

EXECUTIVE

Date: Tuesday 20 May 2025

Time: 5.30 pm

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

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

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

Entry to the Civic Centre can be gained through the Customer Service Centre, Paris Street.

Membership -

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

Agenda

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

1 Apologies

To receive apologies for absence from Committee members.

2 Minutes

To approve and sign the minutes of the meeting held on 1 April 2025.

(Pages 3 -
8)

3 Declarations of Interest

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

4 Local Government Act 1972 - Exclusion of Press and Public

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

RECOMMENDED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure

of exempt information as defined in the relevant paragraphs of Part 1, Schedule 12A of the Act.

5 Questions from the Public Under Standing order No. 19

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

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

6 Request for a variation of Hackney Carriage Fares

To consider the report of the Strategic Director of Operations. (Pages 9 - 26)

7 Review of Equality, Diversity and Inclusion Policy

To consider the report of the Strategic Director for People and Communities. (Pages 27 - 46)

8 Disposal report seeking authority to dispose of the former Clifton Hill Leisure Centre.

To consider the report of the Strategic Director of Corporate Resources. (Pages 47 - 72)

Date of Next Meeting

The next scheduled meeting of the Executive will be held on **Thursday 19 June 2025** at 5.30 pm in the Civic Centre.

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

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

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EXECUTIVE

Tuesday 1 April 2025

Present:

Councillor Bialyk (Chair)

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

Also Present:

Councillor Jobson (as an opposition group Leader);

Councillor Moore (as an opposition group Leader); and

Councillor M. Mitchell (as an opposition group Leader)

Also present:

Strategic Director for Corporate Resources, Strategic Director for People and Communities, Head of Legal and Democratic Services & Monitoring Officer, Head of Service - Digital and Data, Head of Service - Customers and Communities and Democratic Services Manager.

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MINUTES

The minutes of the meeting held on 4 March 2025, were taken as read, approved, and signed by the Chair as a correct record.

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DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

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QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

No questions from members of the public were received.

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CHAIRS ANNOUNCEMENTS

The Leader advised Members of a recent hospital visit and expressed his gratitude to the NHS and commending the efficiency of the service provided.

34

REVIEW OF CORPORATE RISK REGISTER

The Executive received the report on the Council's risk management progress and presented the revised Corporate Risk Register which was linked to the Council's Strategic Priorities. The Audit and Governance Committee had considered the report at its meeting on 19 March 2025, where it has been suggested to include a direction of travel indicator for risk scores, which would be incorporated in the next update.

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

- the Public Sector Decarbonisation Scheme (PSDS) funding for the Riverside had been approved, resulting in a £3.6 million grant award from the Department of Energy, Security and Net Zero. The funding would contribute significantly to decarbonising public sector facilities and the Council's previous prudent decision making was highlighted;
- a new Head of Service for HR had been appointed, and the HR improvement plan was now underway; and

- the register required an amendment to ensure that the Portfolio Holder for Arts, Culture & Tourism was listed for the relevant risks associated with that portfolio.

Opposition group leaders raised the following points and questions:

- the suggestion from the Audit and Governance Committee, highlighted the benefit in indicating text amendments in the document to help members track where changes had been made between meetings.

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

RESOLVED that the Council's Corporate Risk Register be approved and that any necessary actions to help mitigate the risks for which it is responsible for be proposed to Council.

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UPDATE ON THE DIGITAL CUSTOMER STRATEGY

The Executive received the report on the update and progress to date of the Digital Customer Strategy. The strategy was vital for delivering Member aspirations for customer-focused services, emphasising the importance of a culture of excellent customer and digital service, digital equality, and efficient processes.

Members received a presentation (appended to the minutes), and particular points discussed included:

- the Digital Customer Strategy (DCS) was adopted in December 2023, and focussed on user experience, customer-focused services, digital equality, and efficient processes;
- pre-adoption work included providing a gateway for non-standard service requests, improvements to the 'contact us' form on the council website, the rollout of Microsoft 365, reduction of mailbox sizes, and audits on digital equality and data use;
- there were 10 DCS goals which included outcomes and priority actions;
- the formation of dedicated teams within the People and Community Directorate, with additional staff recruited in Spring 2025;
- the Council adopted the Strata Business Plan 2024-2025 which supported delivery of the DCS in a number of ways including:; the rollout of a new end-user computer, replacing Skype with Teams, a new customer relationship management platform, Enterprise Middleware Architecture for data integration, replacing the intranet and document management systems with SharePoint and bookings/notifications for customer updates and reminders;
- the MyExeter Platform was launched in January 2025 and provided joined-up channels for customer interactions. Garden waste services have been successfully piloted with waste management services to follow;
- over 2,000 users have signed up to MyExeter providing positive feedback on the seamless user experience, and plans are under development to include a wide range of other services;
- having central customer records allows officers to access personalised information, be able track customer interactions and make improvements in resolving enquiries;
- all staff moved from Skype to Teams telephony in February 2025;
- a new CX One Contact Centre Platform was procured in December 2024 and was scheduled to go live in Exeter in Spring 2025;

- the CX One Contact Centre will allow better integration and communication channels, with AI virtual assistants also automating back-office processes.
- a new Customer Charter was scheduled for 2025 and both customer and Councillor involvement will take place to craft the charter and set standards for high-quality customer experiences;
- having secure data measures was a priority for the Council and would involve regular audits completion of the cyber assessment framework, and rollout of cybersecurity training; and
- the Council had made a significant capital investment to enable the delivery of the Digital Customer Strategy.

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

- would there be an App developed for residents to improve access to services?
- mailbox sizes were affecting Councillors' ability to manage casework;
- how would digital equality be put into practice?
- had mobile phone access been given more priority due to the likelihood of more residents having one and had the system been designed around this?
- there were some concerns about the phasing out of the global desktop for Members;
- Member training for cybersecurity would be necessary going forward;
- the update report and work undertaken to date was commended; and
- there was a need to address unique identifiers and links between users who lived in the same location with different subscriptions.

The Leader requested that a briefing session be arranged for Members to provide them information on the digital strategy and mailbox management.

Opposition group leaders raised the following points and questions:

- was the system compatible with neighbouring councils, notably for future planning with the Councils plans for Local Government Review;
- was there any system vulnerability and suitable backup in place?
- how would digitally excluded residents be supported?
- how were benchmarking and quality standards being addressed for the website, including the use of plain English?
- would there be an opportunity to include translation services for residents?
- how would chatbots be assessed to ensure they worked efficiently, given the allocated budget of £17,000?
- reassurance was sought on the prevention of sharing personal data for residents in an HMO; and
- there were residents who were potentially digitally excluded and required human contact for service delivery.

In response to questions and points raised by Members, the Strategic Director for People and Communities, the Head of Service for Digital and Data and the Head of Service - Customers and Communities advised that: -

- there were financial implications for data storage, notably for mailbox sizes as the Council moved to cloud-based systems. There is a legal duty to only store for the minimum amount of time necessary and whilst it is initially difficult it is important for officers a Members alike to manage their inboxes within the approved size limits.

- the rationale for this is set out in the data strategy which had been developed to improve data quality, governance, and rules for data retention. A programme to educate staff and Members on data management will be provided as part of the strategy implementation;
- the rollout of SharePoint and a data warehouse would also support the Council in ensuring compliance with data standards;
- the transition from the global desktop to new end-user computing systems, involved extensive testing and planning, with a focus on priority services and customer-facing staff;
- the global desktop was outdated and with several vulnerabilities, requiring a move to more secure and efficient technology;
- there were challenges in integrating council devices and systems and engagement with Strata and other councils to resolve issues was ongoing;
- digital equality was a priority, and efforts would be made to make staff available to focus on supporting those needing one-to-one contact;
- Exeter was noted as being a digitally evolved city, but there were still ongoing efforts to address digital exclusion through service transformation and consultations, and the engagement strategy consultation would also look at addressing these issues on an on-going basis;
- the underlying technology would enable all three authorities to deliver on their digital ambitions despite differing transformation strategies. The technology and move to a cloud-based system provided a foundation for future service integration for any potential future authority;
- there was a challenge for unique identifiers in households, particularly with mobile devices, and the importance of ensuring proper security in system design was a priority being worked on;
- the effectiveness of chatbots was dependant on the quality of the core data and learning from other Councils, work was being undertaken to improve data quality before any chatbot implementation;
- there would also be a focus on ensuring chatbots did not block access to services to ensure human support was available as needed; research had shown that when a chatbot was not resolving a customer enquiry, a swift transfer to an alternative channel was the best customer outcome;
- the Strata Business Plan 2025-26 included the development of an App, to improve communications with residents, providing updates on council services, and included waste management;
- the importance of holding briefings for Members was highlighted and the communications team was providing support;
- a Digital Service Officer was responsible for ensuring website content was in plain English and ensuring common standards across all services;
- the website had translation services for all users and the team was working on chatbot integration to address missing elements on the website;
- although the Council website scored well on independent assessments, there were plans to simplify navigation further;
- the Council planned to engage in more benchmarking activities with other authorities to help improve standards;
- over the past 18 months, a lot of work had been undertaken to align services, with a focus on high demand areas, notably council tax, and housing information. It was intended to integrate these into a single portal by the end of the year; and
- although the team had been cautious in promoting the changes to focus on quality, plans were in place to engage Members in April 2025 to seek feedback and support in communication.

The Leader thanked the Strategic Director for People and Communities, the Head of Service for Digital and Data and the Head of Service - Customers and Communities for the detailed presentation and work undertaken.

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

RESOLVED that the Executive noted the report.

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DATA STRATEGY

The Executive received the report which outlined the Council's approach to using data to achieve its strategic goals and was intended to align with the adopted Digital Customer Strategy and the revised draft Corporate Plan 2025-2028.

Reference was made to the importance of the data strategy for data security, appropriate use and that efforts had been made to ensure it was understandable and clear.

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

- interest was expressed in how data collection could streamline services and manage issues such as fly-tipping;
- were Councillors responsible for their own data control and protection? and
- the extent of efforts in meeting the needs of all customers was commended.

Opposition group leaders raised the following points and questions:

- would public databases be updated, notably for tree protection orders and heritage assets, which had not been updated in many years;
- the report advised that there would be no environmental impacts, but data servers would create carbon issues, which needed to be addressed;
- was the budget for the strategy sufficient?
- a query was raised on a potential typo in the report appendix; and
- did the strategy adhere to any imposed template by central government or other public document?

In response to questions and points raised by Members, the Strategic Director for People and Communities advised that:

- there was a challenge in making data publicly available;
- there was a focus on improving the quality of information on the website,
- there were further difficulties in recruiting individuals with digital skills to undertake the work due to competition with the private sector. However, partnership work with other councils and Strata was on going on project-by-project basis;
- Strat costs the council around £2 million revenue a year which is a sufficient budget, and the partnership arrangement provides economies of scale, aiding a timely delivery;
- Exeter's initial focus was on infrastructure before making changes to front line services: partner councils have taken other approaches and whilst collaboration had been effective discussions were being held with Strata on potential changes in the approach to increase the pace of delivery on some projects.;

- the carbon impact assessment was an issue which had been discussed with Strat Board a, who have committed to further work with all three local authorities to assess carbon impacts, which had previously been a challenge to assess.

The Deputy Leader and Portfolio Holder for Corporate Services and City Centre, confirmed that Councillors were the data controllers and suggested that Members should receive a briefing on the subject.

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

RECOMMENDED that Council approve the Data Strategy as set out in Appendix A of the report presented at the meeting.

(The meeting commenced at 5.30 pm and closed at 6.40 pm)

Chair

The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 15 April 2025.

REPORT TO EXECUTIVE

Date of Meeting: 20 May

Report of: Strategic Director of Operations

Title: Request for a variation of Hackney Carriage Fares

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 The purpose of this report is to inform the Executive Committee that a request has been made via the Chair of Exeter St Davids Hackney Carriage Association, for an increase to the Hackney Carriage Fare Tariff.

1.2 The Executive is asked to consider a request for the variation of the table of fares for the hire of hackney carriages and to determine whether to proceed to public consultation.

2. Recommendations:

2.1 That the Executive approves:

(1) That the proposals are put out to public consultation to run from 27 May 2025 until 24 June 2025 (4 weeks);

(2) That a public notice containing the proposed variation table is published in one local newspaper during the above period; and

(3) The matter is brought back to Executive on 12 August 2025 for determination, where there are representations.

3. Reasons for the recommendation:

3.1 When considering the proposal, members are reminded that the tariff that is set should be regarded as the maximum fares that can be charged. Taxi proprietors are not tied to charging the maximum fare but are not permitted to charge more than the tariff price shown on the meter. Market forces are known to come into play, and for instance because of the level of competition in Exeter, the driver/ proprietor may decide to charge less than the maximum tariff.

3.2 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 sets out the public notice requirements, but it is for the Executive Committee to determine whether or not such a consultation should be undertaken based on the proposed tariff table.

4. What are the resource implications including non financial resources

4.1 There will be a cost in the public consultation of the proposed tariff table as we would be required to place an advert in a local newspaper and also propose to put signs on the taxi rank notice boards, and to email all dual Hackney Carriage Private Hire drivers and local disability support groups.

4.2 The associated newspaper advert costs (in the region of £600), as well as the staff costs from the additional work generated by the consultation are additional costs not budgeted for within the last fees and charges report, and as such these additional costs will need to be considered at the next fees and charges review to avoid Licensing costs impacting on the Council's general fund.

5. Section 151 Officer comments:

5.1 As vehicle licensing is required to be self-financing, the financial implications contained within this report will be contained within the ringfenced account. This is required to break even over a three-year period.

6. What are the legal aspects?

6.1 Section 65 Local Government (Miscellaneous Provisions) Act 1976 gives the Executive Committee power to determine hackney carriage fares. The power is not delegated to officers.

6.2 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 also sets out the public notice requirements, but it is for the Executive Committee to determine whether or not such a consultation should be undertaken based on the proposed tariff table.

6.3 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 also sets out the formal statutory procedure for varying the fares requires. The Council is required to publish a notice containing the proposed variation table in at least one local newspaper and specify a period of not less than 14 days from the first publication of the notice during which time objections to the variation can be made.

6.4 It is for the Executive Committee to determine whether or not such a consultation should be undertaken based on the proposed tariff table. It is also for the Executive Committee to determine the length of any consultation.

6.5 Section 17 Crime and Disorder Act 1998 places the council under a duty to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

6.6 The Human Rights Act 1998 requires UK legislation to be interpreted in a manner consistent with the European Convention on Human Rights. It is unlawful for the council to act in a way that is incompatible (or fail to act in a way that is compatible) with the rights protected by the Act. Any action undertaken by the council that could have an effect upon another person's Human Rights must be taken having regard to the principle of Proportionality - the need to balance the rights of the individual with the rights of the community as a whole. Any action taken by the council which affect another's' rights must

be no more onerous than is necessary in a democratic society. The matter set out in this report must be considered in light of the above obligations

7. Monitoring Officer's comments:

7.1 This report raises no issues for the Monitoring Officer.

8. Report details:

8.1 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 permits Licensing Authorities to set the fares tariff for Hackney carriages (taxis) licensed in the district. The tariff sets the maximum fares that taxis can charge the public when using their vehicles.

8.2 Exeter City Council, in common with most other Councils, have used this power for many years and the last tariff increase was agreed in November 2022. A copy of the proposed tariff table calculation is found at Appendix A. The cost on a per mile basis is found at Table B of Appendix B to this report. To aid comparison the existing 2022 fare table is also included at Table A of Appendix B.

8.3 Since the 2022 tariff change the subject of fare increases has been regularly discussed at Taxi Forum meetings. Throughout this time, the taxi trade's opinion was generally divided in view of the economic situation that some did not wish to see a fare increase as the costs for fares are met by the public using taxis. However, due to increased operating costs it was decided to undertake a fare review in conjunction with the Exeter Hackney Carriage Associations in Autumn 2024.

8.4 The agreed proposal is outlined below:

- An increase in both the flag fall and the daytime tariff 1.
- An increase in both the flag fall and the evening tariff 2.
- An increase in both the flag fall and the weekend and holiday tariff 3.
- The addition of Christmas Day and New Years Day to Tariff 3.
- The complete removal of Tariff 4.
- Retention of the current charge for additional passengers above the first one.
- The introduction of charges for items of luggage (Not to include shopping bags).

8.8 Officers have researched and produced a comparison table of current fares set by this and other authorities in Devon (Table C of Appendix B). The comparison takes into account the position of highest to lowest fares set by all 358 licensing authorities in England and Wales based upon costs of the first two miles journey prepared by the national Private Hire and Taxi Monthly magazine. The present Exeter Tariff 1 cost for a two-mile journey is £7.50.

8.9 The table confirms that Exeter currently has the joint fifth most expensive 2-mile fare level in Devon and is the 133rd most expensive fare in England and Wales over that distance. If the proposed increases are implemented, then Exeter would have the most expensive 2-mile fare level in Devon and would move to approx. 10th position in the national list.

8.10 This Council has not reset its fares since 2022, other authorities have increased fares in 2022, 2023 and 2024.

- Plymouth reset their taxi fares in 2023 and are 60p more expensive than the current Exeter tariff 1;
- South Hams Councils reset their taxi fares in 2022 and are currently 30p more than Exeter's current two-mile fare;
- East Devon DC increased their tariff fare in 2020, 2022 and 2024 to £8.69, £1.19 more than Exeter's current two-mile fare;
- Teignbridge DC also raised their fares in 2022, to £7.26, some 24p less than Exeter for a two-mile fare.

8.11 Members may find it useful for an explanation of the current tariff structure operated in this district and there are currently four Tariff levels

- Tariff 1: Applies to any hiring begun between 0700 and 1900 on any day other than Sunday, Public Holidays or Bank Holidays;
- Tariff 2: Applies to any hiring begun on any day (other than Easter Sunday and Public and Bank Holidays) between 1900 and 0700 the following day AND for any hiring on a Sunday from Midnight. This tariff also applies between 0700 and 1900 on Christmas Eve and New Year's Eve;
- Tariff Three: Applies to any hiring begun on Christmas Eve & New Year's Eve from 19.00 until 00.00 AND from Midnight until 07.00 New Year's Day; Good Friday; Easter Sunday; Easter Monday; Mayday; Spring & August Bank Holidays; Christmas Day, Boxing Day.
- Tariff Four: Applies on Christmas day (24 hours) and New Year's Day from midnight to 7am.

8.12 The proposed tariff structure would be as follows:

- Tariff 1: Applies to any hiring begun between 0700 and 1900 on any day other than Sunday, Public Holidays or Bank Holidays;
- Tariff 2: Applies to any hiring begun on any day (other than Easter Sunday and Public and Bank Holidays) between 1900 and 0700 the following day AND for any hiring on a Sunday. This tariff also applies between 0700 and 1900 on Christmas Eve and New Year's Eve.
- Tariff Three: Applies to any hiring begun on Christmas Eve & New Year's Eve from 19.00 until 00.00 AND Good Friday; Easter Sunday; Easter Monday; Mayday; Spring & August Bank Holidays; Christmas Day, Boxing Day, New Year's Day.
- Tariff Four: Will be removed in its entirety.

8.13 The consultation period to take place between 27 May 2025 and 24 June 2025. A public notice will be published on our website and a public notice will be published in a local newspaper as required by statute. Those wishing to engage in the consultation will be able to do so in writing either by email to the Licensing Team by email to licensing.team@exeter.gov.uk or by post to Licensing Team, Civic Centre, Paris Street, Exeter EX1 1RQ.

8.14 The draft notice is attached as Appendix C.

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

9.1 The appropriate setting of a taxi tariff table will contribute to a healthy and safe city, and lend support to a robust, business friendly economy

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

10.1 The publication of a proposal to increase taxi fare levels may lead to criticism by members of the public who rely on such services and are resistant to such changes.

10.2 However, the proposed tariff table has been developed in conjunction with the taxi trade rather than solely by the Licensing Authority, and in the event of adverse consultation responses this matter would be referred back to the Executive Committee for further consideration

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 impact 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 It was estimated in March 2021 that the transport sector accounted for 29% of the UK's net greenhouse gas emissions (Source: 2020 UK Greenhouse Gas Emissions). The Licensing Committee have previously set ambitious emissions targets for the Exeter Hackney carriage fleet, making it amongst the greenest Hackney carriage fleets in the country. The most recent emissions standards from our taxi policy fully came into effect on 1 January 2020.

12.2 With further reductions in greenhouse gas emissions from transport in mind, it is highly likely that the Licensing Committee will wish to consider introducing furthermore ambitious emissions targets for Exeter Hackney carriages in the future, and having an appropriate fare table would contribute considerably to the financial viability of any such changes for the Hackney carriage trade.

13. Are there any other options?

13.1 The Executive Committee may reject the request for consultation on the proposed tariff and instead maintain the existing tariff table. However, this may lead to the taxi trade in Exeter becoming economically unattractive to new taxi drivers/ proprietors and hence effect the trade as a public transport service.

Strategic Director of Operations, Adrian Pengelly

Author: Simon Lane, Service Lead – Waste and Environment

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

Background papers used in compiling this report:-

- Department for Business, Energy and Industrial Strategy: 2020 UK Greenhouse Gas Emissions, provisional figures.
- Private Hire and Taxi Monthly National Hackney Fares table (April 2025).
- Local Government (Miscellaneous Provisions) Act 1976

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

LIST OF APPENDICES:

- APPENDIX A – Fare Calculation
- APPENDIX B – Proposed, existing and comparison fare tables.
- APPENDIX C – Draft Notice
- APPENDIX D – Equalities Impact Assessment

Exeter Hackney Carriage Fares Calculator 2024

ITEM	Average Running Costs Per Vehicle		Flag Drop	ITEM	Enter Variable Data in Pink Boxes on this sheet and "Calc for running costs"	
1	Annual Salary (A)	£34,840.00	T1 3.80	A	Average Salary	£34,840.00
2	Average Running Costs (B X E)+ (C + D + G + H + I)	£24,103.69	T2 4.60	B	Costs of Running Diesel Car (per mile)	£0.74 (From "Calc for running costs")
3	Total Running Costs (1 + 2)	£58,943.69	T3 5.00	C	Additional Allowance for Insurance	£2,500.00
4	Average Live Mileage (E - F)	13,030.00	T4	D	Annual cost of Hackney Carriage Licence	£430.00
5	Cost per mile 3 ÷ 4	£4.52		E	Annual Average Mileage	26,060.00
6	Total Charge per Mile (3 - K x T1) ÷ 4	£3.00	£3.75	F	Dead Mileage	50% 13,030
	Charge for each Distance Unit is	Tariff 1	Tariff 2	G	Annual Station Rank Fee	£670.00
	(incorporating flag drop)			H	Annual Cost of Driver's Licence (Pro-Rata)	£135.00
	59 yards (L) =	10.00 pence	10.00	I	Average annual cost of Livery, Roof Sign and Meter	£1,130.00
	(6 ÷ M)			J	Average Journey Distance (Miles)	2.5
7	Round to nearest 10 pence	10 pence	10	K	Average number of journeys	5212.00
	Rounded Charge per Mile	£3.00	£3.75			
	Charge for time per unit	0	0			
	Charge for time. One mile or	minutes		L	Distance unit = Unit charge x (1760/charge per mile)	Tariff 1 59 yards Tariff 2 47 yards
	and	seconds		M	Units per mile (1760/Unit Distance)	30.04 37.55
	Date fare chart effective from	Day 1	Month 8	N	Charge per unit (input values from 7)	10.00 pence 10.00 pence
		Year 2025		O	For each passenger in excess of one (pence) (As agreed by officers in consultation with trade)	50 pence
				P	Soiling the carriage leaving it unfit (pounds) (As agreed by officers in consultation with trade)	£100

Version 2

Last Verified Jan 2025

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Appendix B

Table A – Existing Exeter Fares

Existing Fare Calculation for Exeter							
	Flag Drop	Distance Unit	First Mile	Running Mile	2 miles	3 miles	5 miles
Tariff 1	£2.70	72 yards	£5.10	£2.50	£7.60	£10.10	£15.10
Tariff 2	£3.20	57 yards	£6.20	£3.10	£9.30	£12.40	£18.60
Tariff 3	£4.00	46 yards	£8.50	£3.80	£12.30	£16.10	£23.70

Table B – Proposed Exeter Fares

Proposed Fare Calculation for Exeter							
	Flag Drop	Distance Unit	First Mile	Running Mile	2 miles	3 miles	5 miles
Tariff 1	£3.80	176 yards	£6.50	£3.00	£9.50	£12.50	£18.50
% Increase	40%		27%	20%	25%	24%	22%
Tariff 2	£4.60	176 yards	£8.00	£3.80	£11.80	£15.60	£23.20
% Increase	44%		29%	22%	27%	25%	25%
Tariff 3	£5.00	176 yards	£9.05	£4.50	£13.55	£18.05	£27.05
% Increase	20%		6.5%	18%	10%	12%	14%

Table C – Devon Authorities Comparison

Council	2 Mile Tariff	Position in National League Table	Last Increase
North Devon	£7.30 (6)	153	2022
East Devon	£8.69 (1)	29	2024
South Hams	£7.80 (3)	96	2022
Teignmouth	£7.26 (7)	158	2022
Plymouth	£8.10 (2)	63	2023
Bristol	£7.60 (4)	114	2023
Mid Devon	£6.80 (8)	223	2021
Exeter (Current)	£7.50 (5)	133	2022
Exeter (Proposed)	£9.50	10	2025

Position in brackets indicated position in Southwest Authorities

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EXETER CITY COUNCIL

Local Government (Miscellaneous Provisions) Act 1976 - Section 65

Notice is hereby given that the Council intends to authorise an increase in the table of fares for journeys by Hackney Carriages and metered Private Hire vehicles in accordance with the schedule set out below.

SCHEDULE OF AUTHORISED FARES

Tariff	Fare	Details
Tariff One (T1)	£3.80 for the first 176 yards (or part thereof) and £0.30 for each subsequent 176 yards (or part thereof).	Applies to any hiring begun between 07.00 and 19.00 on any other day other than Sunday or Bank Holidays.
Tariff Two (T2)	£4.60 for the first 176 yards (or part thereof) and £0.38 for each subsequent 176 yards (or part thereof).	Applies to any hiring begun (other than Easter Sunday and Public and Bank Holiday's) between 19.00 and 07.00 the following day AND for any hiring on a Sunday. Also a hiring between 07.00 and 19.00 on Christmas Eve and New Years Eve.
Tariff Three (T3)	£5.00 for the first 176 yards (or part thereof) and £0.45 for each subsequent 176 yards (or part thereof).	Applies to any hiring begun on Christmas Eve & New Year's Eve from 19.00 until 00.00 AND New Year's Day; Good Friday; Easter Sunday; Easter Monday; Mayday; Spring & August Bank Holidays; Christmas Day, Boxing Day.
Tariff Four (T4)	To be Removed	To be Removed

Additional Charges – Applies to all tariffs

Type	Tariff	Details
Waiting Time	T1: 30p per minute T2: 40p per minute T3: 50p per minute T4: 60p per minute	This additional charge is applied automatically by the meter.
Dogs (excluding assistance dogs)	£1.00	These additional charges are applied by the driver and shown as EXTRAS on the meter
Each extra person	£0.50	
Large Items of Luggage (not shopping bags)	£0.50	Per Item
Fouling inside or outside cab	£100.00	This charge is not shown on the meter and is in addition to the fare shown.

Any person wishing to object to the increase in fares as set out in the Schedule above, or to make any representations in relation thereto, may do so in writing to me at the address given below, stating the objections or representations. Objections or representations must be received within 14 days of the date of publication of this notice. Objections or representations may also be sent by e-mail to nigel.marston@exeter.gov.uk

Nigel J Marston, Principal Licensing Officer

Exeter City Council, Civic Centre, Paris Street, Exeter, EX1 1RQ

Equality Impact Assessment: Proposed Hackney Carriage (Taxi) Fare Tariff Changes

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.

1. Key recommendations:

The report outlines a proposal to consider changes to the current taxi tariff table.

Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 permits Licensing Authorities to set the fares tariff for Hackney carriages (taxis) licensed in the district. The tariff sets the maximum fares that taxis can charge the public when using their vehicles. Exeter City Council, in common with most other Councils, have used this power for many years and the last tariff increase was agreed in November 2022.

All changes to the hackney carriage tariff table in use in Exeter must be approved by the Executive. The legislation requires that before any alteration to the tariff table can take effect a public notice explaining the changes must be placed in a local newspaper. The public then must be provided with a period of at least 14 days to make comment on the proposals. If no adverse comment/objection is received the approved changes must take effect. Alternatively if adverse comment/objection is received then the matter must be returned to allow the Executive to consider the representation(s).

Research conducted by the Licensing Authority confirms that Exeter currently has the fifth most expensive 2-mile fare level in Devon and is the 133rd most expensive fare in the UK over that distance. If the proposed increases are implemented then Exeter would have the most expensive 2-mile fare level in Devon, and would move to approximately 10th position in the national list.

It is recommended that the Executive give consideration to the draft tariff table to be consulted upon as attached and agree:

- (1) That the proposals are put out to public consultation to run from 5 October 2022 until 2 November 2022 (4 weeks);
- (2) That a public notice containing the proposed variation table is published in one local newspaper during the above period; and
- (3) The matter is brought back to Executive on 29 November 2022 for determination.

2. Committee name and date: Executive 20 May 2025

3. Stakeholders: Residents, Elected Members, Visitors to the City and Hackney Carriage Trade

4. Main beneficiaries are: The Hackney carriage trade. Residents, Elected Members and Visitors to the City through a properly funded Hackney carriage trade providing a high quality service.

5. Consultation: Minimum 14 day consultation following newspaper advert required by Section 65 of the Local Government (Miscellaneous Provisions) Act 1976, but in this instance we have proposed a 29 day consultation.

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

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

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

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

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	There is no evidence to suggest that the proposed policy amendment would have a potential impact on this characteristic.		
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.	Negative	Medium	<p>POSITIVE A properly resourced taxi trade with an appropriate tariff table would mean that the taxi trade remains economically stable, thereby attracting new drivers into the trade to continue and improve this vital public transport.</p> <p>NEGATIVE Wheelchair users and disabled persons are statistically more likely to use taxis than persons who do not identify themselves as disabled. As such a rise in the tariff table would impact this group more economically. Significant price rises may lead to taxis becoming less affordable and as such increase the risk of social exclusion amongst those who rely on taxis for their transport needs.</p> <p>Some potential mitigation may be provided by including relevant local disability groups in the consultation process. Should adverse consultation responses be received then the matter would be referred back to the Licensing Committee for further consideration.</p>

Sex/Gender	There is no evidence to suggest that the proposed policy amendment would have a potential impact on this characteristic.		
Gender reassignment	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	There is no evidence to suggest that the action plan would have a potential impact on this characteristic.		

<p>Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).</p>	Negative	Medium	<p>POSITIVE A properly resourced taxi trade with an appropriate tariff table would mean that the taxi trade remains economically stable, thereby attracting new drivers into the trade to continue and improve this vital public transport.</p> <p>NEGATIVE Surveys by the DFT have identified that young adults and elderly persons are more likely than other age groups to use taxis on a regular basis. As such a rise in the tariff table would impact these age groups more economically, particularly the elderly who are more likely to have a fixed income. Significant price rises may lead to taxis becoming less affordable and as such increase the risk of social exclusion amongst those who rely on taxis for their transport needs.</p> <p>Some potential mitigation may be provided by including relevant local age awareness groups in the consultation process. Should adverse consultation responses be received then the matter would be referred back to the Licensing Committee for further consideration.</p>
<p><u>Actions identified that will mitigate any negative impacts and/or promote inclusion</u></p> <ul style="list-style-type: none"> • Promotion of the consultation to local age and disability awareness groups to ensure that their views are taken into consideration, with any negative comments triggering a referral back to the Licensing Committee for further consideration. 			

Officer: Simon Lane
Date: 17.04.2025

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REPORT TO EXECUTIVE

Date of Meeting: 20 May 2025

REPORT TO COUNCIL

Date of Meeting: 10 June 2025

Report of: Strategic Director People and Communities

Title: Review of Equality, Diversity and Inclusion Policy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To seek approval for the adoption of the revised Equality, Diversity and Inclusion Policy.

2. Recommendations:

2.1 That Executive recommends that Council approves the adoption of the revised Equality, Diversity and Inclusion Policy.

3. Reasons for the recommendation:

3.1 The Equality, Diversity and Inclusion Policy has been reviewed and updated to ensure it reflects current good practice.

4. What are the resource implications including non financial resources

4.1 The report is an update on the policy. The policy will require a heightened awareness from staff in their day-to-day work to take account of equality considerations which may require additional time. There will also be a requirement for training and awareness raising programmes to ensure all staff understand their responsibilities.

5. Section 151 Officer comments:

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

6. What are the legal aspects?

6.1 Section 149 of the Equality Act 2010 imposes the public sector equality duty. This is a legally binding duty which requires public authorities in the exercise of their functions to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7. Monitoring Officer's comments:

7.1 The proposed policy is designed to ensure that the Council complies with its public sector equality duty. The Monitoring Officer has no additional comments.

8. Report details:

8.1 This policy was last reviewed in 2023. The current review has been undertaken to ensure the policy reflects the organisation restructure and learning from the LGA review which took place in June 2024. In particular:

- The peer reviewers felt that the policy was too long and needed to be streamlined so some sections have been removed where they repeated text within other policies.
- The section which highlighted the [Devon Joint Declaration for Equality](#) has been removed. The council signed up to this in 2012 however the number of protected characteristics that the declaration covers is wider than our policy which only covers the nine under the Equality Act 2010. The organisation remains signed up to the declaration for the time being but although this appears on Devon County Council's website it is not clear how much public knowledge there is of it.

8.2 In June 2024 the Chief Executive invited the Local Government Association (LGA) to undertake a review of the City Council's work on Equality, Diversity and Inclusion and invited recommendations on how to make improvements.

8.3 In response to the review a task force has been set up chaired by the Strategic Director People and Communities, to take the recommendations forward. A number of actions have already been completed including:

- Publication of a set of equality objectives for 2025/26 to comply with the specific duties of the Equality Act 2010.
- Development of an EDI Training Framework which sets out a suite of modules tailored to particular staff groups and supported by a resource hub which staff can access outside of formal training.
- A series of All Staff Briefings in February 2025 led by the Senior Management Board which highlighted the findings of the review and the actions taking place to make improvements. The EDI review findings and high-level action plan were shared in our weekly staff newsletter to aid staff in understanding the organisation's commitment to equality, diversity and inclusion and the part they can play in driving improvement.
- Staff have been encouraged to ensure the personal data that they provide to Human Resources is up to date so that we can check whether the organisation reflects the community it serves.
- We have updated the Terms of Reference for our Equality, Diversity and Inclusion Champions group to clarify their role and responsibilities and make sure that we reflect the best value that the group can contribute.

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

9.1 In promoting equality and diversity the policy contributes directly to two priorities of the Corporate Plan:

- Healthy and active city;
- Housing and building great neighbourhoods and communities;
- Leading a well-run council.

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

10.1 Failure to meet duties under the Equality Act 2010 risk challenge from the public and community groups.

10.2 The Strategic Management Board provides governance to the policy and resulting actions.

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 No direct carbon/environmental impacts arising from the recommendations.

13. Are there any other options?

13.1 No.

Strategic Director People and Communities, Jo Yelland

Author: Melinda Pogue-Jackson, Policy Officer

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

Background papers used in compiling this report:-

None

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



Equality, Diversity and Inclusion Policy

Policy Development and Version details

Author	Melinda Pogue-Jackson
Owner / Department	Human Resources
Date created	January 2025
Review Period	3 Years
Status for FOI	Open
EqlA conducted	Yes
This Policy Document can be made available in large print and other formats such as printed on yellow paper, taped, Braille etc. as requested.	

Version	Date	Description	Initials
5	January 2025	Amendments to reflect restructure	MPJ
4	August 2023		
2	July 2018		
1	August 2016		

1. Introduction

- 1.1 Exeter City Council works with the fundamental principles of the Universal Declaration of Human Rights 1948 ¹ and welcomes the diversity of the community living, working, visiting and learning in the city. As a service provider, community leader and employer the council is committed to being an exemplar in promoting equality and tackling social exclusion.
- 1.2 This document sets out our aims for the Council and what we need to do to achieve those aims. It provides an overarching direction for our work and other policies and activities will be developed and reviewed to ensure that we can achieve our aims.

2. How will we achieve this?

2.1 As a provider of services

- 2.2 We will continue listen to what our customers tell us about how to make our services easier to use and more accessible for everyone in Exeter. This will include:

- enabling the communities we serve to engage with us to increase our understanding of their needs
- making it easier for customers to find information about and access our services through our Digital Customer Service Strategy and Translation and Interpretation Policy
- looking at ways to make our buildings and public meetings more accessible to customers

2.3 As an employer

- 2.4 We believe that having a workforce that reflects the diversity of the local population; feels it is treated equally and fairly; and has the opportunity to grow and develop at work will help us to provide a quality service to the people of Exeter. Our aim is to be an equal opportunities employer. To do this we need to:

- analyse workforce data and look at ways in which the diversity of the workforce can be improved to reflect the diversity of the communities we serve.
- ensure all staff are paid equally for work of equal value
- ensure that staff are treated fairly and have equal opportunities at work regardless of their background or status
- ensure that all staff can work in an environment and culture free from harassment, bullying and discrimination
- ensure that all staff have the skills and understanding they need to meet the diverse needs of a diverse population
- listen to what staff tell us about their needs and adapt buildings and systems to ensure they are able to fulfil their potential
- provide appropriate training to staff to help them to understand their rights and responsibilities and to increase awareness of the council's legal duties, obligations, practices and procedures.

2.5 When helping to build successful communities:

¹ <http://www.un.org/en/universal-declaration-human-rights/>

2.6 The council has an important role to play in helping to build and support successful cohesive communities that have an active role in shaping services and local neighbourhoods. To do this we will continue to:

- ensure policies developed by the council promote community cohesion and resilience.
- increase the engagement of people from diverse communities with the council's decision-making process
- continue to support and invest in asset-based community development

3. Scope of the policy

3.1 This policy is intended to reflect the Equality Act 2010 including the public sector equality duty which states that:

A public authority must, in the exercise of its functions, have due regard to the need to -

(a) **eliminate discrimination, harassment, victimisation and any other conduct that is prohibited** by or under this Act;

(b) **advance equality of opportunity** between persons who share a relevant protected characteristic and persons who do not share it;

(c) **foster good relations** between persons who share a relevant protected characteristic and persons who do not share it.

3.2 Due regard to the duty should occur when making decisions and in other day to day activities. The duty must be exercised in substance, with rigour, and with an open mind, and in such a way that it influences the final decision.

3.3 The duty applies to nine 'protected characteristics' as set out in the Equality Act 2010: age, disability, sex, gender reassignment, marriage and civil partnership (in relation to point a. at work), pregnancy and maternity, race, religion and belief, sexual orientation.

3.4 Everyone who uses services, facilities and information provided by the council should be treated in line with this policy. This includes customers, members of the public, partners, contractors, employees, volunteers, people on work placements and elected members.

3.5 The Equality Act 2010 is built on the principles of the Human Rights Act. The council supports the purpose and articles of the Act and specifically Article 14 which provides that 'the rights and freedoms set forth in (the Human Rights Act) shall be secured without discrimination on any ground'.

3.6 The Council supports the International Holocaust Remembrance Alliance working definition of Antisemitism: "Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities." ([What is antisemitism? | IHRA \(holocaustremembrance.com\)](https://www.holocaustremembrance.com/what-is-antisemitism))

3.7 Following the death of George Floyd and the Black Lives Matter protests in 2020, and in response to a recommendation from the Council's review of the General Buller Statue, the Senior Management Board and Executive Members developed an Anti-Racism Statement (see Appendix A).

4. Our supporting policies, structures and processes

4.1 The council has several supporting policies, structures and processes in place, in addition to this policy. These include:

- An Equality Impact Assessment toolkit to help anticipate the consequences of work on customers and staff. In doing this we can make sure that, as far as possible, any negative consequences are eliminated, minimised or counterbalanced by other measures, and opportunities for promoting equality are maximised. This also improves efficiency because we can identify where to target our resources most effectively.
- Employment policies covering recruitment and selection, flexible working and procedures for dealing with discrimination, bullying, harassment and victimisation.
- Codes of conduct covering employee, member and customer behaviour
- Communication standards including policies and guidance for translations, interpreting and alternative formats, and use of social media.
- Evaluations against current accessibility regulations and recommendations for upgrading and improvement where relevant
- Procurement/commissioning standards and clauses
- An elected member and officers who have designated responsibility for leading on equality, diversity and inclusion, raising awareness and building capacity within the organisation.
- A Consultation Charter and development of a Consultation and Engagement Strategy to guide our engagement work
- Partnership meetings such as the Community Safety Partnership which provide governance to how we work with other agencies on issues we cannot tackle in isolation.
- Minimum standards for gathering data related to services and employment which includes protected characteristics under the Equality Act 2010 to allow us to better understand the needs of customers and staff and tailor our services accordingly.
- An action plan with specific, measurable, achievable, resourced and timebound objectives to address gaps in work and drive continuous improvement.
- External benchmarks to measure ourselves against such as the Equality Framework for Local Government.

5. Responsibilities

5.1 Ultimate responsibility

The ultimate responsibility for the provision of equality, diversity and inclusion lies with the council. The Public Sector Equality Duty cannot be delegated. This means that the duty will always remain the responsibility of Exeter City Council. In practice, this may mean that the council will need to ask suppliers to take certain steps (such as monitoring service users), in order to enable the public authority to meet their continuing legal obligation to comply with the Public Sector Equality Duty.

5.2 Individual responsibility

5.3 Members

Each Exeter City Councillor has the personal responsibility to comply with the policy.

5.4 Officers

5.5 Strategic Management Board

The Chief Executive has been delegated overall responsibility for ensuring that this policy and the processes underpinning it are developed, implemented effectively, monitored and updated.

The Strategic Management Board is required to ensure good governance of the organisation and has overall responsibility to make sure this policy is consistently applied and taken into account when setting strategic direction and reviewing performance.

The Strategic Director People and Communities has the strategic lead for equality, diversity and inclusion and the implementation of this policy.

Individual strategic directors are responsible for checking that reports to committee include Equality Impact Assessments where necessary.

5.6 Heads of Service are required to:

- manage equality, diversity and inclusion within their services
- ensure that equality, diversity and inclusion is clearly incorporated into policy, design and delivery of services and functions, where relevant and that Equality Impact Assessments are carried out proportionately prior to making decisions
- ensure that all employees within their services are aware of the policy and have received training in the implementation of the policy
- ensure that all employees within their services who are involved in recruitment and selection have received training on equal opportunities

5.7 Employees, including volunteers and people on work placements, in general are required to:

- ensure they understand and comply with the letter and spirit of the policy
- actively participate in measures introduced by the council to promote equality, diversity and inclusion and ensure that there is no discrimination
- report to management any discriminatory practices or behaviours
- support the proper investigation of complaints.

Employees and others working on behalf of an employer can be held personally liable for acts of unlawful discrimination where an employer has taken all reasonable steps to prevent such an act.

5.8 Human Resources are required to:

- ensure that the council's recruitment, training and development and other working practices and procedures are non-discriminatory and promote equality of opportunity
- carry out corporate monitoring of employment policies and practices and publish results annually
- ensure that managers and members are aware of the content of the policy relating to employment matters and the legislative framework underpinning it

5.9 Trade Unions are encouraged to:

- work with management in monitoring equality, diversity and inclusion
- ensure that their elected officials are conversant with the council's policy and its application

5.10 Contractors, suppliers and consultants

A requirement to comply with equality legislation will be included in all contracts, service level/delivery agreements and licences. Failure to comply may lead to the termination of contracts. Organisations doing business with us are welcome to adopt our equality, diversity and inclusion policy for their own use.

6. Learning and development

- 6.1 Exeter City Council will treat its employees fairly and offer them the appropriate training and development, to not only help them do their current jobs but also help them develop further within their area of work.
- 6.2 Positive action may be taken in providing training and development to minority groups to ensure that members of the group have equal access to training and development and promotion opportunities.
- 6.3 All employees will be provided with access to training and development and reasonable adjustments to support access will be made where needed.

7. Access Statement

- 7.1 The Council undertakes to make reasonable adjustments/provisions to enable employees and their representatives with protected characteristics to effectively access and engage with this policy/procedure. This may include actions such as the provision of communication in a different format (e.g. brail, foreign or sign language interpreter) and ensuring accessibility of office locations and meeting rooms, and/or provision of equipment.
- 7.2 However, in order to fulfil this function, the employee must make their manager aware of their or their representative's access needs.

Anti-Racism Statement

Exeter City Council has a zero-tolerance approach to all forms of discrimination. As part of this all-embracing commitment to promoting equality, diversity and inclusion for all, we pledge to become an anti-racist council and to uphold this stance in everything that we do.

What does this mean?

Being an anti-racist organisation is more than being just 'non-racist', it means taking action and actively identifying and opposing racism. We will actively identify, discuss and challenge racism and the impact it has on our organisation, our people, our systems and the residents we serve. We cannot do this on our own so we will work in collaboration with committed and supportive organisations and individuals across the city, to amplify our collective efforts to drive out racism. We will take a leadership role in the city in tackling racism in all its forms.

We are committed to long-term action and visible change, and we will:

1. Provide **clarity** on our organisations stance and values, we will have zero tolerance to racism and demonstrate this publicly in our external messages.
2. Develop a **systemic approach** which enables practical action. Lasting change needs a view across the whole organisation to identify and tackle the causes of race inequalities and discrimination at work.
3. Continue to **provide visible leadership** on racial inclusion and demonstrate a willingness to change and commit to sustained action.
4. Through our One Exeter change programme, we will **embed anti- racism** into our people management approach at every opportunity. Attracting and retaining a wider, more diverse talent pool is crucial to developing a workforce which reflects our community. Everyone who joins our organisation must feel welcome, supported and treated fairly and our policies should encourage respectful and positive attitudes to differences.
5. Provide **safe channels** for people to express their voices and share experiences. Learn from this valuable resource and use the information to actively shape our organisation for staff and those who use our services.
6. Ensure **consistent two-way communication**. Senior leaders and people managers need to engage in ongoing, responsive, two-way dialogue with staff to ensure that they feel listened to and valued.

We recognise that we are on a journey of understanding and learning and do not have all the answers just now, but this is not just a statement of intent, it is a declaration of our single-minded approach to proudly oppose racism in all its forms.

Exeter City Council Executive Members and Strategic Management Board

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Equality Impact Assessment: *Equality, Diversity and Inclusion Policy review February 2025*

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:
SMB 15 April	Equality, Diversity and Inclusion Policy review February 2025	Adoption and implementation of the revised policy	All protected characteristics are impacted.

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	High	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>Current iTrent HR data shows that of those staff who have provided information 25% are from a Black, Asian or minority ethnic background. The 2021 census, 9.7% of Exeter residents are from Black, Asian and minority ethnic communities. The council is in the process of developing minimum standards for collecting data on our customers and staff to understand how many people within protected characteristics would be impacted by our policies and functions.</p>
	Positive	High	<p>Following the death of George Floyd and the Black Lives Matter protests in 2020, and in response to a recommendation from the Council's review of the General Buller Statue, the Senior Management Board and Executive Members have developed an Anti-Racism Statement which is included in the policy at (see Appendix A). This sets out specific commitments in relation to this protected characteristic.</p>

	Negative	Low	There is no hierarchy of rights in the Equality Act 2010 or this policy, however occasionally actions to support one protected characteristic may inadvertently discriminate against people sharing another protected characteristic. Where this occurs each case will be looked at with reference to case law and best practice to ensure that the action is proportionate and necessary to achieve a legitimate aim e.g. protection against discrimination.
	Negative	Low	Staff for whom English is an additional language may need additional support to access the policy and be made aware of the protections it affords. The Translation and Interpretation Policy and guidance will address this.
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. This can include mental health issues, learning disabilities, sensory impairments and neurodiversity.	Positive	High	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>The council is in the process of developing minimum standards for collecting data on our customers and staff to understand how many people within protected characteristics would be impacted by our policies and functions. Current ITrent HR data shows only 3.8% of staff declared a disability. This is likely to be an element of under reporting within this figure as 2021 census shows 18.2% of people in Exeter declared a disability.</p>
	Negative	Low	There is no hierarchy of rights in the Equality Act 2010 or this policy, however occasionally actions to support one protected characteristic may inadvertently discriminate against people sharing another protected characteristic. Where this occurs each case will be looked at with reference to case law and best practice to ensure that the action is proportionate and necessary to achieve a legitimate aim e.g. protection against discrimination.

	Negative	Low	<p>However the Equality Act gives employers and organisations a responsibility to make 'reasonable adjustments' for people with disabilities.</p> <p>People on long term sick leave may be unaware of the policy. Line Managers have the responsibility to ensure all returning employees from long term leave are properly informed about the council's policy changes and updates upon their return to work. This is outlined in the Sickness Management policy.</p>
	Negative	Low	<p>Some staff may need additional support to access the policy due to a disability such as sensory impairment or dyslexia. The Translation and Interpretation Policy and guidance will address this.</p>
Sex/Gender	Positive	High	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>Current iTrent HR Metrics show that the sex of staff is evenly split 50:50 male and female though this changes when looking at service level. It should be noted that ITrent does not allow for non-binary answers.</p> <p>The 2021 census shows Exeter residents are 51% female and 49% male.</p>
Gender reassignment	Positive	High	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>In the 2021 census 0.6% of people identified as having a different gender to the sex on their birth certificate, trans or non-binary.</p>
	Negative	Low	<p>Anyone under treatment which keeps them away from work for a long period may be unaware of the policy. Line Managers have the responsibility to ensure all returning employees from long term leave are</p>

			properly informed about the council's policy changes and updates upon their return to work. This is outlined in the Sickness Management policy.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Positive	High	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>The 2021 census shows the following information on how Exeter residents identify their religious beliefs:</p> <ul style="list-style-type: none"> • 48.5% No religion • 40% Christian • 0.5% Buddhist • 0.5% Hindu • 0.2% Jewish • 2.2% Muslim • 0.1% Sikh • 0.7% other religion • 7.4% not answered
	Positive	High	The policy also includes a statement setting out the Council's support for the International Holocaust Remembrance Alliance working definition of Antisemitism which will have positive impact on Jewish customers and staff.
	Negative	Low	The policy does not include any other such statements for other religions or ethnicities however this does not preclude them from being added in the future as the policy can be reviewed and updated at any time.

Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Positive	High	<p>The policy sets out the Council’s commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>In the 2021 census 86.2% of Exeter residents identified as straight/heterosexual and 5.3% as LGBTQ+. 8.5% did not answer.</p>																																													
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive	High	<p>The policy sets out the Council’s commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>2021 census data for Exeter residents:</p> <table><tr><th>geography</th><th colspan="2">Exeter</th></tr><tr><th>measures</th><th>value</th><th>percent</th></tr><tr><td>Age</td><td></td><td></td></tr><tr><td>Total</td><td>130,709</td><td>100.0</td></tr><tr><td>Aged 4 years and under</td><td>5,884</td><td>4.5</td></tr><tr><td>Aged 5 to 9 years</td><td>6,201</td><td>4.7</td></tr><tr><td>Aged 10 to 15 years</td><td>7,293</td><td>5.6</td></tr><tr><td>Aged 16 to 19 years</td><td>10,591</td><td>8.1</td></tr><tr><td>Aged 20 to 24 years</td><td>16,349</td><td>12.5</td></tr><tr><td>Aged 25 to 34 years</td><td>17,990</td><td>13.8</td></tr><tr><td>Aged 35 to 49 years</td><td>23,168</td><td>17.7</td></tr><tr><td>Aged 50 to 64 years</td><td>21,507</td><td>16.5</td></tr><tr><td>Aged 65 to 74 years</td><td>11,178</td><td>8.6</td></tr><tr><td>Aged 75 to 84 years</td><td>7,329</td><td>5.6</td></tr><tr><td>Aged 85 years and over</td><td>3,219</td><td>2.5</td></tr></table>	geography	Exeter		measures	value	percent	Age			Total	130,709	100.0	Aged 4 years and under	5,884	4.5	Aged 5 to 9 years	6,201	4.7	Aged 10 to 15 years	7,293	5.6	Aged 16 to 19 years	10,591	8.1	Aged 20 to 24 years	16,349	12.5	Aged 25 to 34 years	17,990	13.8	Aged 35 to 49 years	23,168	17.7	Aged 50 to 64 years	21,507	16.5	Aged 65 to 74 years	11,178	8.6	Aged 75 to 84 years	7,329	5.6	Aged 85 years and over	3,219	2.5
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51-60	284																		
>60	155																		
Pregnancy and maternity including new and breast feeding mothers	Positive Negative	High Low	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p> <p>Anyone who is away from work for a long period may be unaware of the policy. Line Managers have the responsibility to ensure all returning employees from long term leave are properly informed about the council's policy changes and updates upon their return to work. This is outlined in the Pregnancy and Maternity Leave Policy.</p>																
Marriage and civil partnership status	Positive	High	<p>The policy sets out the Council's commitment in promoting equality and tackling social exclusion as a service provider, community leader and employer.</p>																
<p><u>Actions identified that will mitigate any negative impacts and/or promote inclusion</u></p> <ul style="list-style-type: none">• Ensure the policy can be made available in additional languages and formats and that managers ensure anyone with additional language needs is made aware of the policy and the protections it affords.																			

Officer: Melinda Pogue-Jackson
Date: 17 February 2025

REPORT TO EXECUTIVE

Date of Meeting: 20 May 2025

REPORT TO COUNCIL

Date of Meeting: 10 June 2025

Report of: Strategic Director of Corporate Resources & s151 Officer and the Head of Commercial Assets

Title: Disposal report seeking authority to dispose of the former Clifton Hill Leisure Centre.

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive and Council

1. What is the report about?

1.1 Following tenders in October 2024 and best and final tenders in November 2024 officers are asking Executive to approve the disposal of the Former Clifton Hill Leisure Centre site (see Appendix 1) to the highest bidder for the delivery of a 100% Affordable Rent Extra Care housing scheme for older people.

2. Recommendations:

That Executive resolves to approve the following:

2.1 The sale of the Former Clifton Hill Leisure Centre site to Preferred Homes Limited for £3.375 million (Three Million, Three Hundred and Seventy-Five Thousand Pounds Sterling) at a undervalue of £425,000 conditional upon planning approval being granted for the delivery of 100% Affordable Rent Extra Care housing scheme for older people; and

2.2 That delegated authority is granted to the Head of Commercial Assets, in consultation with the Strategic Director of Corporate Resources (s.151 officer) and the Leader, to approve the final terms of the sale.

That Executive recommends to Full Council:

2.3 The approval of a budget for £50,000, funded by anticipated capital receipts to cover disposal costs (including external agency and legal fees) associated with this sale.

3. Reasons for the recommendation:

3.1 Whilst minimising financial risk to the Council and complying with members' previous instructions the recommendation will also delivering extra care affordable housing greatly needed in Exeter as captured in Appendices 2, 3 & 4 and the policy documents below:

- o Devon County Council's ("DCC") latest Adult Social Care Strategy which can be found here ([Our vision - Promoting independence](#)) and confirms DCC's intention to grow Extra Care Living,
- o the latest Exeter Local Housing Needs Assessment ([Exeter Local Housing Needs Assessment](#)).
- o DCC's recent February 2025 Market Position Statement (with 151 extra care units of current unmet commissioned need in Exeter) - [Market Position Statement: February 2025 - Provider Engagement Network](#); and
- o The Devon Housing Commission Report which specifically identifies the need for Extra Care housing in Devon (due to its rapidly ageing population driven by the internal migration of older people) - [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#)

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

4.1 This development land disposal will generate capital receipts for the Council that could be used to reduce the Council's Capital Financing Requirement.

4.2 The sale will require support services from officers in Commercial Assets, Legal and Finance teams.

5. Section 151 Officer comments:

5.1 If approved, the funds from the capital receipt will have to be used to write down the debt associated with the asset. They are not quite enough, but there is sufficient available in the sale of Mary Arches capital receipt to offset the amount required.

6. What are the legal aspects?

6.1 Local authorities are under a duty to comply with Section 123(2) of the Local Government Act 1972, which requires that except with the consent of the Secretary of State ("SoS") a Council they shall not dispose of land under this section for a consideration less than the best that can reasonably be obtained.

6.2 If the Council chooses to place restrictions on the disposals and these restrictions cause an undervalue of more than £2 million, then SoS consent must first be obtained. Where the under value is less than £2 million, then disposal may take place in accordance with the general disposal consent order (the Local Government Act 1972 General Disposal Consent 2003) subject to paragraph 6.3 below.

6.3 The proposed sale of the land at Clifton Hill, does not involve an undervalue of more than £2 million. Accordingly, the consent of the SoS for the sale is not required.

6.4 Where there is a sale of land by a local authority at an undervalue, the authority must comply with the requirements of the Subsidy Control Act 2022.

7. Monitoring Officer's comments:

7.1 Members' attention is drawn to the legal aspects that apply and must be observed as set out in paragraph 6 above.

8. Report details:

Background

8.1 Clifton Hill is a two-acre site to the northeast of the City Centre in the Newtown and St Leonards ward. The site was formerly a sports centre (see Appendix 1).

8.2 Following approval to scale down Exeter City Living Limited (“ECL”) in October 2023 the Council approved the disposal of the existing Clifton Hill site on the open market (save for Purpose Built Student Accommodation) in December 2023.

8.3 The site was transferred back to Exeter City Council (“ECC”) from ECL at the end of March 2024. In May 2024 the Strategic Management Board (“SMB”) decided on an informal tender disposal of the site for maximum consideration (save a restriction on Purpose Built Student Accommodation as instructed by Full Council). Requests for Quotations were issued June 2024 and JLL were appointed as agents in July 2024.

8.4 The site went to market in August 2024 and tenders for the purchase of the site were received in October 2024. Best and final bids and interviews with bidders were undertaken in November 2024.

Prevailing Situation

8.5 None of the bidders put forward an offer based on taking forward the existing 41-unit planning consent (ref: 22/0365/VOC).

8.6 The highest bidder, Preferred Homes Ltd, is offering to construct a 100% affordable housing extra care scheme.

The Preferred Bidder

8.7 Preferred Homes Ltd is a developer and registered provider who can demonstrate availability of funding and a clear track record of delivery. The initial concept schemes are not considered high risk from a planning perspective. The bid of £3.375m is subject to satisfactory site investigations, surveys and pre-applications prior to exchange.

8.8 The proposed scheme use is extra care (Use Class C2) which the bidder describes as:

“Preferred Homes’ affordable Extra Care delivery model requires Homes England Affordable Homes Programme grant funding which supports the delivery of affordable rented social housing. Rent will be no more than 80% of the open market rent and service charge for a similar open market product.

Residents typically are an average age of 75 years. Whether single or part of a couple, residents can occupy a one-bedroom apartment and consequently, Preferred Homes’ schemes are predominantly one-bedroom apartments with only a few of two-bedroom design. Extra Care residents live independently and fully engage with their surrounding communities. Also, the local communities will fully engage with the development as facilities are provided on site including for example, a café and multi-purpose rooms which can provide activities such as Pilates and yoga, and weekly doctors surgeries. The particular demographic of the residents, coupled with the more limited number of care staff likely to be on site at any one time, ensures car parking and cycling provision needs are much lower than might otherwise be the case.

Of particular importance in terms of building design and shape, is that corridor length is kept to a minimum moving away from an institutional feel by providing reduced and safe walking distances to lifts and central communal facilities. The corridor length is one of the

principal reasons why Preferred Homes developments are designed over four floors rather than three. Air Source Heat Pumps are installed in conjunction with photovoltaics on the roofs of the buildings to reduce energy usage. The combination of the two sustainable technologies means that electricity bills for residents will be significantly reduced and reflects the fact that affordability is at the heart of each development.

Link to Drone Video of recently completed Leeds Extra Care Housing development - <https://f.io/A11wsbQy> ”

8.9 The affordable housing scheme (100% affordable rent which is set at 80% of open market rent), proposes 72 homes and those homes will be made available (via s.106 obligations) to older Exeter residents on the housing register for the first 25 years of the scheme.

Proposed Route Forward

8.10 In December 2023 members decided to restrict the disposal to preclude Purpose Built Student Accommodation (“PBSA”) and at the time the commercial implications of this restriction were estimated in the region of £920k (based on a PBSA residual land value of £3.96m and a residential residual land value of £3.04m). Based on Savills recent formal valuation (March 2025 - available to members by request) the financial impact of the PBSA restriction is actually in the region of £425,000 (based on a PBSA residual land valuation of £3.8m less £3.375m offer from Preferred Homes – see Appendix 3) which is less than half the previously estimated undervalue/ commercial implication.

8.11 A Subsidy Control Report is appended at Appendix 3 which addresses the undervalue in accordance with the Subsidy Control Act 2022.

8.12 The affordable housing scheme may help release larger homes as residents down-size to the scheme and both will create wellbeing benefits and wider healthcare savings whilst the ability to link the occupancy of the Preferred Homes scheme to local need (via the s.106 agreement) may free up homes for families and others on social housing waiting lists, reducing temporary accommodation costs generating long term revenue savings.

8.13 A Social and Economic Impact report provided by Preferred Homes is attached at Appendix 2.

8.14 The officer recommendation is to proceed with the highest bidder Preferred Homes Limited.

Reason for recommendation

8.15 The proposal complies with members’ previous instructions (to disposal of the site for maximum capital receipt subject to a restriction against PBSA) and has secured a bidder who will pay market value (subject to the PBSA restriction) whilst also delivering extra care affordable housing greatly needed in Exeter as captured in the policy documents below and Appendices 2, 3 & 4:

- o Devon County Council's ("DCC") latest Adult Social Care Strategy which can be found here ([Our vision - Promoting independence](#)) and confirms DCC's intention to grow Extra Care Living,
- o the latest Exeter Local Housing Needs Assessment ([Exeter Local Housing Needs Assessment](#)).
- o DCC's recent February 2025 Market Position Statement (with 151 extra care units of current unmet commissioned need in Exeter) - [Market Position Statement: February 2025 - Provider Engagement Network](#); and
- o The Devon Housing Commission Report which specifically identifies the need for Extra Care housing in Devon (due to its rapidly ageing population driven by the internal migration of older people) - [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#)

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

9.1 This decision will contribute to the Council's strategic priorities of 'Leading a Well-Run Council'. By facilitating the development on the Clifton Hill site, the Council will be advancing the corporate priorities of a prosperous local economy and delivering housing and building great neighbourhoods and communities.

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

10.1 An authority cannot dispose of land at less than best consideration unless a decision is taken on the undervalue (having consideration to wider social/ economic/ environmental benefits). To mitigate the risk this report has been prepared for consideration by members.

10.2 The purchaser might sell the site onwards for a profit. This is addressed by the sale being subject to planning for the purposes of an affordable rent extra care scheme and a covenant preventing the use of the site for PBSA.

10.3 The purchaser might not get planning permission for the proposed development and therefore not complete. A formal pre-application has been undertaken and initial discussions with the Local Planning Authority have been positive. Given the scale and affordable nature of the scheme the planning risk is considered to be minimal.

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 impact 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 relation to this report, no potential impact has been identified on people with protected characteristics as determined by the Act because the proposals do not seek to reduce or change services to the extent that they will impact on any individuals including those with protected characteristics. The former Clifton Hill Leisure Centre is a cleared vacant operational asset and there are no existing residents or tenants.

12. Carbon Footprint (Environmental) Implications:

12.1 In July 2019 the Council declared a Climate Emergency. Disposing of brownfield land for redevelopment should reduce pressure on Greenfield sites which should help the delivering our carbon reduction target (carbon neutral by 2030).

13. Are there any other options?

13.1 The proposal should lead to the positive regeneration of this derelict brownfield site. A “Do Nothing” option is not a recommended route.

**Strategic Director of Corporate Resources & s151 Officer, David Hodgson and
Head of Commercial Assets, Ben Colman**

Author: David Martin, Principal Development Surveyor

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

Appendices:-

- 1) Clifton Hill Red Line Plan
- 2) Preferred Homes – Public Purse & Societal Savings: Social & Economic Impact of Extra Car Housing
- 3) Draft Subsidy Control Report
- 4) Devon County Council Support Letter

Background papers used in compiling this report:-

- 1) Homes England – Measuring Social Value Paper 4: Measuring the Wellbeing and Fiscal Impacts of Housing for Older People - July 2024
- 2) Devon County Council – Promoting Independence – May 2023 (Update February 25)
- 3) Exeter City Council - Exeter Local Housing Needs Assessment: Report of Findings December 2024
- 4) Devon County Council - Market Position Statement: February 2025
- 5) University of Exeter - The Report of the Devon Housing Commission - 2024

Contact for enquires:

Democratic Services (Committees)
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PUBLIC PURSE & SOCIETAL SAVINGS: **SOCIAL & ECONOMIC IMPACT OF EXTRA CARE HOUSING**

The debate around the delivery of care services and suitable accommodation for elderly and vulnerable residents across England is extremely prescient. The current “Cost of Living Crisis”, Covid 19, the War in Ukraine and long term under investment in social housing and care services, combined with an ageing and longer living population, continue to put public and private stakeholders under considerable stress. We see media reports describing “unfit for purpose” housing, preventable early deaths, patients remaining in hospital beds when they could be at home and long ambulance queues waiting to deliver emergency patients to hospital for urgent care.

In addition to real financial savings and investment within the local and wider economy, the delivery of modern, bespoke Extra Care Housing (‘ECH’), aligned to properly assessed care packages, can generate significant benefits for residents, their families, the nursing and care professionals looking after them and help address these important issues of today.

FINANCIAL BENEFITS (SUMMARY)

For a typical 80 apartment ECH scheme:

- **Minimum public purse savings of £800,000 per annum,**
- **Total public purse savings of £20 million over a typical nominations period (25 years),**
- **£16 million investment into the local community via construction contract.**

If 5% of the total number of new retirement living properties required in England each year (see Mayhew Review) is delivered as Extra Care Housing, total savings will equate to:

- **Minimum public purse savings of £25 million per annum,**
- **Total public purse savings of £625 million over a typical nominations period (25 years),**
- **Investment via construction contracts of circa £500 million per annum (supporting local employment and associated revenues to UK Treasury).**

CONTEXT

The Mayhew Review: **“Future-Proofing Retirement Living. Easing the Care and Housing Crises”** was published in November 2022. The report states the number of over 65s is set to reach past 17 million by 2040. The Government should initiate an accelerated programme of constructing older people’s housing with up to 50,000 new homes per year on top of the currently 7,000 built annually. Achieving this growth would help older people stay healthy for longer and reduce the burden on the NHS and care homes. The report notes that each new home would free up housing and surplus bedrooms for younger families and first-time buyers, making housing more affordable. In addition, new developments could play a major part in revitalising declining high streets.

In October 2017, Housing LIN produced a report for Keepmoat Regeneration/Engie which states almost a third (29%) of all households aged over 55 are looking to downsize. This increases to nearly two thirds (63%) of those living in houses with more than two bedrooms. The most common reason for not going through with a move is a lack of suitable properties (25%).

Unquestionably, there is a link between the inadequate supply of housing and the increasing burden on public services.

There are a number of initiatives which can be implemented through better interaction between state, local and private stakeholders which combined will:

- increase the wellbeing of vulnerable adults and children,
- reduce the cost burden on the public purse,
- increase the number of available hospital beds,
- reduce ambulance waiting times,
- assist in “levelling-up” local and national economies.

The provision of ECH is a considerable and valuable part of the overall solution to the many problems society is facing due to its ageing population.

SOCIAL BENEFITS

Long term ‘wellbeing’ benefits to residents of ECH are well documented in terms of improving quality of physical and mental health at a time when residents might otherwise be vulnerable to feelings of loneliness, depression, anxiety and a loss of purpose.

The Extra Care Charitable Trust Research 2015-2018, published in March 2019, updates and continues previous work carried out for the period 2012 – 2015 and states:

- There are significant improvements in Extra Care (‘EC’) residents’ health and well-being,
- Residents enjoy more physical exercise and have improved memory and cognitive abilities (exercise by EC residents increased by 75%),
- In critical health factors that are expected to increase with age (e.g. functional ability, independence or worsening cognitive ability) residents within ECH showed no such declining trend was emerging (risk of falls reduced by 18% over the first 2 years of living within ECH; 23% reduction in anxiety levels; 24% improvement in memory),
- EC residents’ levels of depression are low, social well-being is high and they enjoy lower levels of loneliness than the national average (86.5% of EC residents are “never or hardly ever” lonely),
- EC residents have changed the way they use health care resources such that age related frailty status are delayed,
- EC residents’ unplanned hospital stays reduce from 8-14 to 1-2 days,
- EC residents reduce planned and routine GP visits by 46%.

These “**Social / Wellbeing**” benefits are a major catalyst to providing real financial gains to the public purse. There is little published data which attempts to fully and accurately calculate these financial benefits to society as whole – not least because the data is held within the treasuries of various Local Authorities, separate NHS Trusts and Central Government. A co-ordinated and centralised piece of research by Central Government would be welcome and encourage further investment in the sector.

However, there are a number of independent studies which attempt to evaluate the financial benefits of ECH.

FINANCIAL BENEFITS

Local Authorities have been commissioning housing with care (referred to as Extra Care Housing) since the early 2000s. This has been driven by a desire to extend the range of housing options available to older and disabled people and the need to have more cost-effective models of care. There is increasing interest amongst care commissioners in the long-term benefits of housing with care in terms of improved quality of life for residents and also the financial benefits to the health and social care systems.

ECH enables local authority residents with support needs to maintain independence and avoid longer term residential care. Cost savings are derived from the delivery of flexible care and care procurement efficiencies through providing centralised care at single ‘community’ sites rather than spread across multiple sites.

There are various publications, including collaborations with sector specialists, ***Housing Learning Information Network (HLIN)*** and others, highlighting positive impacts on the health care economy. This includes reductions in the number of GP and community health nurse visits, non-elective admissions to hospital, reductions in length of stay and delayed discharges from hospitals and reductions in ambulance call outs. It is now broadly accepted that many people with minor care needs are currently housed within Care Homes at far greater cost and with far worse outcomes than would be experienced if sufficient ECH accommodation could be provided. Direct savings to the public purse are found through:

- ***NHS Cost-Benefits & Savings:*** Fewer GP visits; fewer community nurse appointments; fewer ambulance call-outs; fewer and shorter unplanned hospital admissions,
- ***Savings Compared to Residential Care:*** Delayed moves to a residential or nursing care setting; lower overall health costs,
- ***Reduced Care Needs/Reduced Growth in Care Needs:*** Less costly social care packages (especially for those with higher care needs),
- ***Increased Efficiencies:*** Care workers ability to treat many residents without moving from home to home,
- ***Improved Outcomes for Individuals:*** Increased sense of autonomy and security; fewer falls; reduced loneliness and depression; better mental health and quality of life; lower death rate in the period following moving in,
- ***Local Authority Housing Budgets:*** Freeing up homes for families and others on social housing waiting lists; reducing temporary accommodation costs.

Salford Council suggest in their Extra Care Strategic Development Report June 2019 that costs of £246 per week per resident (**£12,792 per annum**) could be avoided through care needs being met through ECH rather than by residential care.

Whilst not specifically targeting ECH, one of the most recent studies is a Report by Hyde Group and Sonnet Advisory & Impact published in July 2021 ***“The Value of a Hyde Tenancy 2020/21”***. It calculates the direct cost savings to society for each of its tenancies is **£14,781 per annum**.

Some of these benefits, such as savings to the Police, Justice and Education, will not necessarily apply to EC residents but there will be additional savings generated from ECH due to less reliance from residents on significantly more expensive residential care homes.

Preferred Homes Limited ('PHL') is currently working with local authorities who are assessing the financial benefits of ECH over alternatives in terms of both the housing and care needs of the elderly/vulnerable. This includes cost comparisons with alternative residential care homes and homecare alongside a more efficient use of existing social housing stock through better matching of housing to actual needs.

Taking into account inflationary pressures experienced over the past year alone, PHL estimates the financial benefits enjoyed by the public purse to be at least £10,000 per resident (potentially as much as £15,000) within an ECH supported living community.

For a typical 80 apartment Extra Care scheme, this would translate to annual savings of at least £800,000 or **£20 million** over a typical nominations period of 25 years. These savings will be enjoyed by a combination of stakeholders including the NHS, Local Authority care services and Local Authority housing budgets. A new 80 apartment ECH facility will typically inject approximately £16 million into the economy through total construction costs, supporting local jobs and associated contributions to the Treasury.

In a report published in 2016, The Strategic Society Centre and Anchor found that *"For one new retirement housing unit occupied by one person for at least 10 years, potential total savings are around £83,100 over the long-term. If two people occupy this unit for at least 10 years, potential total savings are around £111,400 over the long-term. Such potential economic effects can also be expressed at a population level. For example, using these figures we can estimate that if one couple for every 50 older homeowners moved into a new unit of specialist retirement housing for at least 10 years, this would yield savings in the long-term of between £675 million and £2.6 billion depending on the region or **£14.5 billion** across the country."*

Of the necessary 50,000 per annum new homes for elderly residents the Mayhew Review identifies, if just 5% (2,500 units) of this housing stock was given over to affordable EC residents, we estimate society would benefit from annual public purse savings of **£25 million** and an annual injection into the economy via the construction industry of **£500 million** – all of which will help to drive UK growth, help "level-up" sectors of the country and increase societal well-being.

Current government policy allows for the market sector to deliver housing stock - the market has not adequately responded particularly in poorer areas of the Country. However, Social housing should not be solely market led. The delivery of social housing should be promoted to a much greater extent by stakeholders (many of whom have conflicting budgetary constraints) and through legislative changes to allow Housing Associations, Registered Providers and developers to deliver a far greater proportion of the required housing stock.

January 2023

Relevant Publications & Extractions:

The Mayhew Review November 2022

<https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/The-Mayhew-Review-Future-proofing-retirement-living.pdf>

ECCT Report March 2019

<https://www.extracare.org.uk/media/1169231/full-report-final.pdf>

Extra Care Strategic Development Report 2019

<https://sccdemocracy.salford.gov.uk/documents/s19713/07%20-%20Appendix%202.pdf>

The Value of a Hyde Tenancy 2020/21

<https://www.hyde-housing.co.uk/media/6419/hyde-value-of-a-social-tenancy-2020-21-report.pdf>

Valuing Retirement Housing: Exploring the economic effects of specialist housing for older people – August 2016

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwj5qajjsn7AhVGi1wKHVTJADwQFnoECAkQAQ&url=https%3A%2F%2Fstrategicsociety.org.uk%2Fwp-content%2Fuploads%2F2016%2F08%2FValuing-Retirement-Housing.pdf&usq=AOvVaw04PKr6JBETfh62e4mkTOO3>

Extra Care Housing Evidence Base 2015 - London Borough of Richmond Upon Thames

Extra Care also offers cost savings to local authorities as households maintain independence and do not require residential care. These cost savings are derived from provision of flexible care and procurement efficiencies (providing care on one site rather than multiple sites) amongst other factors. Research shows that each year a resident postpones moving into residential care, the State saves on average **£28,080**.

Sonnet & Anchor Hanover Social Impact Report 2020

Social housing offers individuals and families communities of support and stability and provides a platform that enables people to enhance their lives. This delivers not just improvements in individual and community wellbeing and associated measurable savings in public service costs, but also real economic improvement in the workplace and in local area economic activity. Using the framework established in the value of a social tenancy research undertaken for the Hyde Group, we estimate that through the provision of a decent home at affordable rent the value of a social tenancy, for an older person who is not working and does not have young children, is at least **£3,400** a year.

The level of service provision in Anchor Hanover's Extra Care estates offer significant savings to both the local authority, in the form of reduced care costs, and the NHS, by tackling malnutrition and physical inactivity. In total, we estimate that Extra Care delivers savings of at least **£6,700** per resident per year.

Housing LIN Case Study 78 - The Business Case for Extra Care Housing in Adult Social Care: An Evaluation of Extra Care Housing schemes in East Sussex 2013

Enhanced services and value for older people - as people grow older their housing needs change. Supported housing responds to those needs by providing accommodation specifically designed to cater to them. Residents often move into supported housing in preparation for growing older or after experiencing a significant life change. Such changes might include retirement, the loss of a partner or the onset of a health issue. Unexpected loss, challenging situations and illness are part of our lives, but can cause significant stress.

As a result, many residents either enter supported housing at a point in their lives when they are vulnerable to isolation, depression, anxiety and a loss of purpose, or are likely to experience those life changes

*Extra care housing acts as a preventative model, supporting independence and avoiding admissions into residential care. Extra care housing is a more cost effective model of care delivery than other models, including residential care and care in the community. The resultant findings revealed that the financial impact of the findings was considerable, with the evaluation indicating that the cost of extra care housing was on average **half the gross cost** of the alternative placements.*

Leeds City Council – Extract 4.1.1 from Executive Board Report 2020

*Financial comparisons on the average cost of residential care (local authority and independent sector provision) versus Extra Care Housing reveal that Extra Care Housing, even with all care recipients having high care and support needs, provides the opportunity to realise significant system cost savings. Based on the minimum projected efficiency saving of £240 per week for an individual with high support needs applied against 100% of the scheme being affordable rent and the Council receiving 100% nomination rights for a 60 unit scheme, this would generate an estimated system cost saving of approximately **£748,800 per annum (£12,480 per person per annum)**.*

Housing LIN Case Study 129 – Evaluating Extra Care Housing in North East Lincolnshire 2016

*An estimate of savings to the Local Authority of home care or care home services compared with the likely costs estimated from the Control Group are £260k pa, which is an average of **c£4,600** per person.*

Southampton City Council & HLIN 2019 - Identifying the Health Care System Benefits of Housing with Care

While the body of research available that identifies the health impacts of housing with care has been relatively limited, all the identified evidence suggested positive impacts on the health care economy, which included:

- Reductions in the number of GP visits (by housing with care residents).*
- Reductions in the number of community health nurse visits (amongst housing with care residents).*
- Reductions in the number of non-elective admissions to hospital (by housing with care residents).*
- Reductions in length of stay and delayed discharges from hospital (amongst housing with care residents).*
- Reductions in ambulance call outs, typically linked to reduced incidence of falls (amongst housing with care residents).*

*When quantified, it was possible to estimate that for each person living in the housing with care settings, the financial benefit to NHS was approximately **£2,000** per person per annum (calculated as a costs benefit to the health care system).*

Oxfordshire County Council - Market Position Statement Supplement Relating to ECH 2019.

*When making a business case for ECH compared to care homes/homecare etc we use a crude calculator that estimates a £85k annual saving based on 60 units – **£1,417** per person per annum.*

Cumbria County Council – Extra Care Housing and Supported Living Strategy 2016-2025

*As service users choose Extra Care Housing Accommodation rather than Residential Care Accommodation there is an estimated saving of around **£9,000** per year per placement. However, this strategy does not assume a cashable saving at this stage. In support of its strategic commitment, the Council is developing a capital programme to invest in and facilitate the ongoing development of Extra Care housing in Cumbria.*

North East Lincolnshire Council and HLIN Case Study 2016

*This report concluded Extra Care savings to the local authority over traditional homecare or residential care home services equated to an average of **£4,600** per person per annum in 2016.*

Subsidy Control Report

Prepared for: **Department for Business, Energy & Industrial Strategy (“BEIS”)**

Date: **20th May 2025**

Prepared by: **Exeter City Council (“ECC”)**

1. Executive Summary

1.1 This report outlines the assessment of the subsidy involved in the sale of the Former Clifton Hill Leisure Centre site at an undervalue to Preferred Homes Limited (“PHL”) to facilitate the development of extra care affordable housing (100% affordable rent at 80% of market rents). The assessment ensures compliance with the Subsidy Control Act 2022 and confirms alignment with the UK subsidy control principles.

1.2 The proposed subsidy aims to support the delivery of much-needed extra care housing, addressing local demand and contributing to social welfare without distorting competition or investment within the UK market.

1.3 The delivery of circa 72 affordable rent homes prioritised for Exeter’s elderly residents on the housing register should save public purse costs long term.

2. Description of the Subsidy

2.1 Nature of the Subsidy

- Type of Subsidy: **Transfer of land at an undervalue**
- Market Value of the Site: **£3.8m**
- Agreed Sale Price: **£3.375m**
- Undervalue Amount (Subsidy Value): **£425,000**

2.2 Purpose of the Subsidy

- Following a national marketing campaign in Autumn ’24 and an informal tender disposal process in October and November ’24 (restricted to preclude Purpose Built Student Accommodation “PBSA”) Preferred Homes Ltd submitted the highest offer, £3.375m, based on a 100% affordable rent 72 unit extra care scheme. The purpose of the subsidy, estimated against a valuation for PBSA, is to facilitate the delivery of the affordable rent extra care scheme which will be made available, via a s.106 planning obligation agreement, to residents with a local connection to Exeter for the first 25 years of the scheme.
- To address a specific local need for affordable extra care housing, as identified in:

- Devon County Council's ("DCC") latest Adult Social Care Strategy which can be found here ([Our vision - Promoting independence](#)) and confirms DCC's intension to grow Extra Care Living,
- the latest Exeter Local Housing Needs Assessment ([Exeter Local Housing Needs Assessment](#)).
- DCC's recent February 2025 Market Position Statement (with 151 extra care units of current unmet commissioned need in Exeter) - [Market Position Statement: February 2025 - Provider Engagement Network](#); and
- The Devon Housing Commission Report which specifically identifies the need for Extra Care housing in Devon (due to it's rapidly ageing population driven by the internal migration of older people) - [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#)
- To support vulnerable and elderly individuals with specialist housing and care provision.
- To contribute to government objectives of increasing affordable housing stock.

2.3 Beneficiary Details

- Recipient Name: **Preferred Homes Limited ("PHL"), 2nd Floor Market Place, London W1W 8AG**
- Recipient Type: **Registered Provider**
- Legal Status: **Registered Provider of Social Housing (reg. no. 5093)**

3. Compliance with the Subsidy Control Act 2022

3.1 The subsidy is assessed against the seven subsidy control principles as set out in Section 12 of the Subsidy Control Act 2022:

3.1.1 Principle A – Common Interest

The subsidy facilitates the development of extra care affordable housing, addressing a clear public policy objective:

- ✓ Supports social welfare by providing housing for vulnerable individuals,
- ✓ Aligns with government priorities to increase affordable housing provision,
- ✓ Increased social value/reduced care and health costs of providing extra care housing (Homes England's "Measuring the Wellbeing and Fiscal Impacts of Housing for Older People" see: https://assets.publishing.service.gov.uk/media/66a8cb89a3c2a28abb50d984/Measuring_the_Wellbeing_and_Fiscal_Impacts_of_Housing_for_Older_People.pdf.)

3.1.2 Principle B – Proportionality

- ✓ Preferred Homes Ltd were the highest bidder in the market place and the undervalue has therefore been limited to the minimum necessary to enable the project to proceed; and
- ✓ Without the subsidy, the project would be unviable as it would not be able to compete with the higher alternative use values of the land (in this case a notional PBSA value). Given members will not accept the disposal of land for PBSA in the City the alternative for the site is for it to remain vacant.

3.1.3 Principle C – Design for Change of Behaviour

- ✓ The subsidy enables the recipient to undertake a project that would not be feasible under normal market conditions; and
- ✓ Encourages investment in a sector (extra care affordable housing) with positive social outcomes.

3.1.4 Principle D – Competition and Investment Effects

- ✓ The subsidy does not disproportionately distort competition, as it supports social housing development, a non-commercial activity; and
- ✓ The recipient is subject to regulatory frameworks governing affordable housing provision.

3.1.5 Principle E – Least Distortionary Means

- ✓ The land sale at undervalue is a targeted, transparent, and efficient means of achieving the policy objective.

3.1.6 Principle F – Balancing Beneficial and Negative Effects

- ✓ Any impact on competition is outweighed by the significant social benefits; and
- ✓ No negative effects on UK trade or investment are expected.

3.1.7 Principle G – Compliance with International Obligations

- ✓ The subsidy is unlikely to affect international trade, as it is focused on local affordable housing provision.

4. Subsidy Control Assessment Conclusion

4.1 The sale of the Former Clifton Hill Leisure Centre site at an undervalue constitutes a subsidy under the Subsidy Control Act 2022. However, the subsidy complies with the seven subsidy control principles and is necessary to enable the provision of extra care affordable housing.

4.2 The subsidy:

- ✓ Achieves a public policy objective (affordable housing provision)
- ✓ Is proportionate (subsidy limited to the minimum necessary)
- ✓ Minimises distortion to competition and investment

4.3 As a result, ECC believes the subsidy is lawful and justifiable under the Act.

4.4 If the subsidy is not provided (undervalue sale is not approved) the site will remain vacant as members are not prepared to market the site for PBSA.

5. Next Steps and Transparency

The subsidy will be recorded in the UK Subsidy Control Database in accordance with transparency requirements. Any further requirements or clarifications from BEIS will be addressed as needed.

6. Appendices

Appendix 1 – Preferred Homes – Public Purse & Societal Savings: Social & Economic Impact of Extra Car Housing

Mr D Hodgson
Director of Corporate Resources
Exeter City Council
Letter sent by email
dave.hodgson@exeter.gov.uk

Tandra Forster
County Hall
Topsham Road
EXETER
EX2 4QD

Email: tandra.forster@devon.gov.uk

7 May 2025

Dear David,

I am writing on behalf of the Integrated Adult Social Care Commissioning team at Devon County Council to express our strong support for the proposed Extra Care Housing development at Clifton Hill in Exeter.

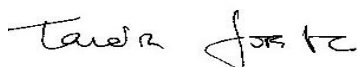
As you are aware, the demand for high-quality, accessible housing options for older adults and individuals with care needs is increasing. Extra care housing provides a vital solution by offering a combination of independent living with the availability of on-site care and support services. This model not only promotes independence and well-being but also helps to reduce the pressure on traditional residential care facilities and hospital services. The recent Devon Housing Commission report delivered by Lord Best and team - [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#) – confirms this together with evidencing the need for more developments of this type in Exeter.

The proposed development at Clifton Hill is well located, close to amenities and the NHS and aligns with our strategic objectives to enhance the provision of care and support within the community. It will provide much-needed housing options for older adults, enabling them to live independently whilst also having access to the care and support they require to retain their independence. Furthermore the development will create job opportunities and contribute to the local economy.

In conclusion, we fully support this proposal application and believe that the extra care housing development at Clifton Hill will be a valuable asset to our community.

Thank you for considering our views and if you require any further information or wish to discuss this matter in more detail, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Tandra Forster".

Tandra Forster
Director of Integrated Adult Social Care

cc David Martin, Lawrence Blake and Roger Clotworthy

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Equality Impact Assessment: Disposal of land at Grace Road Fields for the facilitation of a Low Carbon Exeter District Heat Network

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 (20 th May 2025)	Disposal report seeking authority to dispose of the Former Clifton Hill Leisure Centre.	A subject to planning disposal of the Former Clifton Hill Leisure Centre site to Preferred Homes Limited for the delivery of an extra care affordable rent older peoples housing scheme	No potential impact has been identified on people with protected characteristics as determined by the Equality Act 2010 because the proposals do not seek to reduce or change

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
			services to the extent that they will impact on any individuals including those with protected characteristics. Clifton Hill is a cleared operational asset and there are no existing residents or tenants.

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).			No reduction in council services and no existing residents or tenants
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			No reduction in council services and no existing residents or tenants

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
adverse impact on their ability to carry out normal day-to-day activities.			
Sex/Gender			No reduction in council services and no existing residents or tenants
Gender reassignment			No reduction in council services and no existing residents or tenants
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).			No reduction in council services and no existing residents or tenants
Sexual orientation (including heterosexual, lesbian, gay, bisexual).			No reduction in council services and no existing residents or tenants
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).			No reduction in council services and no existing residents or tenants
Pregnancy and maternity including new and breast feeding mothers			No reduction in council services and no existing residents or tenants
Marriage and civil partnership status			No reduction in council services and no existing residents or tenants

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

Officer: Dave Hodgson, Strategic Director for Corporate Resources
Date: 20th May 2025

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