

- Travel – enabling customers to access our services online will reduce the need for customers to travel to the city centre to access services.
- Waste - there will be a reduction in paper usage as more services and application processes are available online
- Processes – improved processes and procedures will help to reduce the energy consumed to deliver services

13. Are there any other options?

The alternative option is to continue as is. However, without investment, the speed at which the council can deliver against the priority of leading a well-run council will be significantly delayed.

Director: Bindu Arjoon, Chief Executive

Author: Lorraine Betts, Executive Office Manager

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

Background papers used in compiling this report:-

None

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Organisational Transformation and Efficiency Programme		
Learning and Development (L&D)	2025/26	2026/27
To build a capable, agile and future ready workforce it is essential for the council to invest in structured learning and development. Over the last 6-12 months there has been much progression with the HR Improvement Plan which aims to turn the HR reactive service to a proactive insight led function supporting the organisation with achieving its strategic plan and One Council delivery model. Many aspects of the plan have a focus on L&D; Leadership Development, Management development, Performance and Development Reviews and Supervision, Apprenticeships, mandatory compliance training and review of the Learning Management System. To fully deliver these objectives and ensure the benefits are sustained in the long run there is a clear business case for the establishment of a Learning and Development Manager role, to lead, maintain and develop the L&D initiatives going forward alongside a budget to commission L&D.	£50,000	£100,000
Corporate Health and Safety Training and development. An independent review has highlighted the need for a re-launch of health and safety at work policy and practice. This short-term budget will allow for enhanced training and development for targeted staff under the leadership of the Corporate Health and Safety Manager	£30,000	£40,000
Rapid Impact Team (RIT) Pilot roll out in key service areas to deliver financial efficiencies and speed up digital transformation	£40,000	£60,000
Customer Digital Strategy: developing AI and low code digital skills across the workforce. The pace of technological advances is accelerating; the Strata business plan will deliver the infrastructure to enable us to transform but we need to bring in temporary staff with the skills to implement new systems and to train existing staff to ensure a skills legacy: linked to delivering outputs from RIT	£100,000	£200,000
Project Management to provide skilled capacity to project manage delivery of the change programmes	£60,000	£120,000
Sub-Total	£280,000	£520,000
Total		£800,000

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REPORT TO EXECUTIVE

Date of Meeting: 8 July 2025

Report of: Strategic Director for Place of City Development

Title: South East Devon Wildlife – Joint Habitats Sites Mitigation Strategy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

- 1.1 Three sites in south east Devon, the Exe Estuary, the East Devon Pebblebed Heaths and Dawlish Warren fall into the highest tier of protected wildlife sites in the UK. In the absence of mitigation from development impact, Habitats Regulations Assessment work has shown that unacceptable adverse impacts would arise at these sites on account of recreational pressure and this would be reason to not allow development to go ahead. East Devon District Council, Teignbridge District Council and Exeter City Council have been working successfully in partnership since the early 2010s to define and deliver mitigation measures. This approach has enabled development to progress effectively across the area alongside key green infrastructure improvements. The mitigation is funded from the Community Infrastructure Levy and developer contributions.
- 1.2 In 2014 a mitigation strategy was approved by the three local authority partners and this has led to an extensive range of measures being implemented that have successfully ensured new development can go ahead across Exeter and the wider area. We have now reached a point where we need a new mitigation strategy, which is appended to this report. Endorsement is being sought from the three constituent local authorities (East Devon, Exeter and Teignbridge) for the new strategy to ensure that effective and coordinated mitigation can be implemented in the period from 2025 to 2030. Endorsement is vital to enable continued development to meet the needs of the community and to support the smooth progress of local plans, including the Exeter Plan.
- 1.3 This report has been produced jointly by officers of the three authorities and is being replicated for each council, with edits to accord with differing report templates used by the separate councils and local circumstances. Initial agreement has already been secured from East Devon and Teignbridge Councils through their Committee processes.

2. Recommendations:

- 2.1 That the Executive recommends that Council approves the adoption of the South East Devon Wildlife Joint Habitats Sites Mitigation Strategy 2025 – 2030 attached at Appendix A.

3. Reasons for the recommendation:

- 3.1 To ensure that we have a robust joint mitigation strategy in place so that the collective and cumulative impacts from new development can be mitigated in the most effective and efficient manner. Without the strategy, housing development in large parts of the city would not be able to go ahead and the progress of the Exeter Plan could be affected.

4. What are the resource implications including non financial resources

- 4.1 The work of preparing the Strategy has been funded jointly by the partner authorities from monies remaining from the former Greater Exeter Strategic Plan budget. Future work will be undertaken by officers. As a result, there are no budget implications. For clarity, the mitigation measures included in the current and new habitat mitigation strategy are funded by development through a combination of Community Infrastructure Levy and development contributions.

5. Section 151 Officer comments:

- 5.1 There are no additional financial implications for Council to consider outside of the normal contributions from Development.

6. What are the legal aspects?

- 6.1 The designation, protection and restoration of habitats sites is set out in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. This strategy has been produced in order to meet the legislative requirements of the Habitats Regulations.

Failure to adopt the new strategy would leave the Council without the ability to mitigate the risk of harm from housing development on designated wildlife sites. It would also expose proposed housing developments to delays or legal challenges and undermine the forthcoming Exeter Plan.

7. Monitoring Officer's comments:

- 7.1 The Joint Habitats Sites Mitigation Strategy 2025-2030 establishes a framework for mitigating the cumulative impacts of development on local designated wildlife sites.

The strategy will continue to operate through the established joint Habitats Mitigation Executive Committee (HMEC) with neighbouring East Devon District Council and Teignbridge District Council. It is intended that this will provide effective and transparent oversight of the allocation of contributions, monitoring the implementation of mitigation measures and management of other resources.

The strategy will also form part of the necessary evidence base to be used for the examination of the Exeter Plan and that of neighbouring authorities.

8. Report details:

Need for a mitigation strategy

- 8.1 Plans and projects that may adversely impact on European sites, (the highest tier of wildlife sites in the UK and across member states of the European Union), need to be subject to assessment under the Habitat Regulations.
- 8.2 In south east Devon there are three specific designated sites where the impacts of new built development (particularly new housing development), as set out in local plans, has the potential to result in adverse impacts. The designated wildlife sites are:
- The Exe Estuary - Special Protection Area/Ramsar.
 - Dawlish Warren - Special Area of Conservation.
 - The East Devon Pebblebed Heaths - Special Area of Conservation and Special Protection Area.
- 8.3 Parts of the Exe Estuary fall within administrative areas of East Devon, Teignbridge and Exeter. Dawlish Warren, in Teignbridge, abuts the Estuary and the Pebblebed Heaths, in East Devon, lie close by and to the east of the Estuary.
- 8.4 Special Protection Areas (SPAs) are important for rare and vulnerable birds because they rely on them for breeding, feeding, wintering or on migration. Special Areas of Conservation (SACs) are designated to conserve natural habitats and species that are under serious threat. Rare and vulnerable animals, plants and habitats have increased protection and management objectives within these sites.
- 8.5 Previous assessment work undertaken for the three local planning authorities has identified that adverse impacts would arise from development if not mitigated. Government guidance on assessment under the Habitat Regulations can be found at: [Habitats regulations assessments: protecting a European site - GOV.UK](#)
- 8.6 The adverse impacts arise because of the people living in new homes built within a ten-kilometre catchment of the designated sites, accessing and using the designated sites for recreational purposes and such use leading to unacceptable negative impacts. The concern also applies to some tourism accommodation and may be applicable for other built uses. To allow development to go ahead it has been established that mitigation measures need to be delivered, funded by development. As the sites lie near one another, and the catchment areas for differing sites cross local authority boundaries, it has been deemed appropriate and desirable for the three local authorities to work in partnership on understanding and providing solutions to allow development to go ahead.

South East Devon Wildlife and the existing strategy

- 8.7 The joint approach to mitigation delivery is being successfully implemented under the umbrella of the joint local authority organisation - 'South East Devon Wildlife', for more information see: [South East Devon Wildlife](#). The joint mitigation approach was first agreed on the strength of the initial mitigation strategy: [env-011-south-east-devon-european-site-mitigation-strategy-2014.pdf](#). The current strategy and the partnership approach has the support of Natural England.

- 8.8 The existing joint mitigation strategy has led to a range of projects and initiatives being implemented to ensure that development that would otherwise lead to adverse impacts can go ahead. The measures are funded by development. South East Devon Wildlife has a staff resource, hosted by East Devon District Council and funded by development via the joint mitigation strategy, that undertakes and coordinates delivery and they work with a range of partners and volunteers including Natural England, the Pebblebed Conservation Trust, Devon Wildlife Trust, the RSPB, the Exe Estuary Partnership and officers and teams of the constituent local authorities themselves. Notable successes have been the provision of new Suitable Alternative Natural Greenspace – publicly accessible open space which takes visitor pressure from the protected habitats and provide greater opportunity for recreation.
- 8.9 It should be noted that the joint mitigation strategy allows for development projects to go ahead without detailed bespoke work under the Habitat Regulations being undertaken. The strategic approach simplifies matters for developers, but development project specific assessment and mitigation could come forward outside of the joint strategic approach.

The new mitigation strategy

- 8.10 Whilst the existing strategy has ensured that successful mitigation has been delivered to date, all of the constituent local authorities have new local plans in production. As these plans set out new housing delivery requirements a new joint mitigation strategy is required. Collective agreement was reached on commissioning a new strategy and through joint officer working and engagement with partners and stakeholders the new strategy has been completed and approval from the three local authorities is now sought for its adoption.
- 8.11 The new strategy is included at Appendix A.

The new strategy compared to the existing version

- 8.12 The new strategy will replace and supersede the existing strategy and builds on the work done to date, rolling much of this forward. The explanation below contrasts key aspects of the new strategy with the existing so that changes and evolution in thinking can be noted.
- 8.13 As a starting point it is important to understand the scale of development that new local plans are providing for and which needs to be mitigated; it is a very significant level of development and in the absence of mitigation the new Local Plans could fail to be adopted. In the period from 2025 to 2040 (i.e. a period that extends beyond the strategy life of 2030, the three local authorities, within the 10-kilometre catchment, are predicting completion of around 29,100 new homes, that is approximately 2,000 per year.
- 8.14 Mitigation to be provided under the new strategy will take the form of:
- **Onsite site** mitigation measures– management and access measures and activities which take place at the designated sites, with wardens and other

officers to help operate and run these and positively engage with site users. These on-site activities go under the heading of Strategic Access Management and Monitoring (SAMM) measures.

- **Offsite mitigation measures** – these occur off or away from the designated site – most notable is the provision of what are termed as Suitable Alternative Natural Greenspaces (SANGs). These are new or enhanced green spaces used for recreation purposes that will provide an alternative (alternative to the designated sites) area for recreational activity. By drawing in users SANGs will reduce use/pressure on designated sites. The new strategy also provides for the delivery of range of discrete projects aimed at enhancing existing access and tailored to local needs and specific circumstance.

- 8.15 Some of the measures that are implemented are shorter term and others longer, notably the SANGs are longer term initiatives.
- 8.16 The new strategy covers the five years from 2025 to 2030. It is envisaged that it will need reviewing on a rolling 5-year basis, i.e. an update will be needed in 2030. In addition, the Government have highlighted possible regime changes to the way that mitigation at and for designated wildlife sites may be delivered - under the Planning and Infrastructure Bill amendments to Habitats Regulations (Nature Restoration Fund). With an onus on Government agencies taking a more fundamental lead role.
- 8.17 Under the new strategy there will be an increase in the staff resource to secure mitigation. The existing wardens are under very high and demanding workloads and safety considerations place constraints and limitations on the work they do and the way they work and the coverage they provide. The wardens deliver a very high quality and highly committed customer focussed service, but expansion of the staff resource is needed given the new and increasing pressures the sites face. Additional staff resource will be funded by development via the new strategy.
- 8.18 There is also a newly created green space project officer post noting that identification of sites for SANGs, and securing their implementation and delivery, has been a major challenge and has drawn on considerable amounts of officer time at the authorities. The new post will ensure this crucial part of the work gets the dedicated staff resource that is essential. The new strategy, to complement SANGs, also provides for improvements to promote access and enhance existing land away from the European sites. Such works will need to show that they reduce use and pressure on the designated wildlife sites. There is also, new for this strategy, a flexible “special projects pot” funding for site specific mitigation identified as appropriate and desirable; this flexible pot will complement and work with defined specific projects in the strategy.
- 8.19 To pay for mitigation measures contributions are sought from new housing developments on a per dwelling basis, and under the new strategy are likely to increase. The changes reflect a general increase in costs but also, and more importantly, the original strategy was written and costed without the full benefit of, and practical realisation, of the scale of costs involved. Many of these costs have proved to be substantially higher than the original cost estimates, especially when on-

going and longer-term maintenance and management costs are factored into initial capital costings. Further work is continuing to establish the new per dwelling contribution that will be needed to cover strategy costs.

Next steps for implementation of the new strategy

- 8.20 Whilst this report summarises and seeks approval for the new strategy it does not specify per dwelling contributions that will need to be sought or recommend a specific start date. A further report is planned once more details are agreed. The expectation and intent is, however, that all authorities will agree per dwelling contributions and a date when the new strategy will come in to effect and at that point actions and charges will be based on the new strategy and the older one will be retired.
- 8.21 Final decisions on detail and timing of actions on mitigation will remain to be determined through the existing, formally constituted joint committee (the South East Devon Habitat Mitigation Executive Committee (HMEC)) that will continue to run, as has been the case and approach for several years. There is the potential for improvements to be made to existing green infrastructure assets such as some of the Valley Parks within the City Council boundary through the follow-up work to the new mitigation strategy.
- 8.22 The new strategy, as well as setting out the delivery of mitigation, will give planning inspectors, at local plan examination, evidence that mitigation can and will be delivered and therefore that plans are sound and robust in their make-up in this respect.
- 8.23 It should be noted that the need for habitat mitigation measures addresses only the impacts of development on the habitats with the highest level of environmental protection. The related need for biodiversity net gain places separate requirements onto development.
- 9. How does the decision contribute to the Council's Corporate Plan?**
- 9.1 The Joint Habitats Sites Mitigation Strategy, will be important in ensuring the delivery of objectives in the Council's Corporate Plan. Specifically delivering the strategic priorities of 'Housing and building great neighbourhoods and communities'.
- 10. What risks are there and how can they be reduced?**
- 10.1 East Devon District Council, Teignbridge District Council and Exeter City Council all need to approve the new Strategy. To mitigate the risk that this does not occur each Council will continue to work in partnership. It should be noted that the new Strategy has already been approved by the initial stages of the Committee process for the other two Councils.
- 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 the adoption of the Strategy, no potential impact has been identified on people with protected characteristics as determined by the Act. However, the new strategy could lead to benefits for some groups who are less economically advantaged if, in future, improvements are made to local areas of open space through the new mitigation strategy because such areas may be less likely to require access by car. See attached Equalities Impact Assessment.

12. Carbon Footprint (Environmental) Implications:

- 12.1 The Strategy ensures sites of exceptional nature conservation importance are adequately protected when permitting development.

13. Are there any other options?

- 13.1 We could continue to utilise the existing Strategy, but this would not reflect the new levels of housing proposed and therefore may not provide adequate mitigation to meet the legislative requirements.

Strategic Director for Place, Ian Collinson

Author: Jill Day, Principal Project manager (Local Plans)

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

Background papers used in compiling this report:

The current South East Devon European Site Mitigation Strategy

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South East Devon Wildlife – Joint Habitats Sites Mitigation Strategy (2024)

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Summary

This strategy sets out the mitigation requirements relating to impacts from recreation (associated with new housing and tourism development) on the Exe Estuary Special Protection Area (SPA)/Ramsar site, Dawlish Warren Special Area of Conservation (SAC) and the East Devon Pebblebed Heaths SAC/East Devon Heaths SPA. These are sites of exceptional nature conservation importance, and the strategy ensures the relevant local authorities (East Devon District Council, Exeter City Council and Teignbridge District Council) meet legislative requirements and adequately protect the sites when permitting development.

This strategy will replace and supercede the previous strategy (established in 2014). New housing (within 10km of the European sites) is anticipated at around 2,000 new dwellings per annum over the period 2025-2030, and this update ensures the level of mitigation is appropriate to the level of growth anticipated. Mitigation measures are set out in detail and comprise:

- SAMMS (Strategic Access Management and Monitoring); and
- Off-site infrastructure (including SANGs – ‘Suitable Alternative Natural Greenspace’ and local projects).

This strategy covers the period 2025-2030 and will be updated on a rolling basis every 5 years, providing the opportunity to check the mitigation, scale of growth and update any costs. As such the strategy provides a long-term solution to recreation impacts. By addressing risks up front, the strategy provides a proactive, cross-boundary solution that ensures cumulative impacts of growth are taken into account. The strategy ensures necessary resources and costs are identified and provides clarity for developers when bringing forward sites for development.

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1. Introduction

- 1.1 This strategy primarily relates to housing growth in the South East Devon area. It covers the period 2025-2030 and sets out the mitigation requirements relating to the impacts from recreation on the important nature conservation sites. It ensures that East Devon District Council, Exeter City Council and Teignbridge District Council are adequately protecting the relevant wildlife sites from the impacts of recreation while also ensuring that housing is not delayed. The strategy provides clarity for developers when bringing forward sites for development.

Background

- 1.2 The Exe Estuary, Dawlish Warren and the East Devon Heaths are three sites of exceptional nature conservation importance that are covered by several international designations. Located close to Exeter, the sites are adjacent to a large human population and are popular sites for recreation. Urban development in the vicinity of the sites and increasing recreation use brings particular risks. This strategy addresses these risks, ensuring local planning authorities meet legislative requirements when permitting housing development. By addressing risks up front, the strategy provides a proactive, cross-boundary solution that ensures cumulative impacts of growth are taken into account and that the necessary resources and costs are identified.
- 1.3 A strategic approach to mitigation was established in 2014, developed with partnership working between East Devon, Exeter City and Teignbridge local planning authorities, with input from a number of wider organisations involved in the protection and management of the three European sites. The 2014 strategy set out a zone of influence (i.e. the evidence based zone within which it is deemed that mitigation measures are required) and a series of mitigation measures that work together to provide robust protection for the three European sites. The strategic approach was planned to run over the lifetime of the relevant Local Plans, and then beyond as a continual rolling programme, but with interim reviews. Since 2014, the strategy has been progressed by the three local planning authorities and dedicated staff are in place to facilitate implementation. There has been some very positive delivery of measures, and some aspects of mitigation have inevitably been identified as needing refinement.

- 1.4 A review and update of the mitigation strategy is necessary to ensure continued protection for the relevant European sites and to ensure the strategy is appropriate to the level of growth coming forward in the relevant Local Plans.

Legislative context

- 1.5 This strategy has been produced in order to meet particular legislative requirements. Habitats sites are those afforded the highest level of legislative protection for biodiversity. Public bodies, including local planning authorities, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For local planning authorities, this means that the combined effect of individual development proposals needs to be assessed collectively for their cumulative impact.
- 1.6 The designation, protection and restoration of habitats sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the ‘Habitats Regulations’. They include Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive¹. In addition, Ramsar sites are afforded the same level of protection as habitats sites, through long-established Government policy². In this strategy we use the term ‘European site’ to refer to both habitats sites and Ramsar sites.

¹ For the avoidance of doubt, the list of statutory European sites also comprises: A site submitted by the UK to the European Commission (EC) before Exit Day (a candidate SAC or cSAC) as eligible for selection as a Site of Community Importance (SCI) but not yet entered on the ECs list of SCI, until such time as the Appropriate Authority has designated the site or it has notified the statutory nature conservation body that it does not intend to designate the site. After Exit Day, no further cSACs will be submitted to the EU. Statutory European sites also include SCI included on a list of such sites by the European Commission from cSACs submitted by the UK before the UK left the EU, until such time as the UK designates the site when it will become a fully designated SAC.

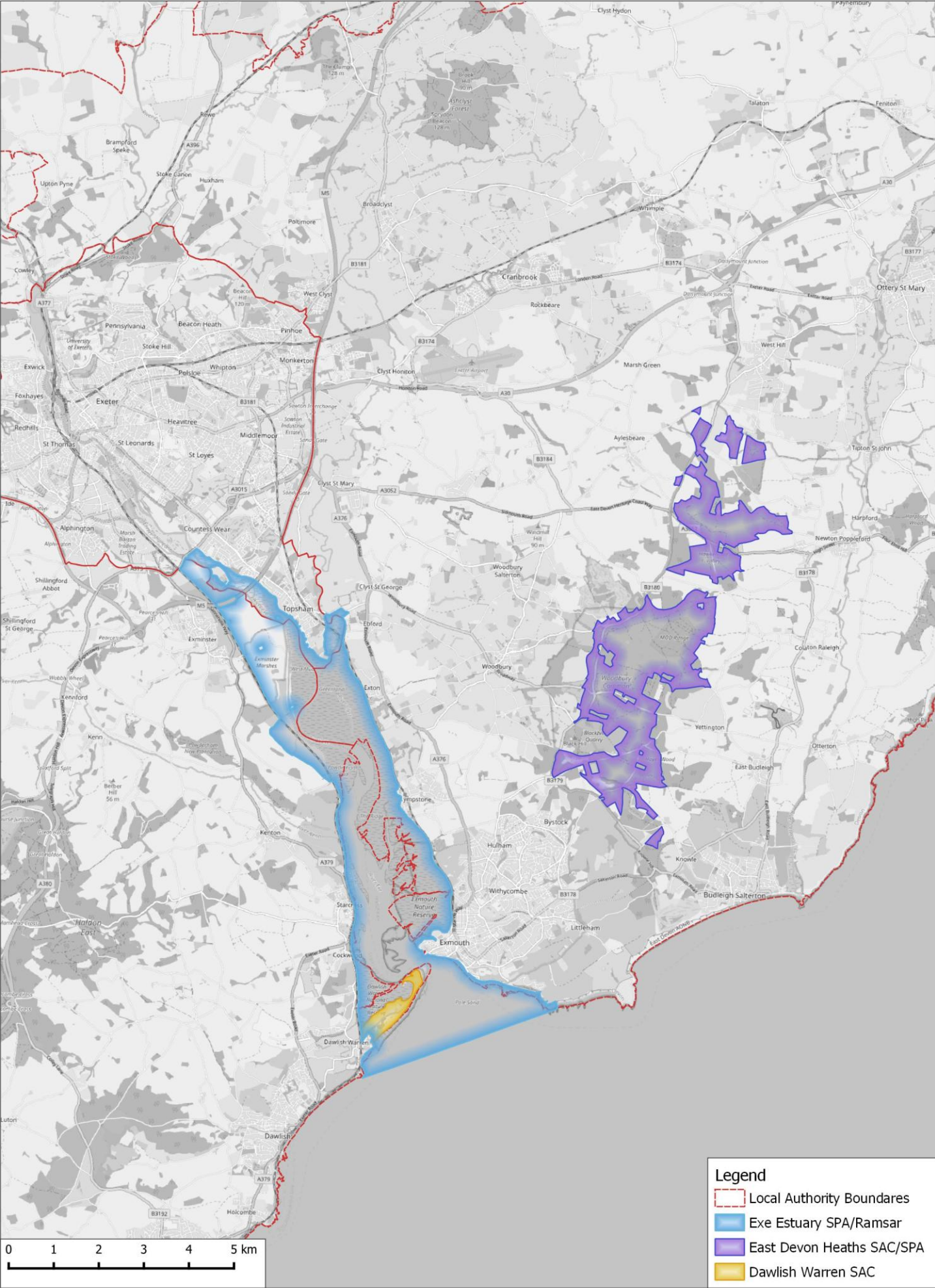
² ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005), to be read in conjunction with the current NPPF, other Government guidance and the current version of the Habitats Regulations.

- 1.7 European sites are the cornerstone of UK nature conservation policy. Each forms part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. Public bodies are referred to as 'competent authorities' within the legislation. The duties set out within the Habitats Regulations in relation to the consideration of plans and projects are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so.
- 1.8 The legislation is founded on the 'precautionary principle' and it is necessary to rule out harm, rather than demonstrate impacts. Assessment (Habitats Regulations Assessment) requires consideration of effects either alone or in-combination, and this strategy therefore relates to the cumulative effects of plan-led development across the combined authorities.

Relevant European Sites

- 1.9 This strategy is focussed on three European sites lying in close proximity towards the south of Exeter (Map 1). These relevant European sites are:
- The Exe Estuary SPA/Ramsar site
 - Dawlish Warren SAC
 - The East Devon Pebblebed Heaths SPA/SAC.

Map 1: European sites



The Exe Estuary

- 1.10 The Exe estuary is of international importance for wintering and migratory wetland birds which use the intertidal sand and mud flats and associated saltmarshes, reedbeds and grazing marshes.
- 1.11 The Estuary is classified as an SPA for the following non-breeding birds:
- Grey Plover *Pluvialis squatarola*,
 - Dark-bellied Brent Goose *Branta bernicla bernicla*,
 - Pied Avocet *Recurvirostra avosetta*,
 - Black-Tailed Godwit *Limosa limosa islandica*,
 - Dunlin *Calidris alpina alpina*,
 - Slavonian Grebe *Podiceps auritus*,
 - Eurasian Oystercatcher *Haematopus ostralegus*,
 - And in addition for the wintering waterbird assemblage.
- 1.12 The estuary is also a Ramsar site, listed for the following:
- Assemblage of international importance (under criterion 5); wintering waterfowl assemblage
 - *Branta bernicla bernicla* Dark-bellied Brent Goose (under criterion 6)
- 1.13 The SPA and Ramsar have the same boundaries and cover some 2,345.71ha. Full details of the SPA and Ramsar can be accessed on the Natural England website³.

Dawlish Warren

- 1.14 Dawlish Warren is a geomorphologically important sand spit which protects the mouth of the Exe estuary. The spit holds a mosaic of sand dune, grassland and wetland habitats and supports several rare plants.
- 1.15 Dawlish Warren is designated as an SAC for:
- H2190 Humid dune slacks;
 - S1395 Petalwort *Petalophyllum ralfsii*
 - H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes");
 - H2130 Fixed dunes with herbaceous vegetation ("grey dunes").

³ See [Natural England website](#)

- 1.16 The SAC (58.84ha) falls within the Exe Estuary SPA and Ramsar. Full details of Dawlish Warren and its interest features can be accessed on the Natural England website⁴.

The East Devon Heaths

- 1.17 The East Devon Heaths form the largest block of lowland heath in Devon, and they are internationally important for the wet and dry heathland habitats present. The diversity of heathland reflects the varied topography, geology, hydrology and water chemistry of the area, and supports associated plant and animal communities. Among the 21 breeding dragonfly species recorded at the site is the southern damselfly and there is an important assemblage of birds, including breeding Nightjar and Dartford Warbler.
- 1.18 The Heaths are designated as an SAC ('The East Devon Pebblebed Heaths SAC') for:
- H4030 European dry heaths;
 - S1044 *Coenagrion mercuriale* Southern damselfly;
 - H4010 Northern Atlantic wet heaths with *Erica tetralix*.
- 1.19 The Heaths are classified as an SPA ('The East Devon Heaths SPA') for
- A302(B) *Sylvia undata* Dartford Warbler;
 - A224(B) *Caprimulgus europaeus* European Nightjar.
- 1.20 The SPA and SAC boundaries are identical and cover 1,119.94ha. We use 'East Devon Heaths SAC/SPA' throughout the strategy to refer to the SAC and SPA together. Conservation objectives, site condition and the relevant citations are available on the Natural England website⁵.

Mitigation to date and need for this update

- 1.21 A strategic and plan led approach to protecting sites from the impact of recreation is now widely recognised as being more effective than dealing with these impacts on a development-by-development basis. Strategic mitigation approaches have been established around the country (for example on the Dorset Heaths, the Thames Basin Heaths, the Solent, the Suffolk Coast, Poole Harbour, the South Pennine Moors, the Chilterns Beechwoods and the Durham Coast). Recreation pressure is complex as the

⁴ See [Natural England website](#)

⁵ See [Natural England website](#)

way visitors use a site can change with time and the distribution of the qualifying features can also change. Furthermore, to ensure effectiveness, mitigation needs to include a package of measures that work together in an integrated way. For example, educating visitors, reinforcing messages with site-based staff, and providing the right infrastructure to meet visitor needs and influence visitor behaviour could all fit together as part of a mitigation package, but are the kinds of measures that cannot be delivered in a piecemeal way, implemented by individual developments.

- 1.22 Collective funding is essential for on-site measures, and these are then in turn supported by the provision of the right alternative green infrastructure to make a meaningful reduction in visits to the European sites.
- 1.23 A strategic approach also ensures that mitigation can be secured in a way to maximise benefits for local communities and wildlife, ensuring a positive approach that provides for recreation use and ensures long-term protection for the European sites.
- 1.24 A strategic mitigation approach was first established in South East Devon 2014 through the initial South East Devon Joint Mitigation Strategy (Liley *et al.*, 2014). This strategy included mitigation measures relating to the Exeter Core Strategy, the East Devon Local Plan and the Teignbridge District Local Plan, which then proposed a total level of housing growth of around 40,000 new homes (over the period 2006-2026 for East Devon and Exeter City and 2013-2033 for Teignbridge District).
- 1.25 Mitigation measures have been funded by developer contributions, with contributions required from many types of residential and tourist accommodation⁶. The three local authorities used a combination of Community Infrastructure Levy (CIL) and Section 106/111 to secure the funding.
- 1.26 Whilst approval of the overall Strategy rests with respective Councils, decision making powers to deliver the Strategy have been delegated to the South and East Devon Habitat Regulations Executive Committee. The Committee's responsibilities include: agreeing a 5-year programme of

⁶ For example, including: all houses and flats (but not extensions), affordable housing, tied accommodation, student housing (with the exception of purpose built accommodation in Exeter), housing for the 'mobile' elderly, hotels, B&Bs and static caravans. Care homes for the infirmed who have significantly reduced mobility have been excluded.

mitigation and monitoring, an annual business plan, budget allocation, stakeholder cooperation and securing complementary funding.

- 1.27 This strategy will replace and supercede the previous strategy. It covers the period 2025-2030 and brings the relevant mitigation requirements, contributions and approach up to date with the housing growth now coming forward in the relevant authorities. It has been brought together with the involvement of a wide range of stakeholders, through a series of workshops and meetings.

2. Impacts of development

- 2.1 Impacts of development and the particular risks to the relevant European sites are discussed in detail in a range of previous reports (see Lake, 2010; Liley *et al.*, 2014; Liley, Panter and Underhill-Day, 2016) and are summarised here in Table 1. This strategy focuses on the cumulative effects of housing growth in terms of recreation impacts. It does not address other impacts from plan-led growth, for example impacts associated with air quality or water quality, which are beyond the scope of this strategy.
- 2.2 It should be noted there is uncertainty around the scale of potential impacts, given the length of time the development will last and factors such as climate change which are likely to impact the distribution of the qualifying features, exacerbate risks such as fire incidence, change recreation patterns and fundamentally change the coast and surrounding habitats. The legislation requires the Local Planning Authorities to be able to rule out harm, and the strategy provides a means to address such uncertainty.

Table 1: Summary of risks to the relevant European sites from recreation and urban effects

Impact	Exe Estuary SPA/Ramsar	Dawlish Warren SAC	East Devon Heaths SPA/SAC	Notes	References and examples
Disturbance to breeding birds			✓	Risks from reduced breeding success and avoidance of otherwise suitable habitat.	Murison (2002); Liley & Clarke (2003); Murison <i>et al.</i> (2007).
Disturbance to wintering waterbirds	✓			Risks from avoidance of otherwise suitable areas, reduced feeding rate, stress and increased energetic costs.	Goss-Custard & Verboven (1993); Stillman <i>et al.</i> (2001); West <i>et al.</i> (2002); Liley <i>et al.</i> (2011)
Increased fire risk		✓	✓	Fire risk linked to recreation through discarded cigarettes, BBQs etc.	Kirby & Tantram (1999); Lake (2010)
Trampling and wear		✓	✓	Heavy footfall can result in vegetation wear, soil compaction & erosion.	Lowen <i>et al.</i> (2008); Lake (2010)
Interaction with predators	?		✓	Species such as Crows and Magpies may be drawn to areas with greater human activity or occur at higher densities; redistribution of birds may result in greater vulnerability to predation.	Marzluff & Neatherlin (2006)
Nutrient enrichment from dog fouling		✓	✓	Risks from dog fouling resulting in increased soil nutrient levels and changes in vegetation.	Bonner & Agnew (1983); Taylor <i>et al.</i> (2005); De Frenne <i>et al.</i> (2022)
Fly tipping/litter		?	✓	Short-term impacts to interest features likely to be minimal but risks of long-term contamination, particularly from introduced species from garden waste a risk. Also risks of staff time drawn from other essential duties.	

Impact	Exe Estuary SPA/Ramsar	Dawlish Warren SAC	East Devon Heaths SPA/SAC	Notes	References and examples
Contamination of water bodies from dogs		✓	✓	Dogs swimming in ponds and other waterbodies brings potential risks from increased turbidity and pollution from flea treatments etc	Groome <i>et al.</i> (2018); Denton & Groome (2017); Perkins <i>et al.</i> (2020)
Disruption of management		✓	✓	Disruption such as dog attacks to livestock; gates left open; theft of equipment/material; all issues to be expected at more urban sites or those with more recreation	
Public opposition/objection to management	✓	✓	✓	Management interventions such as tree or scrub removal, water level management etc. can be sensitive and opposed by local residents, leading to issues achieving the necessary management	Woods (2002)
Damage to infrastructure, vandalism etc.	✓	✓	✓	Direct damage can occur through graffiti and deliberate vandalism which tend to be issues at more urban sites	
Predation by pet cats			✓	Increased housing may lead to increases in local cat population; pet cats can range widely and predate a variety of bird and mammal species. Unlikely as a risk for Exe Estuary?	Hall <i>et al.</i> (2016);

3. Mitigation delivery to date and implications looking forward

Overview

3.1 In this section we consider the potential for the strategy to evolve to address the additional housing levels and consider the wider context that might be relevant in bringing the strategy up to date.

Mitigation delivery to date

3.2 Mitigation to date, in line with the current strategy, has achieved:

- Recruitment of a dedicated Delivery Manager, responsible for implementing the strategy;
- Two wardens: 'Wildlife Wardens' (roles started in October 2016; staff changes / changes to job titles have occurred since) with a dedicated vehicle. The two wardens spoke to over 2,000 people between November 2016 and November 2017⁷ and they have become a familiar sight at the relevant European sites. Their role has been to talk to visitors and engage with those undertaking potentially damaging activities (such as not picking up after their dog). They have done training with the police and are certificated to issue warnings to people about infringements.
- A dedicated website⁸ and social media presence now established including Twitter⁹, Facebook¹⁰ and Instagram¹¹.
- The 'Devon Loves Dogs' project launched in July 2017, with a dog walking code, recommended walks and information for dog walkers. The project has its own website¹² and its own social media presence that includes Facebook¹³, Twitter¹⁴ and Instagram¹⁵

⁷ Figures from Annual Business Plan report, see [minutes of Habitats Mitigation Executive Committee](#) Jan 2018

⁸ <https://www.southeastdevonwildlife.org.uk/>

⁹ See [@SEDwildlife](#), with 858 followers as of December 2022

¹⁰ See <https://www.facebook.com/SEDwildlife/> South East Devon Wildlife with 557 followers as of December 2022

¹¹ See with [sedwildlife](#) 554 followers as of December 2022

¹² <https://www.devonlovesdogs.co.uk/>

¹³ See [Devon Loves Dogs](#) with 1,600 followers as of December 2022

¹⁴ See [@DevonLovesDogs](#) with 515 followers as of December 2022

¹⁵ See [devonlovesdogs](#) with 1,189 followers as of December 2022

- A patrol boat, purchased for use on the Exe Estuary to ensure people remain within the speed limit and follow codes of conduct.
- Wildlife Refuges on the Exe Estuary, near the Duck Pond and at Dawlish Warren, these were subject to a public consultation, have been marked out with buoys and monitoring has been undertaken (Saunders. and Liley, 2021).
- Codes of conduct¹⁶ for the Exe Estuary to help promote a safe and responsible approach to carrying out activities in the area.
- A Pebblebed Heaths Visitor Management Plan, including visitor survey data and recommendations for mitigation measures specific to the East Devon Heaths.
- Pebblebed Heaths visitor access improvements, consisting of a car park strategy, stakeholder and public consultation and a multi-year programme of construction/landscaping spanning the heaths.
- Redesign and installation of new interpretation boards across the Heaths, at each of the main car parks, including car park entrance signage.
- Additional dog bins on the East Devon Heaths at 6 parking areas.
- Provision of SANGs, with Dawlish Countryside Park SANG (26ha) opened to the public in 2017 and other sites including the Ridgetop Park Exeter, Old Park Farm and Pinbrook Country Park. A complete list of current and proposed SANG is provided in Appendix 1.
- Liaison with other strategic mitigation projects, such as Dorset Heaths, Thames Basin Heaths and the Solent, developing links and sharing best practice.
- A visitor survey of the three European sites (Caals, Panter and Liley, 2022)

Commentary on measures in place and opportunities to expand

3.3 From discussion with various parties involved in setting up and running the current Strategy, and a review of information and literature available, the following points are relevant.

Visitor numbers and need for a package of mitigation measures

3.4 Visitor survey results from the European sites in South east Devon have shown a marked increase compared to previous years (Caals, Panter and Liley, 2022). In general, this pattern reflects the national picture, whereby greenspaces in the UK have seen a marked surge in recreation as a result of the Covid pandemic (McGinlay *et al.*, 2020; Burnett *et al.*, 2021; Natural

¹⁶ Available to download from the [Exe Estuary Partnership Website](#)

England and Kantar Public, 2021) and many changes, such as increased dog ownership (Morgan *et al.*, 2020) may have long-lasting effects.

- 3.5 Recreation patterns, in terms of types of activity will also change over time. Wild swimming (Bates and Moles, 2022), paddleboarding (Baker *et al.*, 2021) and e-bikes (Rérat, 2021) are becoming increasingly popular while improvements in wetsuit materials and technology can allow people to spend more time in the water. Such changes may mean people access sites in novel ways, at different times of day or different weather conditions.
- 3.6 In order to ensure resilience in the face of such change and the necessary confidence to conform with the regulations, a range of mitigation measures are likely to be necessary. It is unlikely that any one single intervention will work on its own to address all possible risks.

Climate change

- 3.7 Climate change adds to uncertainty through changes to the estuary and adjacent areas. Dawlish Warren will continue to change with the beach continuing to lower, increasing flood and erosion risk across the estuary. The spit is anticipated to lose its wave barrier function making the estuary less sheltered and more vulnerable to storm events and there is some disagreement about the how site should be managed (see Environment Agency, 2023 for background).
- 3.8 Dawlish Warren holds one of the major wader roosts on the estuary and the changes to the estuary may affect the distribution of birds, availability of roost sites and distribution of food (Clausen and Clausen, 2014). In addition, climate change will affect the distribution of birds and choice of wintering location at a fly-way/regional level (e.g. Maclean *et al.*, 2008).
- 3.9 Climate change is also likely to be a driver of change in recreational use (McEvoy *et al.*, 2008; Coombes and Jones, 2010), for example milder winter weather could lead to increased watersport use.

Functionally linked-land and resilience

- 3.10 There have been some marked changes on and around the estuary in recent years. Both mussel and cockle stocks (a key food for some SPA bird species such as Oystercatcher) have crashed (Morten *et al.*, 2022) and there have been major erosion events at Dawlish Warren. In the context of climate change with more storms and rising sea-levels, the dynamic nature of the coast means that the distribution of birds within the SPA/Ramsar is likely to

shift. Low-lying land around the SPA has the potential to provide safe roost and feeding sites for the bird interest and such functionally-linked land¹⁷ may become more important in the long-term in terms of providing feeding and roost sites.

- 3.11 Facilitating management of these areas and ensuring disturbance is minimised is likely to help relieve pressure on the SPA that may be subjected to changes in key habitats over time. By securing greater habitat capacity outside site boundaries, there can be greater confidence in maintaining the favourable conservation status of the bird interest into the long term.
- 3.12 There is on-going research to understand Oystercatcher movements around the Exe Estuary, and birds have been colour-ringed and some have been fitted with GPS trackers (Morten *et al.*, 2022). Such studies will help to show how birds move around the estuary and identify any key locations outside the SPA that are functionally-linked to the SPA, by providing habitat that is essential to the SPA birds.
- 3.13 As the strategy evolves and as the estuary changes, there may be opportunities to focus on functionally-linked land more. Increasing the resilience of the SPA will contribute towards site conservation objectives and there will be a level at which this should clearly be done in order to meet the maintain and restore duties within the legislation, rather than mitigation. Careful consideration of whether there are additional opportunities that could form part of the strategy warrants further investigation, for example through mapping functionally-linked land. Clear demonstration of additionality will be paramount.

Long-term security

- 3.14 The need for mitigation is likely to last indefinitely. A long-term perspective is clearly important. Proactive work around influencing dog walkers and managing dogs off leads has taken place at Dawlish Warren since the 1970s and the restrictions on dogs beyond groyne 9 on the beach were first instigated in the 1990s (P. Chambers, *pers. comm.*). The need to keep promoting and reinforcing the messaging still remains, highlighting how important it is that measures are implemented for the long-term.

¹⁷ 'Functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. See Chapman & Tyldesley (2016) for further background.

- 3.15 A consistent challenge across this and other European site mitigation strategies has been how best to ensure effective mitigation for the lifetime of the development, particularly when measures involve the management of green infrastructure or employment of staff that need funding on an annual basis. Securing in-perpetuity funding means ring-fencing money for future delivery, yet it can be hard to determine the right amounts to set aside. Clarity on the duration that measures are required for clearly has a major impact on the overall cost of mitigation.
- 3.16 The current mitigation strategy does not include any security in terms of the Delivery Manager's post, which was envisaged to be a 5-year post. Given the continuing need to bring a wide range of stakeholders together, report to the Executive Committee, manage the budget and oversee mitigation delivery, there is scope for this post to be extended. Without this post, there is the risk that the Wildlife Wardens spend less time out on site and are stretched too thinly.
- 3.17 There have also been some delays in delivering mitigation, for example in the case of the purchase of the patrol boat and in establishing the wildlife refuges. Sufficient resources and staff time are necessary to enable measures to happen. As such there is scope for ensuring enough staff and sufficient budget to make sure measures can be implemented. In addition, there needs to be sufficient flexibility to easily redistribute resources to respond to particular circumstances or opportunities.

Wildlife wardens

- 3.18 Wildlife wardens undertake a ranger role as well as undertaking awareness raising work around the sites. They patrol in pairs due to health & safety concerns and while this works well it does mean that spatial coverage is essentially limited. In recent years there have been lengthy periods of time where only one wildlife warden has been in post and this has required other staff (e.g. delivery manager) to join them on patrols at least 1 day per week, taking time away from other duties.
- 3.19 There is clear scope to expand the warden team to provide better coverage. To date, warden time has been split seasonally, with a focus on the Heaths during the spring/summer and the Estuary during the autumn/winter. While this has helped ensure the right focus, the restriction of only being able to cover one place at a time due to staffing and the challenges of organising leave and sickness cover mean the current team of two is stretched.

Furthermore, attendance at events, shows and more public-facing elements, while important in themselves, can mean that time actually on the European sites themselves is further reduced. The travel time and distances also add to the challenges as the estuary makes it harder to switch locations quickly and efficiently (i.e. moving between Dawlish Warren and the East Devon Heaths).

- 3.20 It is perhaps useful to compare other mitigation strategies to check the level of provision. On the Solent (where a mitigation ranger team has been long established), the ranger team has included around 7 staff over the winter (covering some 250km of coast) and the level of annual growth (around 3,400 dwellings), equates to around 30 minutes ranger time per new dwelling per winter (Liley *et al.*, 2023). That figure takes into account the actual time rangers spend out and on the Solent coast, and the rangers are not paired. That level of provision was considered relatively low in the review by Liley *et al.* (2023).
- 3.21 In South East Devon the wardens need to cover around 27km of shoreline along the Exe Estuary plus an area of around 1,200ha (the combined area of the East Devon Heaths and Dawlish Warren). A team size of just 2 wardens, if out patrolling around 25 hours a week, might achieve around 1,300 hours¹⁸ on patrol per year. With levels of development around 1,941 per annum, that level of coverage is around 40 minutes per new development per year and would seem low. Wardens on the Solent can engage with around 6 groups of people per hour (Liley *et al.*, 2023), assuming similar timings for the South East Devon sites would suggest 2 wardens might achieve the equivalent of 4 interactions with visitors for each new dwelling built. These calculations are relatively simplistic but highlight the current provision is too low and is likely to need to at least double to achieve a better level of coverage.

Monitoring

- 3.22 Monitoring data reflect the level of mitigation achieved, website hits, social media engagement etc. and have also included visitor surveys (Caals, Panter and Liley, 2022) and monitoring of wildlife refuges on the Exe Estuary (Saunders. and Liley, 2021).

¹⁸ i.e. 25 multiplied by 52, made on the assumption the rangers operate as a pair rather than separately

- 3.23 Looking to the future, there is scope to review the monitoring that is integrated within the mitigation strategy and potential for additional monitoring to help target warden time, the patrol boat time and other measures, in order to help hone and inform mitigation delivery. The original strategy included visitor questionnaire work at five-year intervals and regular counts of visitor numbers, however the budget was not sufficient to allow these to be fully implemented as planned.

Stakeholders and engagement

- 3.24 A key element in the mitigation delivery has been stakeholder engagement and the need to involve and work closely with a wide range of people and organisations. These include both internal stakeholders (within the relevant local authorities) and external parties. For the mitigation package to work smoothly and be successful it has to involve local landowners, the public, visitors to the sites, community groups, user groups, developers, nature conservation bodies, statutory agencies, relevant forums and partnerships, local authority staff (including those involved in green infrastructure, communications, strategic planners, development management, legal and tourism) and elected Council members. The Wildlife Wardens and Delivery Manager clearly have an important role to play in bringing stakeholders together and keeping them informed, however there is potential to communicate to the various groups further, extending reach and ensuring the mitigation package works in its totality.
- 3.25 The Exe Estuary Management Partnership ran the consultation on the wildlife refuges, as well as the code of conduct consultation. Having a third party able to bring together users, local businesses etc. was potentially very important in this instance. Looking to the future, bringing together different groups and establishing opportunities to communicate widely to stakeholders will be important.
- 3.26 Exeter City Council is seeking a Harbour Revision Order (HRO) which is likely to be in place in the 5 year period covered by this strategy. The HRO will provide new powers including the potential to update byelaws and apply Special Directions for specific instances or occasions. This will involve consultation with users and the potential for new updated legislation and guidance for users.
- 3.27 Looking ahead, the Devon Local Nature Recovery Strategy (LNRS) will provide supporting evidence for local plans and cover the whole of the county. The

LNRS will set priorities for future focus in terms of geographic areas, species and habitats and will involve planners, developers and others. There may well be opportunities within the LNRS to link to the measures in this mitigation strategy.

Devon Loves Dogs

- 3.28 Devon Loves Dogs has been successful and has been gathering momentum and recognition. It is however constrained by resources in terms of staff time, vehicle etc. The original strategy included an annual cost to run the Project of £2,000 and there is clearly scope for this to be increased and for more events and greater levels of engagement to be achieved. The county-wide branding brings recognition and scope for growth (e.g. funding to include cover at other sites), but this risks the core sites for mitigation delivery being missed.

Parking on the Pebblebed Heaths and visitor infrastructure

- 3.29 Given that the majority of visitors come by car, the car parking capacity on the East Devon Heaths provides a means ultimately to limit visitor numbers. Verge parking is minimal now and there have been reductions in the number of car-parks, from 22 car parks around 2000, to about 17 now. There is a difficult balancing act to ensure in the long-term sufficient, adequate parking for a sustainable amount of visitor use, with those car-parks in the right places so that visitor footfall is not focussed in the most sensitive places and is distributed appropriately across the site.
- 3.30 Clinton Devon Estates have been formalising some car parks, improving efficient use of space/routing of traffic, so that they know better what their total capacity is, and can monitor how close to full they actually come. New signs, height restriction barriers and changes to layout and design have also been incorporated. The redesign helps with mitigation as it provides a physical limit to the amount of parking at particular locations, facilitates engagement (by ensuring signs, bins, path routing etc is all integrated into the design) and makes it clear to visitors the site is well managed and looked after, reducing the risk of antisocial behaviour.
- 3.31 One factor potentially influencing visitor use of the heaths is the lack of parking charges, meaning it is one of the few countryside areas in the region where it is possible to park for free. There is scope to review how this might influence visitor use and to consider the implications and relative merits of changing this over time. Charging for parking may help visitors appreciate

the challenges in looking after the Heaths and may influence visitor perceptions of the site, as well as possibly changing how often and when people visit. It should however be noted that charging may not necessarily reduce visitor numbers (Weitowitz *et al.*, 2019), but it may also generate revenue to help with the long term funding of management on the Heaths.

Suitable Alternative Natural Greenspace (SANGs)

- 3.32 SANGs provide additional greenspace for recreation, providing space for recreational use away from European sites. As such they work as mitigation when they provide an alternative that draws users who would otherwise visit the European site. There are various approaches to how SANGs can be delivered, for example new (or enhanced) green space can be created and managed strategically by a local authority, or new open space can be provided by developers alongside new housing. A list of existing, emerging and potential SANGs is provided in Appendix 1.
- 3.33 The main SANG site so far established is Dawlish Countryside Park, which has been purchased by Teignbridge District Council. The site has been flagged in the dog walking code of conduct for the Exe Estuary, and as such it is being actively promoted to dog walkers using the estuary. Visitor data (Caals, Panter and Liley, 2022) shows the SANG to be working well. For example, 44% of interviewees on the Exe Estuary had visited Dawlish Countryside Park. Furthermore, when asked which single alternative location visitors at the SANG would have gone to instead, Dawlish Warren was the most popular alternative (cited by 13 interviewees, 19% of interviewees at the SANG). Postcode data show the SANG draws visitors from the local area, including Dawlish and from as far afield as Exeter and Newton Abbot.
- 3.34 Other SANGs include Ridgetop Park near Matford. The total SANG area that has been secured will be almost 40ha and is being delivered by the local authority (partnership). Phase 1 was formally opened in 2023 and is around 21ha.
- 3.35 There has been limited SANG delivery to date on the east side of the Exe Estuary. This may in part be due to it proving difficult to find suitable locations, and means that there is a disparity in SANGs provision and the SANGs element of the existing strategy has not worked smoothly. The gap in SANGs east of a line between Exmouth and Exeter is a priority for the future.
- 3.36 In other areas such as the Thames Basin Heaths a formulaic approach to SANGs is clearly set out and rigidly adhered to. The formulas set out the level

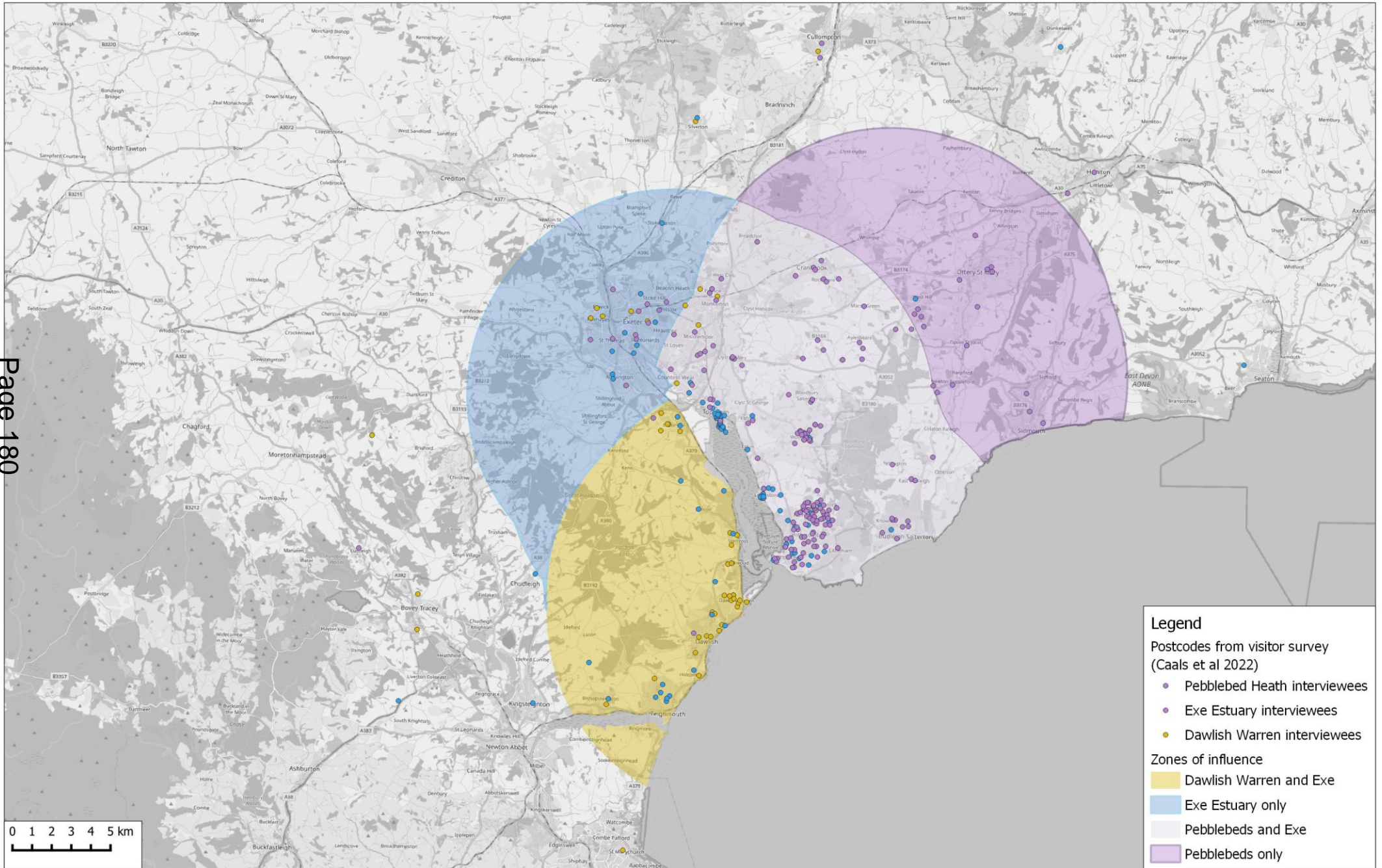
of SANG provision per dwelling (8ha per 1,000 new residents) alongside detailed prescriptions of how SANGs should work, including guidelines for site size, parking provision, distance from development, design etc. In the original South East Devon strategy such an approach was avoided as it was recognised that there were different issues around the coast, where SANGs potentially play less of a role in an overall mitigation package due to the unique draw of the coast. Evidence is growing on the effectiveness of SANGs in a coastal location (e.g. Caals, Panter and Liley, 2022) and looking to the future there is a need to provide greater clarity about the level of SANG provision required from different developments and clear guidance on what SANG should look like and how it should work.

- 3.37 It is also now becoming increasingly recognised that there is a role for SANGs to be multi-functional in that they can provide for some other benefits alongside a primary purpose of mitigation for recreation impacts. Defra's Environmental Improvement Plan (2023) recognises the importance of spending time in nature and sets a commitment that everyone should live within a 15 minute walk of a green or blue space. Access to the countryside is now recognised as bringing wide benefits to society that include benefits to mental/physical health (Pretty *et al.*, 2005; White *et al.*, 2019; Kondo *et al.*, 2020; Mental Health Foundation, 2021; Nghiem *et al.*, 2021) and economic benefits (ICRT, 2011; ICF GHK, 2013; Keniger *et al.*, 2013; The Land Trust, 2018). There is also scope for SANGs to provide benefits around ecosystem services (water quality, flood protection, carbon sequestration) or biodiversity net gain that are not incompatible with a primary aim of recreation provision. As such there are perhaps opportunities for wider funding and better promotion of the potential benefits of SANGs.

4. Zones of influence

- 4.1 The original strategy is based on zones of influence around each of the European sites. The zones reflect the area where new development is likely to result in increased access to the European sites and therefore trigger likely significant effects and a need to secure mitigation.
- 4.2 The zones were drawn at 10km, based on visitor survey data (Liley, Fearnley and Cruickshanks, 2010; Cruickshanks and Liley, 2012), primarily the results from a postal survey. The rationale behind the zones (and detailed consideration of alternatives) are described in the original strategy. In simple terms, 10km captured the majority of visitors, around 70-80% for the East Devon Heaths and the Exe Estuary and lower for Dawlish Warren. The zones resulted in a relatively complex, Venn-diagram like approach, with some areas falling within one zone of influence and other areas falling within two zones.
- 4.3 Since the previous mitigation strategy further visitor data have become available (Caals, Panter and Liley, 2022). The visitor postcodes from that survey are shown in Map 2, which shows the zones work well to reflect the more recent postcode data (which were collected at a relevant times of year for each European site). In total, 76% of those interviewed at the Exe survey points (including Dawlish Warren) had home postcodes within 10km of the SPA/Ramsar boundary. For those interviewees at Dawlish Warren 60% lived within 10km and for the East Devon Heaths 86% lived within 10km. Caals et al suggest no reason to change the zones of influence.

Map 2: Zones of influences and recent postcode data



5. Scale of future development

5.1 The scale of growth in the relevant local plans is summarised in Table 2 (period 2025-2040) and Table 3 (2025-2030). The totals are approximate and reflect the overall scale of growth that needs to be mitigated. These show nearly 30,000 new dwellings are likely to come forward 2025-2040 within one of the relevant zones, this equates to around 1,941 dwellings per annum. Within the first 5 years (2025-2030), the level of anticipated growth is slightly higher, at just over 2,000 dwellings per annum.

Table 2: Approximate scale of growth in relevant plans within relevant zones of influence, 2025-2040.
Data provided by relevant local authorities to provide an estimate of level of growth requiring mitigation

Local authority	Anticipated housing 2025-2040 and within 1+ zones	Estimate within Exe Estuary 10km zone	Estimate within East Devon Heaths 10km zone	Estimate within Dawlish 10km zone
East Devon	14,400	12,486	14,392	0
Exeter	8,607	8,607	2,325	0
Teignbridge	6,104	6,104	0	2,395
Total	29,111	27,197	16,717	2,395
Yearly average	1,941	1,813	1,114	160

Table 3: Approximate scale of growth in relevant plans within relevant zones of influence, 2025-2030.
Data provided by relevant local authorities to provide an estimate of level of growth requiring mitigation

Local authority	Anticipated housing 2025-2030 and within 1+ zones	Estimate within Exe Estuary 10km zone	Estimate within East Devon Heaths 10km zone	Estimate within Dawlish 10km zone
East Devon	4,374	3,821	4,370	0
Exeter	3,618	3,618	1,475	0
Teignbridge	2,033	2,033	0	1,281
Total	10,025	9,472	5,845	1,281
Yearly average	2,005	1,894	1,169	256

- 5.2 Table 4 summarises the potential level of growth (2025-2040) in relation to the number of dwellings (as of 2023) in each zone and the zones combined. It can be seen that the proposed level of growth represents a change of nearly 30% for the Exe Estuary and around 25% for the East Devon Heaths. This clearly represents a marked uplift in local housing around those sites. The proposed growth is more focussed on the east of the Estuary as opposed to the west.
- 5.3 Very large uplifts in housing at specific locations in East Devon (Cranbrook and the new town proposed west of Farringdon) to the east of Exeter will have particular implications for the East Devon Heaths. Housing growth is proposed in relatively close proximity and with good, direct road links marked uplifts in recreation use are likely. Rapid changes are likely at what are currently quite rural feeling heaths.

Table 4: Potential change in housing numbers. Dwellings in 2023 extracted from national postcode database and reflect the number of residential delivery points.

Local authority	Total in 2023	Anticipated 2025-2040	% change
All three zones combined	129,712	29,111	22.4
Estimate within Exe Estuary 10km zone	92,114	27,197	29.5
Estimate within East Devon Heaths 10km zone	66,722	16,717	25.1
Estimate within Dawlish 10km zone	21,734	2,395	11.0

6. Mitigation measures

6.1 Mitigation measures are split into:

- SAMMS (Strategic Access Management and Monitoring); and
- Off-site infrastructure (including SANGs – ‘Suitable Alternative Natural Greenspace’ and local projects).

6.2 Figure 1 provides an overview of the key elements of the strategy.

SAMM				
THEME	Engagement	Access Infrastructure & Projects	Monitoring	Off-site Infrastructure
AIMS	<ul style="list-style-type: none"> Increased awareness of issues Influence behaviour change (e.g. dogs on leads) Deflect access (e.g. to SANGs) 	<ul style="list-style-type: none"> Influencing distribution of access within European sites Containing access Increasing resilience of European sites 	<ul style="list-style-type: none"> Information to inform mitigation Early warning of change and emerging issues Increased cost effectiveness by ensuring focus 	<ul style="list-style-type: none"> Provide alternative visitor destinations Reduce visitor numbers of European sites
ACTIONS	<ul style="list-style-type: none"> Wardens Devon Loves Dogs Communications Officer South East Devon Wildlife (SEDW) Website Codes of Conduct Exe Leaflets Schools Patrol boat Stakeholder engagement New interpretation Web Camera Interpretation Education work around fire Visitor facility at Dawlish Warren 	<ul style="list-style-type: none"> Review of signage and new/improved signage Managing access at sensitive locations Ongoing maintenance of buoys at refuge Additional dog bins Review of parking charging Special projects pot Signage Fire strategy work and review Advice/specialist input re management interventions around dog walking Resources for work with commercial dog walkers Maintenance of high tide roost at Dawlish Warren Flexible projects pot 	<ul style="list-style-type: none"> Production of monitoring strategy & monitoring support Visitor survey Refuge monitoring Vantage point counts Monitoring: ecology (birds, Southern Damselfly) Monitoring: people behaviour Monitoring: vehicle counter data collection Petalwort monitoring and survey 	<ul style="list-style-type: none"> SANGs and Infrastructure Projects Coordination Officer Large alternative visitor sites ('SANGs') delivered by developers at large development sites Strategic SANGs (new and enhanced existing sites) delivered by LPAs Rolling list of local projects, enhancing green infrastructure and access opportunities away from European sites

Figure 1: Summary of mitigation measures. Actions in blue text relate to those that are Exe Estuary specific, those in purple are East Devon Heaths specific and gold reflects those specific to Dawlish Warren. Actions in black apply across all 3 sites.

Strategic Access Management and Monitoring (SAMMS)

- 6.3 SAMMs measures fall within three broad themes, namely:
- Engagement;
 - Access Infrastructure and Projects; and
 - Monitoring.
- 6.4 The measures are set out in Table 5.
- 6.5 The warden team is fundamental to the mitigation delivery. The warden team's core work will involve providing a presence on-site through their patrols of the relevant European sites. This provides the confidence that mitigation is targeted towards direct engagement with those visiting the European sites and the ability to directly influence those spending time on those sites. The funds provide the wardens with the necessary resources (such as vehicles and the patrol boat) to deliver this mitigation. Warden time should be ring-fenced and focussed on maximising their time out on the heaths, the estuary and at Dawlish Warren.
- 6.6 Warden time should be closely monitored and levels of engagement with visitors and interactions carefully logged. This will enable future updates of the strategy to ensure warden provision is adequate, with the team being increased (or decreased) over time as necessary.
- 6.7 Alongside the wardens, other mitigation measures include the refuges, signage, interpretation and funding that can be used for discrete 'special' projects and allows relevant delivery bodies to be able to draw down on funds.
- 6.8 The SAMM measures are able to shift and adapt with time, which is essential given likely changes at the sites, for example with respect to climate change. Warden time can be focussed as most relevant and project funds can be directed to where they are needed. Engagement for example through social media provides further opportunity to reinforce messaging and influence behaviour in a targeted and dynamic way.
- 6.9 The marked uplifts in housing growth proposed in the area to the east of Exeter mean the east side of the Estuary and the East Devon Heaths are likely to see particular changes in access. Alongside the flexible warden provision and other engagement (which can be ramped up/targeted as appropriate), it will be necessary for infrastructure changes to address issues as they arise. Parking around the East Devon Heaths is a particular case in

point. Managing parking will provide a means to influence visitor use in terms of both numbers of people and where they go. Reviewing parking charging and instigating measures to address roadside parking (such as establishing clearways on relevant roads) may be necessary. Developer contributions will be available to fund the costs as and when they are necessary.

Table 5: SAMMs measures. Shading reflects those specific to the Exe Estuary (pale blue), East Devon Heaths (purple) and Dawlish Warren (yellow).

Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
All	Delivery Manager	Full time post managing warden team and providing overall steer for mitigation delivery and link to partners, stakeholders, planners etc. Role also proving strategic links and wider policy work/liaison	SEDHRP	Manager post key to ensuring smooth delivery and oversight of implementation	
All	Wardens, team to scale up to 5	Warden team expanded from 2 to 5 FTE and including team leader post. Key function is patrolling on the European sites and directly engaging with visitors to those sites	SEDHRP	Wardens are a cornerstone of the mitigation. Additional wardens needed to provide year round cover and work effectively. Requirement to be paired, plus scale of area and pivotal importance of the warden team means team size needs to increase. Team of 5 allows for 2 on the heath and 2 on the estuary.	Currently more emphasis in summer as bird breeding season. More presence in winter necessary and clear immediate priority to boost team size. Scope to have on bikes in future?
All	Vehicles for warden team	Running costs to cover vehicle and other running costs for events etc	SEDHRP	Budget required for transport and operational work	
All	Devon Loves Dogs staffing costs	Team to expand to 2 fte	SEDHRP	Additional staffing required to build project and focus on key user group. Dog walkers main user group to influence and one with biggest impact	
All	Resources for Devon Loves Dogs	Running costs to cover vehicle and other running costs for events etc	SEDHRP	Budget required for transport and operational work	
All	Communications Officer staffing costs	Mitigation relies on effective behaviour change through communication of key messages - focused, specialist work on social media, press, newsletters.	SEDHRP	Budget required for operational work, targeted comms planning, campaigns, social media, newsletter and	

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Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
				promotional/networking opportunities.	
All	DLD Website	Website for Devon Loves Dogs	SEDHRP	Necessary to cover regular updates, refresh and content	
All	South East Devon Wildlife (SEDW) Website	Website for work of wardens	SEDHRP	Necessary to cover regular updates, refresh and content	
All	DLD Brand refresh	Pulse of work to update branding, covering graphic design and overall refresh	SEDHRP	Ensures public face of mitigation works and conveys right messages	Every 10 years
All	SEDW Brand refresh	Pulse of work to update branding, covering graphic design and overall refresh	SEDHRP	Ensures public face of mitigation works and conveys right messages	Every 10 years
All	Wardens projects	Operational budget for warden team	SEDHRP	Necessary to ensure warden team can utilise new ways of engaging and purchase required resources. Allows scope for seasonal campaigns and fresh material.	
All	Production of monitoring strategy & monitoring support	Consultancy support to work with SEDHRP and stakeholders to design monitoring programme and recording to cover data collection by warden team, other relevant data (e.g. volunteer bird surveys), reporting protocols and report production	SEDHRP	Will ensure monitoring is conducted efficiently and data available to feed into mitigation delivery	
All	Visitor survey	Visitor survey to cover all European sites and surrounding GI (SANGs etc) at 5 year intervals	SEDHRP	Provides data on changing use patterns, demographics, visitor numbers and visitor origins.	

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Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
All	SANGs and Infrastructure Projects Coordination Officer	Post to oversee SANG provision, delivery, design and maintain oversight	SEDHRP, EDDC, ECC, TDC	Necessary to ensure coherent and joined up approach to SANG and alternative green infrastructure provision, with role liaising with developers, planners, Natural England and other stakeholders	
All	Admin and accountancy support	Budget to cover annual accounting and monitoring of housing totals	SEDHRP, EDDC, ECC, TDC	Necessary to ensure in-perpetuity costs set aside appropriately and administration of finances	
Exe	Codes of Conduct	Codes updated, with potential for additional codes (drones/personal aircraft), also printing and distribution costs	SEDHRP, EEMP	Codes fulfil an important role in terms of information on how visitors are expected to behave and guidance. It is essential they are up to date, relevant and fit for purpose	Paper leaflets may be less likely to be used over time and essential information also available interactively on the web
Exe	Exe Leaflets	Budget for refresh and reprints of 4 existing leaflets: Exe Explorer, Exe Wildlife, Exe Activities and Exe Heritage.	SEDHRP, EEMP	Leaflets well used resource providing information on where to go, public transport, access etc alongside key messages such as location of refuges. Essential that they are up to date, accurate and relevant	Paper leaflets potentially less likely to be used over time and essential information also available interactively on the web. Update scheduled in 2023/24 so further update potentially necessary for around 2030
Exe	Schools	Review of education provision and material, and budget for creation of new material to support education work around estuary	EDDC, TDC, EEMP	Working with schools and young people a good way to reach local community	Work was undertaken prior to Covid and packs were produced at the time. There is a range of packs etc already on the web. EEMP and a range of other

Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
					bodies run existing education work. Scope for mitigation partnership to support through provision of material
Exe	Managing access at sensitive locations	Budget to cover series of small projects relating to access infrastructure around the estuary. Some initial work required to produce costed, prioritised plan (Delivery Manager). Locations/measures potentially relevant could include: Imperial Recreation Ground (measures relating to managing access onto the intertidal, creation of barrier/hedge or similar on the revetment to keep access back from shore), Eaels Dock (project relating to boat use and reducing disturbance risks), Cockwood steps (signage), Dawlish Warren (temporary fencing), range of locations (new/improved bird hides, screens or similar). Also potential to include measures to reduce disturbance on functionally-linked land outside Estuary.	various	Distribution of birds and ways people access shoreline change over time. Projects involve targeted interventions at specific locations to help influence behaviour and where people go. Options at Dawlish will allow quick response to changes in habitat there which may influence access and recreation impacts.	Some projects may require budget for annual maintenance, for example a low hedge at the Imperial Recreation Ground would need cutting. Projects on functionally-linked land should only be funded if they work to reduce disturbance on SPA birds, for example rerouting footpaths so as to avoid disturbance risks to existing roost site.
Exe	Patrol boat	Review of current patrol boat use and costs to implement changes following review. Potential to switch to different boat type to facilitate use.	SEDHRP	Boat can target watersports and those out on the water and provides a visible presence reducing particularly damaging/disturbing activities	Current boat has high sides and a cabin. Parking is difficult in the marina and the boat isn't ideal in strong winds. Review necessary to consider costs and explore options with budget to allow swap to a different craft.
Exe	Ongoing repair/maintenance of buoys at refuge	Upkeep of refuge buoys and new interpretation on the buoys		Refuges provide core areas with wildlife focus. Buoys mark these areas but need upkeep and	

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Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
				repair. Interpretation/signage on buoys will make it clear what their role is	
Exe	Stakeholder engagement	Costs cover engagement with organisations, groups, clubs and businesses around the Estuary to ensure awareness and understanding of mitigation	SEDHRP, EEMP	Wide range of bodies, organisations etc with an interest in the Estuary. Regular dialogue ensures smooth delivery of mitigation.	
Exe	Review of signage and new/improved signage	Estuary wide review of signs followed by implementation of new signage as required	Multiple, including landowners	Signage needs to evolve and change over time. Signs help with wayfinding and inform behaviour (e.g. dogs on leads, launching points, shoreline access etc) and to direct people (e.g. to SANGs). Potential for new/improved signage at range of locations including groyne 9 at Dawlish Warren, Dawlish Warren car park and potentially other points around estuary.	A number of signs have been added to the Exe Estuary site by a variety of organisations since the last signage review in 2018 by the EEMP
Exe	New interpretation	Interpretation panels to provide information on wildlife interest, sensitivity and access information	Multiple including landowners	Scope for new panels outside the Centre on Dawlish Warren and in the buffer zone at Dawlish Warren and other locations around the estuary.	
Exe	Refuge monitoring	Core counts undertaken at 5 yearly intervals, as per previous monitoring		Checks of incursions into refuges, impacts of activities around periphery and check on bird use. Feeds into long term	Programming of this work potentially informed by monitoring strategy

Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
				provision, management and design of refuges.	
Exe	Vantage point counts	Vantage point counts (as used in refuge monitoring) extended to cover whole estuary, with counts undertaken by Wardens. Aim to provide monitoring protocol to pick up changes in activity and behaviour		Continuation of existing monitoring, undertaken by wardens and providing key baseline as to use of refuges and surrounding area	Design and scale to be informed by monitoring review, counts undertaken by wardens
Exe	Web Camera	Provision of web camera for 5 year period to highlight and showcase wildlife	Various	Cameras provide opportunity for people to experience the wildlife without undue disturbance. Camera could show wader roost and footage would help people understand frequency of disturbance and potential risks	Railway saltmarsh and the main roost at Dawlish Warren potential locations
East Devon Heaths	Additional dog bins	4 additional dog bins with costs to empty	CDE, RSPB, DWT	Bins are currently often full and overflowing. Need for additional capacity	Needs further consideration of the relevant locations
East Devon Heaths	Review of parking charging	Dedicated review to come up with recommendations relating to whether to charge for parking and any other parking considerations. Review would need to consider the impact of charging at other sites (coast, estuary, woods nearby) while the parking at the Pebblebeds remains free. Review would need to extend to consideration of infrastructure, charging approaches, messaging and provision of dedicated facilities such as charging for electric vehicles.	CDE, RSPB, DWT	Concern that current free parking provision results in site drawing recreation use from less sensitive locations that charge	
East Devon Heaths	Special projects pot	Mechanism available to fund mitigation measures in the future such as clearways (legal fees), projects relating to fire (e.g. hydrants), provision of	CDE, RSPB, DWT	Recognition that access patterns are changing and different opportunities may emerge, along	These projects dependent on other factors or monitoring results

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Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
		alternative parking and further improvements or changes to parking		with some uncertainty around the outcomes from the parking charges review. Pot would allow part or complete funding for measures that have mitigation benefit and ensure mitigation targeted to maximise benefit.	
East Devon Heaths	Signage	Rolling budget to cover additional signs and waymarkers where required	CDE, RSPB, DWT	Low key markers and waymarkers to help people follow routes	
East Devon Heaths	Interpretation	New or updated interpretation at 5 locations	CDE, RSPB, DWT	Interpretation to convey key messages and raise awareness of conservation importance	
East Devon Heaths	Fire strategy work and review	Piece of work to review risks, emerging issues and recommendations for mitigation measures as necessary - e.g. around reducing fire load, better fire access, education/awareness raising etc	CDE, RSPB, DWT	Fire an increasing threat with climate change. Funds would cover specialist consultancy support to review current management and procedures	
East Devon Heaths	Education work around fire	Targeted awareness raising work, potentially extending to local schools and community groups to raise awareness of risks of fire and causes	SEDHRP, CDE	Fire an increasing threat with climate change. Important to ensure local community aware of risks	May be potential to learn from Firewise project undertaken around the Dorset Heaths
East Devon Heaths	Advice/specialist input re management interventions around dog walking	To date measures have been very much focussed around dog fouling and the need to pick up. Scope to expand measures to encompass dogs keeping to paths and responsible dog walking. Advice will be used to inform warden resources, campaign material and interventions through the special projects pot	CDE, RSPB, DWT	Dogs ranging widely off lead a potential issue in relation to livestock, Nightjar and Dartford Warbler. Specialist support needed to ensure messaging and communication approaches are right and proportionate.	

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Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
East Devon Heaths	Resources for work with commercial dog walkers	Current system in place for permits etc. This needs to expand to provide clear guidance on behaviour requirements and as necessary scope to revoke permits	CDE, RSPB, DWT	Clear gap in current visitor management	
East Devon Heaths	Monitoring: ecology (birds, Southern Damsel fly)	Already undertaken but budget to ensure additional coverage/support for volunteers etc	CDE, RSPB, DWT	Ensures any gaps are filled and good coverage achieved	
East Devon Heaths	Monitoring: people behaviour	Observation survey	SEDHRP	Dedicated piece of work to assess current levels of compliance and prevalence of particular behaviours (such as not picking up, dogs off leads, bikes away from cycle routes etc); potential to check compliance with different signs and following particular campaigns	
East Devon Heaths	Monitoring: vehicle counter data collection	Vehicle counters in sample of main car parks to provide robust standardised data over time on levels of use	SEDHRP	Provides metric for how levels of use are changing, and means to check implications of different interventions	
Dawlish Warren	Visitor facility at Dawlish Warren	Some kind of focus for visitor engagement	TDC	There is a need for new facilities at Dawlish Warren to provide focal point for visitors, wardens and site-based staff for engagement.	Some uncertainty around design, function, location etc to be addressed over time
Dawlish Warren	Flexible projects pot	Budget to cover series of small projects relating to access management at the site, in particular scope to purchase and erect temporary fencing.	TDC	The dynamic front edge to the dune system creates a challenge in managing access. Infrastructure needs to change	

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Site	Mitigation measure	Description	Parties involved in delivery	Justification	Notes
				with time and needs can be unpredictable. Following storms and marked change, sudden response is often necessary, often requiring new fencing, temporary signage etc.	
Dawlish Warren	Petalwort monitoring and survey	Some funds for ongoing monitoring as needed	TDC	Regular and more systematic funding covered by Natural England but costs here to cover additional surveys and specialist support as needed and informed by monitoring strategy	Greenland lake the only population remaining. Translocation may take place in future.
Dawlish Warren	Maintenance of high tide roost at Dawlish Warren	Measures to improve, enhance and protect roost at Dawlish Warren with potential to add shingle, remove vegetation or better protect	TDC	The Dawlish Warren roost is one of the key roost sites on the estuary. Given changes at Dawlish Warren roost is vulnerable and over time there may be further opportunities to maintain in the short-term and ensure disturbance free roost site available.	

Off-site infrastructure

- 6.10 Off-site infrastructure will provide access or enhance existing land away from the European sites, with the aim of drawing some visitors and recreation use to alternative destinations. Three different approaches (see Figure 2) are possible and relevant to different types of development.

Developer led SANG (greenfield)	Strategic SANG	Rolling list of LPA projects
<ul style="list-style-type: none"> • Individual developments (not part of wider allocation) in the region of 300 or more dwellings and allocations in the region of 300 or more dwellings are expected to provide their own SANG as well as maintenance costs. • Developers providing part of a wider allocation will need to ensure suitable Master planning for a well-interconnected overall SANGS provision. • SANGs assessed as part of HRA and agreed with Natural England • Councils (or their nominee) should be given first refusal on delivery (developer-led delivery may be acceptable). • Guidelines set out in Appendix 2 and planning application principles in Appendix 3 	<ul style="list-style-type: none"> • SANG delivered by LPAs to provide mitigation for multiple developments over a wide area, including in most cases developments of fewer than 300 dwellings. • New sites and/or enhancements to existing sites. • Funded through developer contributions. • Guidelines set out in Appendix 2. 	<ul style="list-style-type: none"> • Rolling list of local projects enhancing green infrastructure and access opportunities away from European sites. • Tailored to local needs and specific circumstance. • Guidelines in Appendix 4.

Figure 2: Different off-site infrastructure

- 6.11 Developer-led SANGs will be delivered directly by developers through on-site provision. Other types of infrastructure will be led by the local planning authority and funded from contributions. Guidelines for SANG design and implementation are provided in Appendices 2-4. These may be updated over time and/or supplementary guidance produced by the relevant local planning authority.
- 6.12 For large sites in the region of 300 or more dwellings, provision of SANGs should form part of the overall infrastructure provision of that site, particularly where urban extensions or new settlements are proposed. This approach would also be anticipated where adjacent sites or clusters of sites come forward separately. These developer led SANG will be incorporated

into the site design and master planning from the outset. SANGs provision should be delivered in advance of occupation of dwellings, however for larger proposals mitigation may be structured so as to tie in with development phasing.

- 6.13 The costs for establishment of these developer-led SANGs will be met by the developer and a means to secure the long-term maintenance and management will also need to be secured. This provision will need to be agreed with the relevant Planning Authority and Natural England, and checked as part of the HRA. The Councils (or their nominee) should be given first refusal on delivery to ensure long term security.
- 6.14 Small sites and brownfield sites within the built-up area are unlikely to be able to accommodate the scale of space required for a SANG and would therefore make a contribution towards strategic SANG or a contribution towards a range of discrete projects enhancing existing access.
- 6.15 Strategic SANG will provide large destination sites and are likely to be the most effective in drawing alternative recreation use. Dawlish Countryside Park provides an effective model to replicate. Such LPA led sites are likely to be better quality greenspaces and provide a different visitor experience to most developer-led greenspace which will be typically local to large developments. Such sites can have a council ranger presence ensuring community engagement.
- 6.16 A rolling list of projects will be produced by each authority, tailored to fit with the local needs for access and demand in the local area, and will fill any remaining mitigation need (alongside Developer-led SANG and Strategic SANG). How local greenspaces are managed will have implications for the European sites, for example dog bans on beaches could deflect use to the heaths, or footpaths that are poorly maintained are unlikely to be used. The rolling list of projects could include measures such as new footpath links, improved parking, fenced dog exercise/training areas, communication to visitors, improved path infrastructure, better access (road crossings or bridges) etc.
- 6.17 Such projects would be appropriate in the urban areas of Exeter where the recreational behaviour of urban residents may differ to those outside the city and there are limited opportunities to create large new greenspace. Such projects will also be more appropriate in more rural areas where small levels of growth and windfall come forward in locations where there is no strategic SANG.

- 6.18 Each authority will ensure a list of projects is agreed with Natural England and updated as needed. The list may well overlap with green infrastructure strategies but will be separate and clearly identified as mitigation. Costs and relevant levels of contribution will be determined by each authority. Potential projects within Exeter are listed in Appendix 5 (provided by the Council).
- 6.19 These different options provide a tiered approach to off-site infrastructure and over time will ensure robust mitigation by increasing the quality and availability of accessible natural greenspace outside European sites. The different options will mean a range of infrastructure is available to local residents including destination sites with car parks and a range of facilities, to more local and small-scale provision. The aim should be to deliver a network of inspiring greenspace that delivers the necessary mitigation and, as appropriate, fulfils a range of other functions such as climate change resilience, reduced need for car travel, nature recovery and health benefits.

7. Implementation

- 7.1 There is an already established approach to governance and implementation. The South and East Devon Habitat Regulations Executive Committee provides oversight and governance, and there is an officer working group that brings relevant organisations together and provides advice and recommendations. The Delivery Manager provides the key point of contact between the different groups and oversees the delivery of much of the mitigation on the ground.
- 7.2 It will be important, looking forward, that there is flexibility and regular review as to how money is spent and what is needed on the ground. A number of factors (such as Covid, extreme weather conditions, the cost of living crisis) have had an impact on visitor behaviour, visitor numbers, access infrastructure and/or the European sites themselves in recent years. Changes in housing delivery will affect how much mitigation revenue is collected. There is uncertainty as to how priorities might need to change in the future, and such uncertainty can only be addressed through good monitoring, adaptive mitigation and regular review.
- 7.3 Certain elements within the mitigation package have the scope to adapt and flex as conditions and priorities change. Furthermore, it is possible that additional opportunities may arise, for example as a result of changing land ownership. It is important therefore that the governance is flexible and responsive enough to enable developer contributions to be shifted to different components of the strategy easily. Annual reviews of budgets and the ability for the Delivery Manager to adjust finances as appropriate (with rapid approval from the Executive Committee) will be key.
- 7.4 We also highlight the importance of the various delivery partners, for example at Dawlish Warren, and on the East Devon Heaths there are experienced staff with the ability to deliver mitigation on the ground. It would be ideal for such organisations to work with the Delivery Manager and be able to directly bid to the Executive Committee for money for particular projects that have a clear mitigation benefit and fit with the strategy.

Developer contributions and in-perpetuity costs

- 7.5 Mitigation is secured for the duration of the impact and it is assumed the implementation of the mitigation will run for as long as it is required, with money set aside to provide long-term stability and in-perpetuity delivery. The

strategy will operate on a rolling basis into the future, adjusting as necessary to changing levels of house building and impacts arising.

- 7.6 Some measures in this strategy are short-term, one-off measures while others need to run for many years, often extending well outside the Plan period. Changes to access infrastructure, the provision of SANGs (which are secured indefinitely) alongside the increased awareness raising and education work should ensure that the need and annual cost for SAMM can decrease with time. As SANGs become better used and the refuges etc more accepted, the need for the patrol boat, high levels of warden time and other such measures should change. It will be important for regular review and revision of costs as necessary to adjust the amount set aside for long term funding of mitigation measures. As such SAMM is highly unlikely to need to be constant over time. We have derived costs for different measures to cover different lengths of time (see Appendix 6) and these will be reviewed and adjusted on a 5 yearly basis.
- 7.7 Costs for the SAMM component of the strategy are summarised Table 6 and listed by measure in Appendix 6. The overall cost of the SAMM is £25,548,729 with this being split such that £23,907,129 relates to measures that are spread across all three European sites.

Table 6: Summary of SAMM costs per European site

SAMM components	Total cost	Total dwellings in relevant zone	Per dwelling cost
All sites	£23,907,129	29,111	£821.24
Exe specific	£832,600	27,197	£30.61
East Devon Heaths specific	£809,000	16,717	£48.39
Dawlish specific	£300,000	2,395	£125.26
Total	£25,548,729		

- 7.8 The figures in Table 6 enable the SAMM costs per dwelling to be determined for a given zone. All dwellings will contribute to the measures relating to all European sites, whereas only those within 10km of the Exe Estuary will contribute to the Exe Estuary specific components etc. Per dwelling costs based on location are given in Table 7.

Table 7: Summary of costs by location

SAMM components	Total cost per dwelling (SAMM)
East Devon Heaths 10km only	£870
East Devon Heaths and Exe Estuary 10km	£900
Exe Estuary 10km only	£852
Exe Estuary and Dawlish Warren 10km	£977

- 7.9 Per dwelling costs will need to be adjusted to take into account any reserves held by the partnership at the point at which the new strategy supersedes the previous one. The tariff will be further adjusted on an annual basis to take into account inflation, any administrative costs and any other adjustments necessary (e.g. in relation to changing costs or variations in housing delivery).

Types of development

- 7.10 This strategy applies to any future development granted planning permission that results in a net increase in residential units (i.e. C3 Use Class), located within 10km of the East Devon Heaths SAC/SPA, the Exe Estuary SPA/Ramsar and Dawlish Warren SAC.
- 7.11 While the strategy is focussed towards C3 Use Class, there are other uses and forms of development that may have impacts on the European site and could trigger likely significant effects for relevant European sites. Examples of other uses that may need to provide mitigation within the context of this strategy are listed below:
- Houses in Multiple Occupation (sui generis);
 - Residential institutions within the C2 Use Class where the residents are not severely restricted by illness or mobility;
 - Student accommodation;
 - Sites for gypsy, travellers and travelling showpeople;
 - Tourist accommodation, including self-catering, caravan and touring holiday accommodation.
- 7.12 For the above types of development, this strategy provides a means of ensuring effective mitigation can be delivered, but each will need to be assessed on a case-by-case basis. While in general each unit for the above could be considered a single dwelling, there may be a need to adjust the rate of SAMM contribution for different types and off-site infrastructure provision will need to be considered on a case-by-case basis. For example, the SAMM rate could be adapted according to occupancy rates for tourist

accommodation. Project level HRA for tourist applications will need to consider the location and type of use with respect to the relevant European sites, as for example a city centre hotel in Exeter would have a very different impact compared to accommodation focussed around watersports use in Exmouth.

Review and timing

- 7.13 The strategy will operate indefinitely on a rolling basis, with this strategy commencing from spring/summer 2025 and running to 2030. The strategy has, however, been written in the context of local plans and the levels of growth likely to around 2040. The strategy will be reviewed and updated approximately every 5 years, with these reviews checking housing numbers, delivery, costs and mitigation priorities. The reviews will inform the 1 year and 5 year business plan that underpins the work of the partnership and their staff.

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Appendix 1: Existing and potential SANGs

This Appendix summarises SANG sites, highlighting those that are existing and operational as well as those that have been formally proposed, and some key sites that may have potential for SANG, or where further evidence is required are also included.

Site Name	Existing area (ha)	Proposed area (ha)	Notes
Old Park Farm – Site A, (EDDC)	Approx. 6		Integrated with development
Pinbrook Country Park (Minerva) (Tithe barn) – Site B (EDDC)	9 approx		Integrated with development. 7 in Clyst Valley Regional Park
Dawlish Countryside Park SANG (TDC)	26		Well established SANG opened in 2017. Managed by the Land Trust.
Ridgetop Park, Exminster (TDC)	38	30	Now managed by the Land Trust. A further 30ha of SANG is allocated in the TDC Local Plan.
Cranbrook E – Cobdens (EDDC)		28	One quadrant of SANGs for expanded Cranbrook. At planning application stage.
Cranbrook SE – Grange (EDDC)		15	As above. Awaiting application.
Cranbrook W – Bluehayes plus NT Elbury land (EDDC)		18	As above. Planning application due for determination soon.
Cranbrook SW – Treasebeare (EDDC)		17	As above. Planning application.
HF1 Hayes Farm, Clyst Honiton – Site C (EDDC)		14	Possible SANGs in CVRP Masterplan. S106 already requires laying out of paths.
Broadclyst Station new SANGs (EDDC)	9		Recently purchased by EDDC but not yet open to public
Ludwell Valley Park (EC)	26		Existing site with potential for enhancement to provide some SANG capacity
Mincinglake Valley Park (EC)	13		Existing site with potential for enhancement to provide some SANG capacity
Northbrook Valley Park (EC)	5		Existing site with potential for enhancement to provide some SANG capacity
West Exe Country Park (TDC)		50	Potential proposal in Teignbridge Local Plan Review
Attewells Farm, Exeter (TDC)		6	Potential proposal in Teignbridge Local Plan Review. NE have raised concerns about accessibility.

Appendix 2: Suitable Accessible Natural Greenspace (SANGs) guidelines

Developer led SANGs and strategic SANGs will be the main forms of off-site infrastructure. This appendix provides guidance on SANG design. The guidance may be superseded or updated at a later date by relevant partners.

The role of SANGs is to provide an alternative destination to those visitors who would otherwise visit the relevant European sites: Dawlish Warren, the Exe Estuary or the East Devon Heaths. They will be most effective if targeted to those visitors who have a big impact, such as dog walkers.

The effectiveness of SANGs will depend very much on the design and location, these need to work such that the SANGs has a draw equal to or greater than the European sites. In these guidelines we set out design and selection criteria for SANGs, drawing on that produced for other areas such as the Dorset Heaths (Dorset Council and BCP Council, 2020) or the Thames Basin Heaths (anon, 2021). The guidelines do not address or preclude other functions of green space, such as biodiversity net gain. Other functions may be provided within SANGs as long as these do not conflict with the specific function of mitigation.

SANGs may be created from:

- Existing land of suitable size and quality, with no existing or limited public access. Such sites would be 'opened' for public access and promoted as such.
- Land in other uses, such as golf courses, which could be converted into SANGs.

Habitat & character of the relevant European sites

The East Devon Heaths cover some 1,400 ha and make up the largest block of lowland heath in Devon. They are open, relatively undulating and attractive heathlands, with patches of woodland, scattered trees and in places extensive views (Figure 3).

Archaeological interest includes the hill fort at Woodbury Castle and a tumulus. While part of the shoreline of the Exe Estuary is built up, most shoreline areas are attractive countryside, with shoreline paths providing views across the estuary and surrounding landscape of grazing marsh (Exminster Marshes) and rolling countryside comprised of pasture, hedges and woodland. There are extensive sand dunes at Dawlish Warren.

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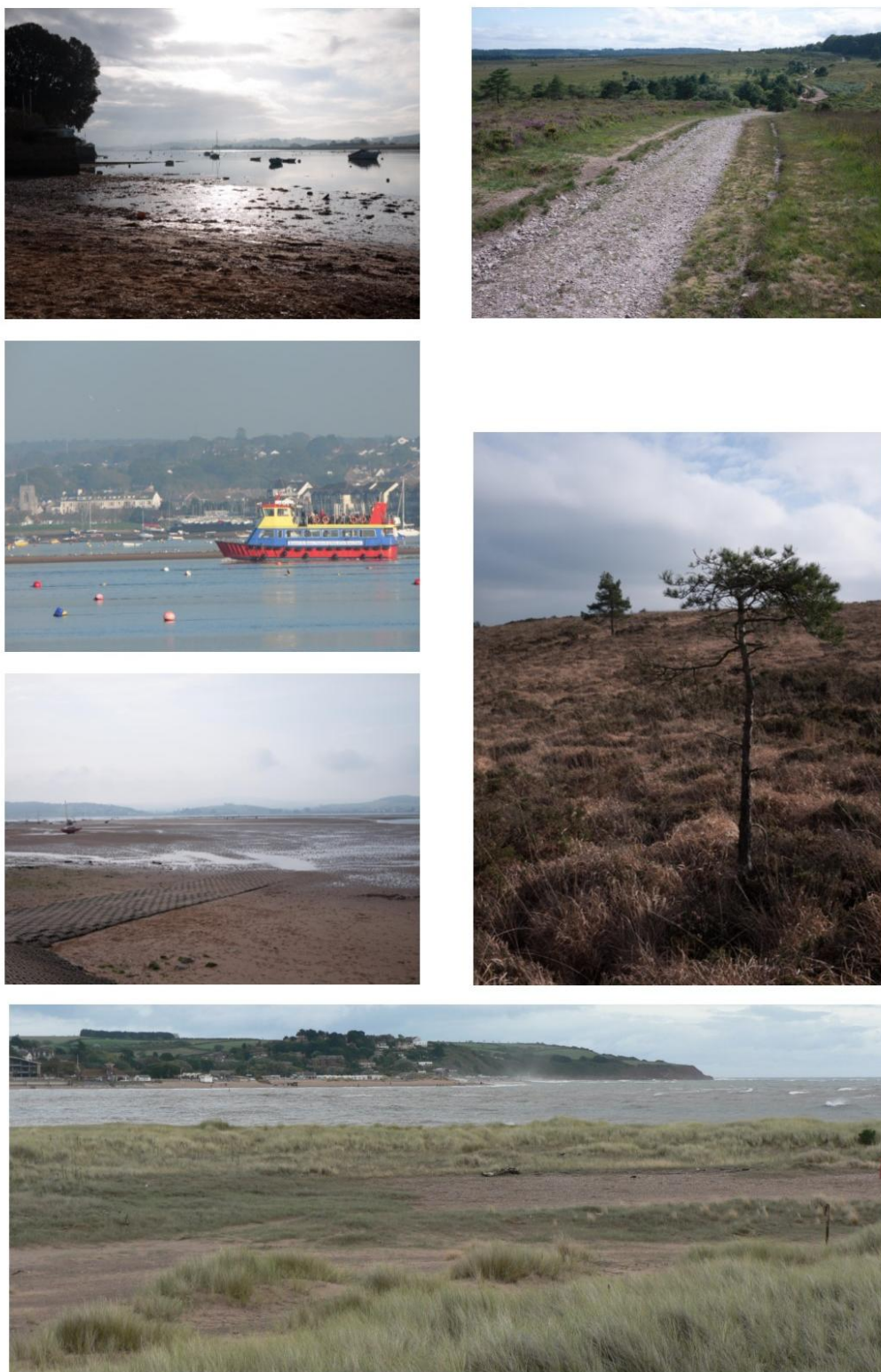


Figure 3: Character of relevant European sites. Top left: 3 images of Exe Estuary; top right: 2 images of the East Devon Heaths; lower image Dawlish Warren.

Access on the relevant European Sites

Visitor surveys on the relevant European sites have involved interviews with a random sample of visitors (Liley, Fearnley and Cruickshanks, 2010; Liley, Panter and Underhill-Day, 2016; Caals, Panter and Liley, 2022) and provide context for SANGs design. Drawing on the results from Caals, Panter and Liley (2022), dog walking is clearly a target group to focus on (the main activity for 69% of visitors at Dawlish Warren, 36% at the Exe Estuary and 63% at the East Devon Heaths). Visits are typically short (less than an hour) and interviewees tended to visit frequently (for example the percentage of interviewees visiting at least daily was 28% at Dawlish Warren, 14% at the Exe Estuary and 16% at the East Devon Heaths). The majority of interviewees (ranging from 46% at the Exe to 97% at the East Devon Heaths) travelled by car and the choice of location was driven by proximity to home as well as the scenery/variety of views and habit/familiarity. Median route length (i.e. length of walk/cycle/jog, all activities combined) was 2.1km at Dawlish Warren, 3.0km at the Exe Estuary and 2.5km at the East Devon Heaths. Home postcode data showed a median distance (postcode to survey point) of 9.2km for Dawlish Warren, 3km for the Exe Estuary and 5.3km for the East Devon Heaths.

Attributes of SANGs

In order to have confidence that greenspace is of a suitable size and quality the following attributes will need to be met:

- SANG should be provided at a minimum target rate of 8ha per 1,000 new residents; this per ha standard is equivalent to 0.0192ha per dwelling (assuming an occupancy rate of 2.4 people per dwelling) or 1.9ha per 100 dwellings.
- SANGs should be effective and available to local residents at the point of occupancy.
- Sites with sports grounds, playing fields or children's play areas are unlikely to meet the criteria for SANG or if such features are present they should not be counted towards the per ha standard.
- Where sites have existing visitor use, this existing use will need to be taken into account when applying the per ha standard. This will require visitor survey data to be available. Sites are likely to have additional capacity where average visitor use is less than 1 person per ha per hour¹⁹. Where existing sites are already well used, there will be a need to demonstrate that the measures will be effective, and this may require some delivery upfront.

¹⁹ This provides a guide or approximate benchmark, typically busier than the relevant European sites but less than an urban park (see Liley, Panter and Rawlings, 2015). Sites will need to be considered on a case-case basis.

- The focus for the SANGs should be large sites of at least 40ha (which will accommodate suitably long routes), however smaller sites may work, depending on the location and quality.
- SANGs should provide parking that is free or significantly cheaper than parking at the European sites (noting that parking at all the East Devon Heaths car-parks is currently free). A guide to parking provision should be in the region of 1.5 spaces per ha of SANG²⁰.
- They should be quiet countryside locations, away from traffic noise, industrial sites, the airport etc. They should have a sense of space, openness and be viable alternatives to the European sites.
- They should contain a variety of habitats and be scenic, ideally with views.
- They should provide attractive, informal areas for dog walking: a range of walk lengths on relatively dry terrain, including at least 3km where dogs can be safely off the lead during the whole walk.
- They should provide routes that attract walkers, potentially including families. Walks are likely to need to be circuits with some interest (such as viewpoints, heritage features etc.).
- The site(s) should provide access all year round, without paths becoming waterlogged or inaccessible due to wet or muddy terrain.
- They should provide routes that work for cycling, potentially accommodating family cycling groups and mountain bikes as a low-key destination.
- Access points to the SANG(s) should be primarily within a 5km radius or 10 minute drive and easily accessible by road from the development they are intended to mitigate. Some direct foot access and good access routes for cyclists would be ideal. Direct access on foot would mean some SANG provision within around 500m radius of proposed housing locations.
- New SANGs should be recognisable as a 'destination' such that sporadic visitors are drawn from a wide area and such that the site also attracts more regular (at least weekly) visitors. As such they will need to be positively promoted and welcoming.
- On-site infrastructure could include the following as appropriate:
 - Small scale visitor centre/shelter (not necessarily staffed);
 - Interpretation (providing information about the area);
 - Wayfinding infrastructure to direct people around the site;
 - Some surfaced paths/boardwalks;
 - Wildlife viewing facilities (such as screens);

²⁰ This figure will depend on how close the SANG is to housing and the proportion of visitors that might arrive on foot or by bicycle. A busy SANG site might be expected to have up to 1 person visiting per ha per hour. Visitor data from the East Devon Heaths suggests on average a group would spend a little over an hour per visit and groups of 1.5 per car, suggesting a level of parking provision of around 0.6 spaces per ha to accommodate 1 person per ha per hour. Given that visitor numbers will not be constant every hour (i.e. there will be peak times of visiting) and easy parking is likely to be an important draw (meaning a need to ensure confidence to park), we suggest 1.5 spaces per ha.

- Range of paths (some waymarked) that provide a range of different routes and circuits, potentially including some longer routes for cycling (perhaps family groups and relatively low-key mountain bike circuits) but not such that other access (e.g. appeal to dog walkers) is compromised;
 - Access to water for dogs to drink, bathe and splash in;
 - Benches/informal seating;
 - Viewpoints;
 - Natural Play (particularly for larger, strategic SANG);
 - Catering facilities (particularly for larger, strategic SANG).
- SANGs will need to be promoted through a range of different ways, including signage, so that they are easy to find and local residents (both new and existing) are well aware of the site.
 - SANGs will need to provide access in perpetuity, and therefore require some legal mechanism to ensure this.
 - Sites with significant nature conservation interest (SSSI) or particularly vulnerable species present are unlikely to be suitable as SANG.
 - Provision of Sustainable Drainage Systems (SuDS) ponds within SANGs is not appropriate. SANGs provision is a separate obligation to public open space/SuDS policy requirements and is secured via different maintenance means other than resident fees.

Appendix 3: SANGs planning application principles (where SANG delivery is developer-led)

The following principles are adapted from the advice issued in Dorset (Dorset Council and BCP Council, 2020), with changes to reflect the local circumstance. The principles summarise the details that will be required by Natural England and the Local Planning Authority (LPA) at the time at which a proposal is considered, this may be either at outline or a full application where outline has not been submitted. Natural England will need to advise the authority that full details of the mitigation proposed are considered and secured:

- 1) SANG maintenance and function should be secured and demonstrated to be in place for perpetuity (effectively the development needs to maintain a level of mitigation for the duration of any impact, extending to at least 80 years).
- 2) Applications for developments requiring a SANG are likely to require a Change of Use application for the SANG itself. This may be done through a separate planning application.
- 3) When the Local Authority considers the application for the development that the SANG is designed to mitigate, it will need to be certain that the SANG:
 - meets the SANG criteria;
 - is deliverable, i.e. ownership and appropriate management is secured;
 - can be managed in a suitable condition in perpetuity;
 - will be monitored for the first 5 years.

This typically involves a draft Section 106 agreement, an implementation plan, long-term management plan and monitoring arrangements being submitted for agreement with Natural England and the LPA.

- 4) Where the application for development is at an outline stage the applicant will need to provide sufficient information on the SANG to allow the SANG proposal to be considered.
- 5) The SANG land will have been assessed for its biodiversity features and the applicant will have confirmed that the proposal will not in principle lead to net harm to biodiversity. Where harm to biodiversity features is predicted then the capacity of the SANG will need to be adjusted.
- 6) A full SANG Management Plan will be required as part of a reserved matters application if not previously provided at outline stage. This will set out the implementation and maintenance of the SANG – it will record initial infrastructure (photographically) and management objectives by compartment. This will allow for future evolution of the SANG within the broad SANG criteria rather than a rigid approach.

- 7) If part or all of the SANG is already accessible to the public a visitor survey will need to be submitted as part of the application (outline or full where no-outline is submitted), and the SANG capacity discounted if necessary
- 8) Where a SANG is not co-located with a proposal Natural England will provide advice to the applicant concerning the SANG capacity/catchment on a case by case basis. Guidance is available from the Thames Basin Heaths mitigation approach.

Natural England will provide written confirmation to the relevant authority that the proposed measures (SANG, SAMM) are appropriate to secure the necessary avoidance and mitigation measures and have been secured for a duration proportionate to the timescale of the development's effects.

SANG Visitor Monitoring

Large developments may come forward in phases, so monitoring should commence prior to first occupation where there is existing SANG use. It need not be when the land has no existing public access. Monitoring should be phased at two/three years after each substantive phase and also at five years after the development is completed. It may be the case that monitoring will need to include nearby European sites. The primary aims of visitor monitoring are to inform the SANG delivery and allow for adjustments as well as demonstrating the SANGs functionality and use by existing local residents. Effective monitoring will provide a robust baseline which can be observed in future strategic monitoring events.

From 5 years after the final phase of a development future SANG monitoring will be incorporated into the ongoing SAMM programme on a strategic basis. SANG monitoring methodology may include visitor questionnaires, remote sensors and observational studies.

Strategic Access Management and Monitoring (SAMM)

SANGs are not intended to avoid all new residents accessing the protected sites, rather to enable a neutral level of visitor pressure with an equal proportion of existing European site visitors users being diverted. It is therefore necessary, as established in the Thames Basin Heaths area and Dorset, for applicants to secure SAMM relative to the level of residential development. As for SANGs, the mitigation needs to be secured in perpetuity.

Appendix 4: Guidance for other off-site infrastructure projects

For small developments where there are no options for strategic SANG (and developments within Exeter where there is limited space and opportunities for new SANG), other infrastructure projects will be delivered by the LPA. These could include (but are not limited to):

- New footpath links, potentially joining up areas of existing space to make longer routes possible;
- Increases to the parking capacity or improvements to parking at existing sites;
- Dedicated facilities for dogs, such as fenced exercise areas, dog training areas etc;
- Improved access within sites – such as boardwalks, better paths, improved drainage etc to open up areas previously under-used or inaccessible;
- Better access to sites, such as road crossings, bridges, access routes etc.;
- Better promotion of existing sites, highlighting where new works or facilities have been undertaken (e.g. through events, gazetteers, road signs etc.);
- Making sites feel more safe and welcoming, for example by addressing anti-social behaviour, litter, dog mess or other issues.

Each LPA will maintain a rolling list of projects that will provide sufficient and effective mitigation for the growth coming forward and be in suitable locations to be relevant to new housing growth. The list could include projects within a green infrastructure strategy and ideas for projects could be generated from parish councils, community groups, NGOs and other suitable delivery bodies. Projects that are included on the list will need to have sufficient housing growth within a suitable catchment to ensure they can be funded, and delivery may need to be phased to ensure mitigation in line with local housing growth. Some projects may need to be established in advance of housing delivery if there is uncertainty around their effectiveness or potential for delivery. This would allow monitoring to determine the effectiveness.

Appendix 5: Draft Exeter City Council Project List

The table below has been provided by Exeter City Council and is a list of potential mitigation projects providing off-site green infrastructure

Project Name/Location	Project Description
Riverside Valley Park Access Improvement Project	<p><i>“There is significant value in attempting to increase the recreational capacity of the park, where appropriate, especially given that visitors numbers are expected to increase in the future due to nearby development allocations.”</i></p> <p>New unsurfaced paths in underutilised areas in the south of the survey area to spread usage. Improve links, connectivity and signage between Riverside, Northbrook Valley Park and Ludwell Valley Park. Improve signage outside the Valley Park to better advertise the location of the Valley Park and associated car parking. Additional car parking facilities, where feasible</p>
Riverside Valley Park Visitor Facilities and Information Hub Project	<p><i>“The creation of a visitor centre would likely encourage more visits from existing users and new users in the future. The centre could function as an educational hub as well as provide amenity services, including toilet facilities and food and drink provision”</i></p>
Riverside Valley Park Water Sports Improvement Project	<p><i>“The possibility of improving the park for water sports users could also be considered, as this is one of the activities that causes disturbance to the European sites, particularly the Exe Estuary SPA”</i></p> <p>New access points New routes Work with businesses Existing Exeter Quayside information point.</p>
Whitycombe Valley Park Access Improvement Project	<p><i>“Whilst the site is not suitable for SANG, the site still has a strategic role in providing publicly accessible natural greenspace for the surrounding communities who have relatively limited access to such sites in their local area. As such, enhancing access into the site may encourage more people to visit the park, rather than travelling to other sites, potentially including more sensitive European sites.”</i></p> <p>Improvement to existing access points, Measures to ameliorate muddy path surfaces Provision of dog bins</p>
Duryard Valley Park (Belvidere Meadows)	<p><i>“Whilst Belvidere Meadows is not suitable for SANG, the site still has a strategic role in providing naturalistic, nature-rich greenspace in close proximity to large residential areas. The site may provide some of the functions associated with a</i></p>

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Project Name/Location	Project Description
Access Improvement Project	<p><i>SANG site by allowing people to walk their dogs, access nature and enjoy far reaching views close to their homes, rather than travelling to other greenspaces such as European sites."</i></p> <p>Improve existing access points to make them suitable for wheelchairs, pushchairs, or other users with mobility issues. Additional signage / interpretation boards installation of dog bins could help encourage responsible use of the site by dog-walkers.</p>
Targeted Advertising Campaign	<p><i>"It is considered essential to advertise the presence of the Valley Parks, especially for new residents in Exeter who don't have familiarity with the local area. It is considered the deliverability of the option is high. This could be delivered through the Habitat Mitigation Strategy as LPA Projects."</i></p> <p>Leaflet to reach each new home with map. Function could be added to DWT's webpage page for the Valley Parks which could allow users to enter their postcode to determine which Valley Park is closest to their location.</p> <p>Estimated Cost: £20,000</p>

Appendix 6: SAMM costs

The table below summarises the mitigation measures as set out in the strategy and the relevant costs for each. These have been used to calculate the overall cost of mitigation. Costs are estimates only and intended to provide the overall level to set tariff, costs to be reviewed and updated as strategy implemented, and budgets adjusted according to housing growth.

Site	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
All	Delivery Manager		£65,750	20	£1,315,000	£45,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5,000 per annum support costs. 20 year timing covers plan period and just beyond, ensuring monitoring over key period taking place at least.
All	Wardens, team to scale up to 5		£210,625	80	£16,850,000	5 posts. £27,500 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5,000 per annum support costs. 80 year period ensures large budget for warden team. Potentially scope for size of team to be regularly reviewed and potential for it to shrink or expand as priorities require and ensure in perpetuity coverage.
All	Vehicles for warden team		£15,500	80	£1,240,000	2 x vehicle costs at: £250 per month to lease per electric vehicle, £1,500 for livery, £2,000 p.a. insurance, 5,000 miles p.a. at 0.25p per mile running costs/charging.
All	Devon Loves Dogs staffing costs		£91,000	25	£2,275,000	2 posts. £30,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5,000 per annum support costs. 25 year period ensures financial stability and long term employment well beyond current plan period
All	Resources for Devon Loves Dogs		£12,750	25	£318,750	vehicle costs at: £250 per month to lease per electric vehicle, £1,500 for livery, £2,000 p.a. insurance, 5,000 miles p.a. at 0.25p per mile running costs/charging. Additional costs of £5,000 to cover resources and equipment
All	Communications Officer staffing costs		£45,704	10	£457,039	1 post. £30,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5,000 per annum support costs. 10 year period to cover pulse of enhanced engagement work shift in comms.
All	DLD Website	£21,420	£1,000	20	£41,420	Indicative, estimated budget to cover creation of content, design, coding etc Costs cover whole plan period and extend beyond
All	South East Devon Wildlife (SEDW) Website	£21,420	£1,000	20	£41,420	Indicative, estimated budget to cover creation of content, design, coding etc Costs cover whole plan period and extend beyond

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Site	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
All	DLD Brand refresh	£7,500	£7,500	3	£30,000	Indicative budget to cover basic design. Overall cost allows for 3 refreshes (assuming potentially every 5-10 years. New gazebo/table/display equipment cyclical replacement every 5 years - £1,500
All	SEDW Brand refresh		£7,500	3	£22,500	Indicative budget to cover basic design. Overall cost allows for 3 refreshes (assuming potentially every 5-10 years.
All	Wardens projects		£5,000	25	£125,000	Flexible budget to cover acquisition of equipment (temporary signage, banners, art work, optics, tables, gazebos, display boards etc) or external support as needed. Varying per year as to relevant campaigns etc.
All	Production of monitoring strategy & monitoring support	£7,000	£2,000	25	£57,000	Initial budget to cover support to warden team and delivery manager to ensure robust monitoring protocol and recording forms; with small annual budget to help with reporting in subsequent years
All	Visitor survey		£30,000	5	£150,000	Cost allows for 5 repeat surveys - potentially one survey every 5 years for 25 years.
All	SANGs and Infrastructure Projects Coordination Officer		£53,600	15	£804,000	£36,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5,000 per annum support costs. 15 year timing covers plan period.
All	Admin and accountancy support		£3,600	50	£180,000	£3,300 per year for accounting and £300 per year for housing monitoring
Exe	Codes of Conduct	£14,000			£14,000	6 existing codes plus one new code; £2,000 per code to cover design, printing and distribution. Some consultation with user groups may be required. Potential for economies of scale (e.g. re distribution)
Exe	Exe Leaflets		£800	2	£1,600	4 leaflets, £1,500 for each leaflet to cover printing and design/refresh (SEDHRP/EEMP quote 2022).
Exe	Schools	£5,000	£2,000	20	£45,000	Rounded figure providing sufficient budget to allow review of existing education work around the estuary and work to produce new education material. Rolling costs allow annual budget to help cover cost of supporting school visits etc. Assumption is that other funding (e.g. from schools) may be available and delivery by existing staff/organisations, potentially with some input from warden team. Timing to cover at least Plan period
Exe	Managing access at sensitive locations		£10,000	20	£200,000	Some work required to confirm costs and nature of projects and these likely to change over time. Indicative budget that may need review and further refinement over time. Costs could be pooled across years.
Exe	Patrol boat	£10,000	£8,000	25	£210,000	Capital costs to cover necessary replacement. Estimated at £10k to cover swapping of current boat for RIB (Highfield Patrol 540 or similar). Over time likely requirement to

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Site	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
						change to electric outboard. Rolling costs to expand use and cover fuel, officer training, maintenance and other associated costs (marina berth). Costed to cover well beyond Plan period.
Exe	Ongoing repair/maintenance of buoys at refuge	£15,000	£2,000	25	£65,000	One off cost to cover repairs to existing buoys, design and production of lettering to go on buoys to ensure clear guidance for anyone approaching the refuge (e.g. canoeists, folk on paddleboards, walkers etc); rolling cost to provide budget for replacement, repair and maintenance (actual cost likely to vary between years)
Exe	Stakeholder engagement		£2,000	25	£50,000	Role of Delivery Manager to undertake more strategic engagement, additional costs required for wider costs on annual basis, such as venue hire and support for other bodies such as EEMP and the forum (held twice a year)
Exe	Review of signage and new/improved signage	£12,000			£12,000	Role for Delivery Manager to undertake review and identify locations, with budget to cover implementation where required. New signage likely to involve discs or similar to convey specific instructions (such as dogs on leads) or way-marking.
Exe	New interpretation	£30,000	£30,000	2	£90,000	£3,000 per board for production of timber frame and graphic panel, delivery and installation. Estimate of 10 boards across Warren and Exe. Rolling cost assumes 10 year lifespan per board with costs staggered over time
Exe	Refuge monitoring		£20,000	4	£80,000	Estimated cost of £20000 per survey by consultancy or similar in line with previous surveys to allow direct comparison, budget allows for 4 repeats
Exe	Vantage point counts		£250	20	£5,000	Low cost but budget necessary to provide printed forms or hosting/software etc if done on tablets. 20 year timing covers plan period and just beyond, ensuring monitoring over key period taking place at least.
Exe	Web Camera		£12,000	5	£60,000	Estimated cost based on other examples/projects. 5 year period provides opportunity to use as a novel way to raise awareness and promote importance of estuary for wildlife
East Devon Heaths	Additional dog bins	£2,000	£2,000	25	£52,000	Costs to cover provision and emptying
East Devon Heaths	Review of parking charging	£15,000			£15,000	Estimated budget for review

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Site	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
East Devon Heaths	Special projects pot		£25,000	15	£375,000	Estimated rolling budget to provide annual budget for specific projects, targeted as needed
East Devon Heaths	Signage		£2,000	25	£50,000	Rolling budget with potential to pool across years and extending well beyond plan period
East Devon Heaths	Interpretation	£44,000	£4,400	15	£110,000	£3,000 per board for production of "Primary" timber frame and graphic panels, estimate of 10 boards. £2,000 per board for production of "Secondary" timber frame and graphic panels, estimate of 7 boards. Rolling cost assumes 10 year lifespan per board with costs staggered over time
East Devon Heaths	Fire strategy work and review	£15,000			£15,000	Cost to provide budget for consultancy to undertake review
East Devon Heaths	Education work around fire	£10,000	£5,000	25	£135,000	Initial cost to provide funds to develop material with rolling budget to cover implementation (e.g. schools visits etc) and extending well beyond plan period
East Devon Heaths	Advice/specialist input re management interventions around dog walking	£5,000			£5,000	Budget to cover specialist consultancy input
East Devon Heaths	Resources for work with commercial dog walkers	£10,000			£10,000	Budget to cover specialist consultancy input
East Devon Heaths	Monitoring: ecology (birds, Southern Damsel fly)	£2,000			£2,000	Budget to simply help supplement existing work - e.g. mileage for volunteers
East Devon Heaths	Monitoring: people behaviour	£10,000			£10,000	Budget to commission single survey involving direct observation of visitors from a range of vantage points, to cover a range of times and days
East Devon Heaths	Monitoring: vehicle counter data collection	£20,000	£500	20	£30,000	Cost for around 10 counters for a selection of car parks, assuming £1,000 per counter, replaced every 10 years with additional budget for installation. Costs for basic counter with data logger in protective housing (post).

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Site	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Dawlish Warren	Visitor facility at Dawlish Warren	£100,000			£100,000	Uncertainty around design, location etc. Indicative figure allowing contribution towards larger cost (e.g. match funding) for visitor centre or could be used to fund lower key shelter or similar to act as focal point for engagement. Budget sufficient to fund a roofed shelter rather than full-scale centre but how funding used dependent on opportunities and how Dawlish Warren continues to change.
Dawlish Warren	Flexible projects pot		£10,000	15	£150,000	Indicative budget that may need review and further refinement over time. Costs could be pooled across years.
Dawlish Warren	Petalwort monitoring and survey		£2,000	10	£20,000	Cost dependent on monitoring strategy; indicative cost allows for specialist consultancy and small surveys and assumption of 10 repeats.
Dawlish Warren	Maintenance of high tide roost at Dawlish Warren	£30,000			£30,000	Indicative cost and will be dependent on how the roost changes over time. Potential to implement anything will be dependent on the outcomes of Environment Agency work and may not be possible.

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Equality Impact Assessment: South East Devon Wildlife – Joint Habitats Sites Mitigation Strategy

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. 08.07.2025	South East Devon Wildlife – Joint Habitats Sites Mitigation Strategy	That the Executive recommends that Council approves the adoption of the South East Devon Wildlife Joint Habitats Sites Mitigation Strategy 2025 – 2030.	South East Devon Wildlife – Joint Habitats Sites Mitigation Strategy sets out a partnership approach to deliver mitigation for impacts on sites designated for their exceptional nature conservation importance. The Strategy does

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
			<p>not set out planning policy and the Exeter Plan, to which the Strategy refers, has been the subject of its own approval processes, including EQIA.</p> <p>On this basis, groups with specific, protected characteristics are not considered to be affected by the recommendation to approve the Strategy.</p>

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	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.
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	This group is not considered to be affected by the recommendation to approve the Strategy.
Sex/Gender	Neutral	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.
Gender reassignment	Neutral	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.
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	This group is not considered to be affected by the recommendation to approve the Strategy.

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	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.
Marriage and civil partnership status	Neutral	N/A	This group is not considered to be affected by the recommendation to approve the Strategy.

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

N/A

Officer: Jill Day, Principal Project manager (Local Plans)

Date: 8 May 2025

SEATING IN THE GUILDHALL

		Deputy Lord Mayor Councillor Rolstone (L)	Chief Executive	Lord Mayor Councillor Jobson (C)	Democratic Services Officer	Service Lead Legal Services	S151 Officer
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Democratic Services Officer				Strategic Directors	Strategic Directors	Strategic Directors
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<u>Councillors</u>	<u>Councillors</u>	<u>Councillors</u>		<u>Councillors</u>	<u>Councillors</u>
Darling (L)	Miller-Boam (L)	Bialyk (L)		Moore (G)*	Holland (C)
Atkinson (L)	Snow (L)	Wright (L)		Mitchell, M.N. (LD)*	Sheridan (C)
Begley (L)	Hussain (L)	Wood (L)		Fullam (LD)*	Palmer (LD) *
Harding (L)	Parkhouse (L)	Williams, R.T. (L)	TABLE	Mitchell, K (LD)*	Banyard (G) *
Cookson (L)	Pole (L)	Vizard (L)		Read (G)*	Wetenhall (G) *
	Knott (L)	Foale (L)		Rees (G)*	Bennett (G)*
				Ketchin (G)*	

	Cllr Williams M.J. (L)	Cllr Wardle (L)	Cllr Asvachin (L)	Cllr Patrick (L)	Cllr Payne (R)		Haigh (I)**	Hughes(I)**
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L:	Labour:	22
G:	Green:	7*
LD:	Liberal Democrat	4*
C:	Conservative:	3
I:	Independent	2**
R:	Reform	1

* Known as the
Progressive Group

** Known as the
Independent
Equity Group

Portfolio Holders

Bialyk:	Leader
Wright:	Deputy Leader and Corporate Services, Community Safety &
Vizard:	City Centre
	Climate, Ecological Change and Communities
Williams, R.T:	City Management
Asvachin:	Housing, Homelessness Prevention & Customer Services
Wood:	Leisure Services and Healthy Living
Foale:	Arts, Culture & Tourism
Patrick:	City Development