

Agenda for Overview Committee Thursday, 20th February, 2025, 6.00 pm

Members of Overview Committee

Councillors: A Bailey, B Bailey, K Blakey, O Davey, T Dumper (Vice-Chair), P Fernley, D Haggerty, A Hall (Chair), J Heath, Y Levine, M Martin, H Riddell and D Wilson

Venue: Council Chamber, Blackdown House, Honiton

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(or group number 01395 517546)

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- 1 Minutes of the previous meeting held on 24 October 2024 (Pages 3 - 6)
- 2 Apologies
- 3 Declarations of interest
Guidance is available online to Councillors and co-opted members on making [declarations of interest](#).
- 4 Public Speaking
Information on [public speaking](#) is available online.
- 5 Matters of urgency
Information on [matters of urgency](#) is available online.
- 6 Confidential/exempt item(s)
To agree any items to be dealt with after the public (including press) have been excluded. There are **no** items that officers recommend should be dealt with in this way.
- 7 Revisions to Street Naming and Numbering Policy (Pages 7 - 28)
- 8 Wildlife Improvement Policy (Pages 29 - 61)
- 9 Coach Tourism in East Devon (Pages 62 - 72)
- 10 E-Petitions report
Update 17/02/25: This item is deferred to the next meeting, scheduled for 27/03/25
- 11 Work Programme 2024 - 2025 (Pages 73 - 87)

To consider the Cabinet Forward Plan; would the Committee wish to receive a report on key decisions prior to Cabinet?

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[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Overview Committee held at Council Chamber, Blackdown House, Honiton on 24 October 2024

Attendance list at end of document

The meeting started at 6.00 pm and ended at 7.32 pm

9 Minutes of the previous meeting held on 30 May 2024

The minutes of the previous meeting held on 30 May 2024 were approved as a true and accurate record.

10 Declarations of interest

Minute 14, East Devon Trees, Hedgerow and Woodlands Strategy
Cllr Tim Dumper, Affects Non-Registerable Interest, Member of Exmouth Town Council (ETC) and working on ETC's Tree Forum.

11 Public Speaking

No members of the public had registered to speak at the meeting.

12 Matters of urgency

There were no matters of urgency.

13 Confidential/exempt item(s)

There were no confidential/exempt items.

14 East Devon Trees, Hedgerow and Woodlands Strategy

The District Ecologist introduced this item and welcomed Ben Coles of Treeconomics Ltd to the meeting. Treeconomics Ltd had been appointed in July 2024 to start the process of leading the consultation and shaping of the East Devon Trees, Hedgerow & Woodland Strategy (THaWS).

The THaWS is a ten-year strategy which aligns with the Devon Tree and Woodland Strategy, Climate Change Strategy, Local Plan review and Nature Recovery Plan.

Mr Coles and the District Ecologist delivered a presentation to members which provided an overview of the THaWS, its key themes and aims, its development and timeline and a summary of the results from public consultation. The Strategy is expected to be finalised in December 2024.

Members were asked to consider the THaWS and make recommendations, before it is presented to Cabinet for approval in January 2025.

Discussion and clarification included the following points:

- The strategy sets out a high level aspiration of 30% canopy cover for the district, partly through tree planting but mainly through maintenance and enhancement of existing trees.

Canopy cover can be easily measured using satellite imagery or other technology and progress can be tracked by replicating the exercise at 5 or 10 year intervals.

- Some members were concerned that the strategy does not set a target for the number of trees and felt that canopy cover is less meaningful to residents than numbers. The District Ecologist responded that it is not possible or viable to monitor numbers of trees or to track progress, without access to private land. He added that canopy cover targets better reflect the varying methods of tree establishment and added that, as a district, natural regeneration is the favoured approach.
- In response to a member's question, it was confirmed that a policy is not currently in place concerning replacement of trees on Council owned land. Consideration is being given to whether planting trees is best, or if the focus should be on natural regeneration and maintenance of nearby existing trees.
- The THaWS is a high level strategy document intended to be holistic in its approach and as accessible as possible. Some members expressed concern that the document is not easy for the lay person to understand and engage with. It was felt however that it will be understood by people who activate members of the public and one member outlined the Tiny Forest project in Exmouth, as an initiative in which local residents had become actively involved.
- 6% of consultees had responded that a benefit of trees was noise reduction, and the District Ecologist would ensure this is added the Trees Benefits section of the strategy.
- The actions set out in the strategy are currently in draft format and decisions will need to be taken on where to channel the council's limited resources. Community engagement has been identified as high priority due to the cumulative returns.
- Members recognised the importance of hedgerows in the strategy and were keen to engage the farming community in the planting and protection of hedgerows. It was acknowledged that the council has no direct influence in this respect, but the East Devon National Landscape Team are engaged with farmers on the ground, and management of hedgerows and natural regeneration is covered in the Farming in Protected Landscapes (FiPL) programme.
- Members commented on the importance of protecting existing trees and asked if the policy on enforcement of Tree Preservation Orders could be tightened up. In response, it was noted that East Devon has one of the highest levels of TPOs amounting to more than the whole of Cornwall. To increase the number of TPOs would have significant cost and resource implications arising from the associated administration. The public are asked to contact the Council without delay if they see a tree being cut down.
- Members raised concern that mature trees are being felled on the insistence of insurance companies where it is suggested the trees are undermining the walls of houses. Mr Coles explained that he is currently writing an insurance claims best practice appendix including a subsidence mitigation protocol, which will give more power to the Council's Countryside team in contesting subsidence claims.
- The Local Plan is the mechanism through which the Council can best influence the planting of trees and hedgerows in the district, and the Council's requirements will be set out in detail in an associated Supplementary Plan Document.
- Members were concerned that the proposed Tree & Woodland Project Officer post will be at the expense of a part time Tree Warden, with implications for enforcement and the protection of existing trees. In response, the District Ecologist highlighted the cumulative gains that the Project Officer's role will bring from delivering the Tree Strategy and engaging the community, and stated that this can be as important as direct enforcement for looking after the treescape.

RECOMMENDED to Cabinet:

- The adoption of the final draft of the East Devon Tree, Hedgerow and Woodland Strategy 2024 – 2034 which reflects the ambitions and opportunities to protect East Devon's treescape and create opportunities for tree planting working in partnership with key stakeholders.
- To appoint a part time Tree & Woodland Project Officer role to enable the delivery of the Strategy. The budget and costs for this role are already secured within the existing salary budget due to a vacant part time role within the Tree team.

- To note the Overview Committee's concerns about the reduction of the enforcement role within the Tree team and to consider to continue to include this vacant post in the establishment, going forward.

15 **Work Programme 2024 - 2025**

The Committee considered the Cabinet Forward Plan and noted the Work Programme for 2024-2025.

Cllr Del Haggerty provided an update on the progress of the Coach Tourism in East Devon Task and Finish Forum and thanked officers for their ongoing support.

The Chair reminded members that a joint meeting of the Scrutiny Committee and the Overview Committee is scheduled for December 2024 to review the Directorate Plans, followed by a Joint Budget Meeting in January 2025.

Attendance List

Councillors present:

O Davey
T Dumper (Vice-Chair)
D Haggerty
A Hall (Chair)
J Heath
Y Levine
M Martin

Councillors also present (for some or all the meeting)

I Barlow
R Collins
M Goodman
G Jung

Officers in attendance:

Simon Davey, Director of Finance
Sarah James, Democratic Services Officer
Anita Williams, Principal Solicitor (Deputy Monitoring Officer)
Chris Hariades, Landscape Architect, Development Management
Sarah Jenkins, Democratic Services Officer
Andrew Wood, Director of Place
Will Dommatt, District Ecologist

Also in attendance:

Ben Coles, Treeconomics Ltd

Councillor apologies:

A Bailey
B Bailey
P Fernley
V Johns
H Riddell

K Blakey

Chair:

Date:



Report to: Overview Committee

Date of Meeting 23rd January 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Revisions to Street Naming and Numbering Policy

Report summary:

The council's Street Naming and Numbering Policy was originally used in 2008. The policy has been aligned with Exeter City Council and Teignbridge District Council's approaches. This has simplified the process and facilitated implementation by Strata the council's ICT provider, who implement the policy on a day-to-day basis for the three councils.

A few statutory legislation changes and minor revisions to the policy have been added to reflect the reality of street naming and numbering and to clarify procedures.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

- (1) That the committee recommends that cabinet approves the proposed revisions to the council's Street Naming and Number Policy.

Reason for recommendation:

To clarify the council's position on street naming and numbering and to ensure effective implementation.

Officer: Nick Wright: nwright@eastdevon.gov.uk 01395 517548

Portfolio(s) (check which apply):

- ☐ Climate Action and Emergency Response
- ☐ Coast, Country and Environment
- ☒ Council and Corporate Co-ordination
- ☐ Communications and Democracy
- ☐ Economy
- ☐ Finance and Assets
- ☐ Strategic Planning
- ☐ Sustainable Homes and Communities
- ☐ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☐ Carbon neutrality and ecological recovery
 - ☐ Resilient economy that supports local business
 - ☐ Financially secure and improving quality of services
-

Report in full

This is a joint report for East Devon, Exeter City Council and Teignbridge District Council on proposed legislative and other minor changes to the Street Name and Numbering (SNN) policy. The policy has been prepared in partnership with the 3 councils, led by STRATA. The full report is attached.

The policy falls in line with the Post Office and Fire and Rescue requirements on SSN.

This attached report has been agreed by Exeter City Councils, Customer Focus Scrutiny Committee and their Executive committee. It has also now been approved by Teignbridge District Council Executive Committee.

All addresses form part of the National Land and Property Gazetteer (NLPG) which covers the whole of England and Wales. The NLPG uses the British Standard BS7666 (Parts 1 and 2) to ensure data format consistency across the country. Each record has a unique property reference number (UPRN) which provides a reference key to join related address records across different datasets.

All Local Authorities are statutorily required to maintain a Local Land and Property Gazetteer (LLPG) which is a definitive master list of all land and property addresses within the Authority, together with comprehensive attribute data for each address including location coordinates. This forms part of the National Land and Property Gazetteer (NLPG). Every Local Authority is obliged under the Data Co-operation Agreement to create and maintain its own LLPG for transfer to the national hub for inclusion into the NLPG.

A property must be registered by following the Street Naming and Numbering procedure. If a property is not registered, it will not be added to the Royal Mail Address Database or the National Land and Property Gazetteer. Therefore, it will not be recognised as an official postal address by agencies such as the Emergency Services, The Valuation Office, Land Registry, utility companies etc.

The report contains some minor changes from the use of either a living or deceased persons name to the specification for developers to use. For example, the use of a name which relates to any person either living or deceased should be avoided as public perception of a deceased person may change over time. Should a name be proposed, it is recommended the person should have been deceased for at least 50 years and is deserving of public recognition. The proposer is required to obtain written permission from the person's family or estate administrators and names must comply with the street naming criteria.

Financial implications:

None

Legal implications:

There are no legal implications requiring comment (002512/10 December 2024/DH).

Street Naming and Numbering Policy



Issue details	
Title:	Street Naming and Numbering Policy
Version number	Version 1.2
Officer responsible:	Martin Millmow
Authorisation by:	Steve Mawn
Authorisation date:	July 2024
Review date:	July 2025

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1. Introduction

- 1.1. The naming and numbering of streets and buildings in East Devon, Teignbridge and Exeter, is controlled under the Town Improvement Clauses Act 1847
- 1.2. The prime objective in naming streets and numbering buildings is to facilitate easy identification of premises by the emergency services, postal / delivery services and general visitors to the area, and to aid in the updating of the National Land and Property Gazetteer.
- 1.3. The National Land and Property Gazetteer (NLPG) and Local Land and Property Gazetteer (LLPG). All addresses form part of the National Land and Property Gazetteer (NLPG) which covers the whole of England and Wales. The NLPG uses the British Standard BS7666 (Parts 1 and 2) to ensure data format consistency across the country. Each record has a unique property reference number (UPRN) which provides a reference key to join related address records across different datasets.
- 1.4. All Local Authorities are statutorily required to maintain a Local Land and Property Gazetteer (LLPG) which is a definitive master list of all land and property addresses within the Authority, together with comprehensive attribute data for each address including location coordinates. This forms part of the National Land and Property Gazetteer (NLPG). Every Local Authority is obliged under the Data Co-operation Agreement to create and maintain its own LLPG for transfer to the national hub for inclusion into the NLPG.
- 1.5. If a property is not registered by following the Street Naming and Numbering procedure it will not be added to the Royal Mail Address Database or the National Land and Property Gazetteer and will therefore not be recognised as an official postal address by Local Authority departments or agencies such as the Emergency Services, The Valuation Office, Land Registry, utility companies etc.
- 1.6. Requests for addresses for new properties and requests to change the name or number of an existing property, should be applied for online using the relevant Local Authority website form following the procedures detailed in this policy.
- 1.7. The Local Authorities Commitments
 - To treat everyone in a fair and equal manner in line with our Equality and Diversity Policy.
 - To endeavour to deliver best value and to place the customer first.
 - To meet our statutory duties and to achieve the targets set out in the Performance Monitoring section.

2. Charging for Street Naming and Numbering

- 2.1 Local Authorities can only charge where they provide a service they are authorised to do, but not required to do. The charge must not exceed the cost of providing the service.
- 2.2 There is a Street Naming and Numbering charge for the following:
 - renaming existing properties
 - renumbering existing properties
 - alterations in either names or numbers to new developments after initial naming and numbering has been undertaken.
 - Informing the bodies listed in Appendix A of new/altered addresses.
- 2.3 These charges will be reviewed on an annual basis by Strata and new charges approved by the Local Authorities.
- 2.4 The fee is required before the Street Naming and Numbering process can proceed.

- 2.5 All documents relating to street naming and numbering will be deleted automatically after six years in line with our retention policy. Where documents have been deleted, requests for written confirmation of an official address or a change of property name, will incur a fee (determined in April each year) to cover researching and preparing a new confirmation document.

3. Naming Streets

- 3.1 The Local Authority is responsible for the naming of private streets, adopted streets and streets which are to be adopted by Devon County Highways. In practice the District Councils follow the recommendation of the Town or Parish Council whilst Exeter City Council follow the recommendations of the Ward Councillors. Proposed street names must meet the naming criteria.
- 3.2 **Exeter City Council** – Developers are required to submit suggested road names. It is recommended that more than one name per street be supplied in the event that there is an objection to their first choice. Suggested road names are forwarded to Ward Councillors, Royal Mail Address Development Centre and Devon & Somerset Fire & Rescue Services for consideration. If a suggested road name does not meet the criteria, the developer will be advised to provide an alternative. If an agreement is not reached on an acceptable name this will result in a decision being made by a Corporate Director in conjunction with the Chairman or Vice Chairman of the relevant Local Authority Development Control Committee.
- 3.3 **Teignbridge District Council** and **East Devon District Council** welcome suggested names from developers however suggested road names are forwarded to the Town/Parish Councils for consideration.
- 3.4 Town/Parish Councils may wish to keep a bank of names for future developments in their areas. We recommend they liaise with developers when they are aware of a new approved site. Street naming and numbering become involved with a site at a much later stage and would appreciate that any names forwarded to them at the addressing stage are acceptable to both parties. Reasons must be provided for any proposed names. Strata are unable to bank these names on their behalf.
- 3.5 It is desirable that any suggested road name should have some connection with the area.
- 3.6 If proposals comply with the Street Naming and Numbering policy, and street names do not meet with an objection, the new address will be formally allocated and all relevant bodies listed in Schedule A will be notified.
- 3.7 Where Street names or numbers have been established without following the Street Naming and Numbering procedure, the Local Authority has the authority to issue Renaming or Renumbering Orders, under Section 64 of the Town Improvement Clauses Act.
- 3.8 Criteria for naming streets

The Street Naming and Numbering team will use the following guidelines when agreeing an address. Developers, Ward Councillors and Town and Parish Councils should follow these guidelines for any suggested street names:

- 3.9.1 New road names will not be assigned where developments can satisfactorily be included in the existing numbering scheme of the street providing access.
- 3.9.2 New street names must avoid duplicating any similar name already in use in a town/village or in the same postcode area. A variation in the terminal word, for example, "street", "road", "avenue", will not be accepted as sufficient reason to duplicate a name as it can have a detrimental effect in an emergency situation. This is in line with Government guidance found in circular 3/93. This also reduces the need for new Street Names to be further identified by a locality.
- 3.9.3 This also applies to residential and business addresses on a site, for example Church Close and Church Units

- 3.9.4 Street names should not be difficult to pronounce or to spell or open to interpretation by shortening or graffiti in any way.
- 3.9.5 Street names should, where possible, reflect the history or geography of the site or area. Local historical societies may be able to assist with this.
- 3.9.6 Names which can be considered or construed as obscene, racist or which would contravene any aspect of the Local Authorities Equal Opportunities Policy will be rejected.
- 3.9.7 Street names that could be construed as advertising are unacceptable.
- 3.9.8 Names consisting of, referring to, or derived from any group or company will not be considered.
- 3.9.9 The Local Authority will not adopt any unofficial 'marketing' titles used by developers in the sale of new properties.
- 3.9.10 The use of North, East, South or West is only acceptable where the road is continuous and passes over a major junction. It is not acceptable when the road is in two separate parts with no vehicular access between the two.
- 3.9.11 Two phonetically similar names within a postal area, locality, town or village are to be avoided. For example, Alfred Road and Alfred Close or Churchill Road and Birch Hill Road.
- 3.9.12 The use of a name which relates to any person either living or deceased should be avoided as public perception of a deceased person may change over time. The proposer is required to obtain written permission from the person's family or estate administrators and names must comply with the street naming criteria.
- 3.9.13 Consideration will be given to commemorate service men and women with a demonstrable personal connection with the local area, who have lost their lives in service of their nation since 1914. Written permission from the person's family is not required in this instance.
- 3.9.14 The use of a name with Royal connotations should be avoided. Consent of the Lord Chamberlain's office must be obtained by the proposer if a name with any reference to the Royal family or the use of the word 'Royal' is suggested.
- 3.9.15 The use of tree names should be avoided due to the duplication of many existing streets with such names. Requests will only be considered if the proposer can show that confusion is not likely to take place, and that the proposed name has local relevance. This includes all names based on "Orchard".
- 3.9.16 the use of numbers as the first part of a street name is not permitted. For example, 20 Four Elms Hill could be misconstrued in an emergency situation as 24 Elms Hill.
- 3.9.17 Street names should not begin with "The".
- 3.9.18 Street Names should not have more than four words including the suffix.
- 3.9.19 Street Names should not be more than 30 characters long.
- 3.9.20 All street names, stored in databases, must meet the standards set out in BS7666. This restricts the use of punctuation marks and special characters e.g. apostrophes, hyphens, ampersands. This prevent problems arising when searching address databases.

3.9.21 Exceptions: Single or dual names without suffixes are acceptable in appropriate places (for example, Broadway for major roads only) such names will require approval by the Parish/Town Council for Districts and Ward Councillors for Exeter and be appropriate for the locality.

4. Procedure to name/re-name an existing street, road or lane

- 4.1 Requests to name an unnamed street or rename a street will only be progressed if it can be demonstrated that the owners of all of the affected properties have been consulted and at least two thirds are in agreement. A canvas form detailing the changes and signed by all of the property owners would be acceptable.
- 4.2 For Exeter, requests to name a currently unnamed street or to rename a named street will be forwarded to the relevant Ward Councillors. For the Districts, requests to name a currently unnamed street or to rename a named street will be forwarded to the relevant Town or Parish Council. Reasons must be provided for any proposed names. The relevant body will then need to agree to the request, find the suggested name acceptable, and arrange for the affected property owners to be canvassed.
- 4.3 In the case of a privately owned street, the request will only be actioned if the owner of the street agrees. Proof of ownership will be required e.g. Land Registry documentation.
- 4.4 Requests to rename an existing street must be justified by legitimate reasons in order for it to be forwarded to the relevant Ward Councillors or Town / Parish Council. A dislike of a street name would not normally constitute a legitimate reason for changing it.
- 4.5 The suggested new street name will need to be confirmed as acceptable by Royal Mail and / or the Fire & Rescue Service. Final confirmation for Exeter City street names will be required from the Corporate Director.
- 4.6 Local Authority departments and relevant parties including Royal Mail, Ordnance Survey, Council Tax, the Local Land and Property Gazetteer team and emergency services will be informed of the road name change and any resulting address changes. A full list of those informed is included in Appendix A
- 4.7 All costs associated with providing and erecting new street nameplates will have to be met by the owners of the properties who request the new street name except in exceptional circumstances where, at its discretion, the Town / Parish Council / City Council will provide and install the nameplates. Once sited, the District Council or City Council will maintain all nameplates on the street if it is adopted by the Highway Authority.
- 4.8 If a change of address is not registered by following the Street Naming and Numbering procedure it will not be added to the Royal Mail Address Database or the National Land and Property Gazetteer and will therefore not be recognised as an official postal address by Local Authority departments or agencies such as the Emergency Services, The Valuation Office, Land Registry, utility companies etc.

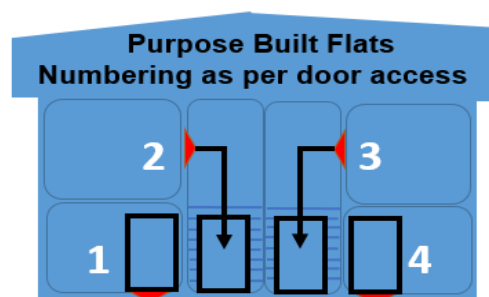
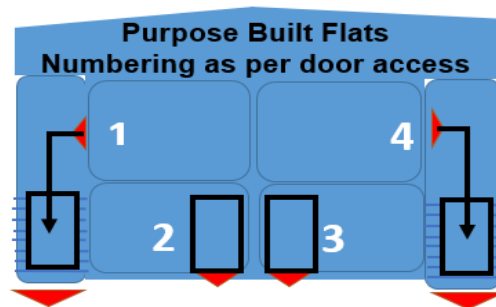
5. Unofficial Street Names

- 5.1 Locally known street names will not have street nameplates unless they form part of the official postal addresses of the properties in those streets.
- 5.2 If street nameplates have been erected, or have been requested, and the name does not form part of the official postal address, the relevant Ward Councillors for Exeter or the Town or Parish Council for the Districts should canvas the affected residents.
- 5.3 If residents agree to an address change to include the name displayed on the street nameplate, the street nameplate can remain or signs can be purchased by the Town or Parish Council. This could result in a change of postcode. (Refer to 7.9)

- 5.4 If the residents do not agree to an address change, the existing street nameplates will be removed to prevent confusion for delivery and emergency services.
- 5.5 Only official road names, which form part of an official postal address, can be displayed on street nameplates.

6. Guidelines for naming and numbering properties

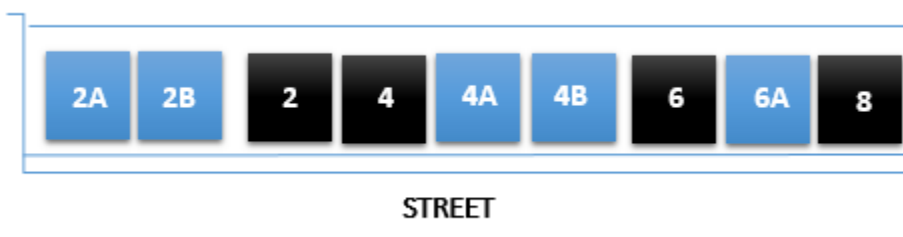
- 6.1 A new street will be allocated a street name and the properties within that street will be allocated numbers, regardless of whether the street from which it is accessed is a named or unnamed street.
- 6.2 A new street should generally be numbered with odd numbers on the left side and even numbers on the right side. Consecutive numbering, in a clockwise direction, is preferred for a cul-de-sac.
- 6.3 Additional infill properties, in streets which are currently numbered, will always be allocated a postal number. Alias names can be added if requested by the owner.
- 6.4 Private garages and similar buildings used for housing cars and similar will not be numbered.
- 6.5 Stables, outbuildings and parcels of land will not be allocated official postal addresses unless planning permission is approved for residential conversion or occupied offices at the site.
- 6.6 A proper numbering sequence shall be maintained, with all numbers included unless the omission of a number (for example 13) is specifically requested at the time of application.
- 6.7 Numbering out of sequence is not permitted.
- 6.8 Buildings (including those on corner sites) are numbered according to the street in which the main entrance is to be found.
- 6.9 The manipulation of numbering in order to secure a "prestige" address, or to avoid an address which is thought to have undesired associations, will not be sanctioned.
- 6.10 If a building has entrances in more than one street, is multi-occupied and each entrance leads to a separate occupier, then each entrance should be numbered in the appropriate road. Exceptions may be made, depending on circumstances, for a house divided into flats.
- 6.11 Blocks of Flats - Each dwelling, within a block of flats up to six storeys in height, is usually allocated a number. If the block exceeds this height, or there are insufficient numbers available due to existing development, the building can be named and numbered.



6.11.1 Changes to building names will incur our standard fee.

6.12 The conversion or sub-division of a property to flats will be numbered rather than described or lettered, for example, "Flat 1 36" not "36A", "First Floor Flat" or "Flat A".

6.13 Where new properties are built on an existing street, typically as infill development, and there are no available numbers to use whilst retaining the current sequence, a letter shall be used as a suffix, e.g. 2A, 2B, 2C. Where building takes place on the site of a demolished property, the new building will inherit the existing building number.



6.14 Suffixes will be avoided wherever possible.

6.15 For new developments, where additional properties have been requested after the initial numbering, the entire street will be renumbered. This will incur a charge.

6.16 For an infill of two or more properties accessed via a roadway (private or otherwise), which has no existing property numbers, the properties will be numbered and a 'sub-road' name, in agreement with the developer, will be allocated for the buildings e.g. 1 – 4 Country Cottages. Alternatively, the roadway will be officially named, following the Street Naming and Numbering procedure, and the properties will be numbered. It may be necessary to include the main road name, e.g. 1 to 4 Curlew Mews, High Street, to assist in locating the site.

6.17 Where a property has a postal number it must be used and displayed. Where a name has been given to a property, in addition to the official postal number, the number must always be included in the address. The name cannot be regarded as an alternative. This is enforceable under section 65 of the Town Improvement Clauses Act 1847.

- 6.18 Neither Strata nor the relevant Local Authority shall be liable for any mail delivery or credit rating problems caused by residents not using the given property number.
- 6.19 For private houses it is sufficient that the name should not repeat the name of the road or that of any other house or building in the same locality-
- 6.20 New building names should not begin with "The".
- 6.21 The Local Authority will enforce numbering of properties if there are serious mail delivery problems or emergency service response issues. This can occur in streets where all properties have names, properties are not officially numbered or where numbers are not being displayed.
- 6.22 Royal Mail will only register properties which have a delivery point i.e. letter box, post box or pigeon hole.
- 6.23 Commercial / industrial sites will be numbered (as per the residential process above) using combinations of a number and letter where this is no alternative e.g. 1A, 1B etc.
- 6.24 For commercial properties, whenever possible, numbers will be allocated. If numbering is impractical, building names will be requested. The Local Authority will not register company/business names as the building name.
- 6.25 Where two or more properties on a numbered street are merged, one number will be retained for addressing purposes. For example, 4 and 6 Fore Street being combined would become 4 or 6 Fore Street (depending on the door access to the site).
- 6.26 Where a building is divided into business and residential parts and the residential element has its own access then this will be numbered independently e.g. 7 for the business and 7A for the residential element. If the site is on an unnumbered street, then the residential element should be named independently from the business to ensure a consistency of address should the business change e.g. The Swan Inn, Bank Street and Flat 1, *Building Name*, Bank Street.

The Local Authority cannot be held liable for mail delivery problems caused by failure to inform them of property name changes.

7. Criteria for assigning a New Postal Address

- 7.1 Under no circumstances will an official address be granted to a site (commercial or residential) without planning permission or if the site is subject to enforcement action.
- 7.2 Council Tax/Commercial rating and the Planning department will be notified of requests to address premises without planning permission or which are subject to planning enforcement.
- 7.3 If a site does not have Planning Permission or, is subject to enforcement action, there will be no official postal address registered with the Royal Mail. A descriptive address will be created to be held on the LLPG and used by Council Tax and other Local Authority departments.
 - 7.3.1 A descriptive address is to ensure the addressing or numbering sequence of any street is not disrupted by additional properties without planning permission and therefore likely to be subject to enforcement action which may ultimately result in their removal.
 - 7.3.2 Allocating a descriptive address to properties without planning permission will have no bearing on planning matters or be capable of being used in support of any planning appeal.

- 7.3.3 Descriptive addresses can be changed at a later date provided planning permission is approved and the applicant follows the street naming and numbering procedure. This will incur the standard fee.
Note: Should planning permission be granted at a later stage, it may be necessary to number the property if it is situated on a numbered street.
- 7.4 Postal addresses for agricultural or any other land, purely for deliveries or satellite navigation systems, are not permitted. An official postal address will be issued if there is a registered business or residential unit, with approved planning permission on the site with a secure delivery point.
This conforms to Royal Mail policy and guidelines.
- 7.5 The allocation and maintenance of Postcodes is the responsibility of Royal Mail.
- 7.6 Approved addresses are forwarded to Royal Mail who will confirm the postcode.
- 7.7 Royal Mail will not issue a postcode for a new street or property unless the request is made by the Local Authority.
- 7.8 A change of address could result in a change of postcode. This will be the decision of Royal Mail.
- 7.9 Localities within the official postal address are the responsibility of Royal Mail. Where applicants object to a locality name in their postal address, the Street Naming and Numbering team will advise them to consult Royal Mail, who has a procedure laid down in their code of practice by the Postal Services Commission for adding or amending locality details.
- 7.10 Applicants are reminded that postal addresses are not geographically accurate descriptions but routing instructions for Royal Mail staff and they can, and do, contain names for villages, towns and cities that are several miles away.
- 7.11 Royal Mail does not have the authority to issue or confirm postal addresses. It is responsible for setting the post town and post code for a property. On occasion, Royal Mail may use a different locality detail for their 'postal address' to the one held in the LLPG. The objective of the Local Authority is to ensure consistency between addresses in the LLPG and the Royal Mail address database.
- 7.12 Holiday Lets - The Local Authority will only request an official address from Royal Mail where we have an operational requirement to do so or we believe the property is being used for permanent residency. Such addresses will have to meet Royal Mail's requirements for secure delivery points and we will inform our enforcement section about the believed change of use.

8. Procedure for New Developments

- 8.1 Applicants are encouraged to contact the Local Authority prior to a formal application in order to get advice on the naming and numbering policy.
- 8.2 The property developer must not issue postal addresses, including postcodes, to potential occupiers, either directly or indirectly (for example via solicitors or estate agents) before formal approval has been issued by SNN. The Local Authority will not be liable for any costs or damages caused by failure to comply with this.
- 8.3 The applicant or developer is required to submit a suggested name or names for any new streets in East Devon. Reasons must be provided for any proposed names. Suggestions are optional within Exeter and Teignbridge.

- 8.4 It is recommended that more than one suggested name is submitted to avoid delay should there be an objection from the Local Authority, Royal Mail or Councillors.
- 8.5 Initial approval for street names will be sought from Royal Mail (and Devon & Somerset Fire and Rescue Service if required). If there are objections to a name an alternative will need to be submitted.
- 8.6 The proposed street names are passed to the relevant Ward Councillors for Exeter, or the Town or Parish Council(s) for the Districts for approval. Ward Councillors and the Town or Parish Councils can, at this stage, suggest their own names that conform both to our and Royal Mail policies.
- 8.7 While the relevant Local Authorities are the authority for naming streets, in practice they follow the recommendation of the Ward Councillors for Exeter and the Town or Parish Council for the Districts, as long as the proposed street names meets the naming criteria.
- 8.8 Ward Councillors for Exeter and the clerks to Town and Parish Councils will be consulted by email regarding the naming of streets or developments.

8.9 FOR DISTRICTS

- 8.9.1 Town and Parish Councils will be given 21 working days from the date of the consultation in which to respond with at least 2 proposed names per street (which must meet policy criteria), or agreement to the developer's proposal. Reasons must be given for any proposed names from the Town or Parish Council, and also reasons why a developers' proposal is not acceptable.
- 8.9.2 Town and Parish Councils will only be consulted on the naming or renaming of streets.
- 8.9.3 The Local Authorities reserves the right to name streets/developments without consulting the Town/Parish in circumstances where there is a Local Authority decision to name a street/development.
- 8.9.4 If the developer does not accept a name suggested by the Town/Parish Council, the District Councils reserves the right to make a final decision without further reference to the Town/Parish.

8.10 FOR EXETER CITY

- 8.10.1 Ward Councillors will be contacted via email and given 10 working days to respond to street name suggestions.
- 8.10.2 Where the Ward Councillors cannot agree on a street name, final approval of street names will be given by a Corporate Director in consultation with Chairman or Vice Chairman of the Development Control Committee.
- 8.11 Numbering of the new street(s) will be carried out following the guidelines within this policy. All properties on newly named streets will be allocated numbers. All new properties on existing streets will be numbered unless the existing properties on that street all have official dwelling names and no numbers, or in the exceptional circumstances outlined under the section "Guidelines for numbering buildings".
- 8.12 It is the responsibility of the developer to check and review all names and property numbers to ensure the properties are addressed correctly on the relevant street and are in a sensible 'walk' order. If it is discovered at a later stage that the access to a property has been changed, the property will be readdressed irrespective of whether it has been sold or not.
- 8.13 The Local Authority will instruct developers to site street nameplates prior to the occupation of new properties.
- 8.14 If the developer fails to erect street nameplates, Strata and the Local Authorities cannot be held liable for any issues that may arise.

- 8.15 Residents will be advised to contact the developer if there are nameplates which have not been erected on their street.
- 8.16 The Local Authority will no longer pursue developers who fail to erect nameplates. It is a private matter, on a privately owned site. The Local Authority will suggest that residents get together and speak to the developer to insist that nameplates are installed.
- 8.17 The developer must cover the initial costs of the street nameplates. When the road has been officially adopted, maintenance costs becomes the responsibility of the Local Authority.
- 8.18 When naming and numbering is complete the Local Authority will inform all of the bodies listed in Appendix A.
- 8.19 There is a charge for 'reworking' previously completed developments at our standard fee for each plot/postal address change.

9. Procedure for a Change of Address or Adding a Property Name

- 9.1 If the property has a house number, it is not permitted to replace the number with a name. However, the Local Authority will allow the addition of an 'alias name' to the address. The name will be held by Royal Mail on their 'alias file' and will not form part of the official address. The alias name can only be used with the property number, not as a replacement of it.
- 9.2 To request a change to an address the 'Change a property name' form should be completed on the relevant Local Authority website.
- 9.3 If a suggested house name is considered inappropriate by the Local Authority or the Royal Mail the application will not proceed until an alternative house name has been submitted.
- 9.4 Requests can only be accepted from the owner of the property.
- 9.5 A property name cannot be officially changed while the property is in the process of being purchased, that is until exchange of contracts. However, guidance on the acceptability of a suggested name can be given before this.
- 9.6 Suggested names will be checked to ensure there is no other property in the location with the same or similar name. The suggested name will be forwarded to Royal Mail who will consider the suitability of the name and if it could possibly result in delivery problems due to the similarity with other local names. Royal Mail cannot guarantee mail delivery if their advice is ignored. In these situations, we will formally advise the applicant against the name and may also contact those other affected properties.
- 9.7 In the absence of fraud or malice, we cannot oppose a property name which is the same or similar to another nearby, but we will advise against it. Owners/residents of affected properties may take legal action if they have delivery problems caused by such name changes.
- 9.8 Once all checks are satisfactorily complete and the necessary fee is received, the address change will be processed. Local Authority departments and relevant parties including Royal Mail, Ordnance Survey, Council Tax, the Local Land and Property Gazetteer team and emergency services will be informed of the address change. A full list of those informed is included in Appendix A.
- 9.9 The property owner will receive written confirmation of the address change.
- 9.10 Where it is determined that the current numbering system is causing delivery problems or emergency response issues, and more than one property is affected, the Local Authority will consider a request for an address change. However, should this affect the numbering of

neighbouring properties, a written agreement by all affected property owners, will have to be obtained by the person requesting the change.

- 9.11 If the access to a property is changed, and access to the property is from a road that differs from the road name in the existing postal address, the owner is required to contact the Local Authority to determine if the property requires a change of address. This could result in a different property number as well as a different road name and postcode.
- 9.12 If a property has a change of access making the existing address misleading, or creates problems for other properties, it will be necessary to change the address to ensure there are no issues for emergency and delivery services.
- 9.13 If the access to a property changes and the Local Authority is informed via complaints from other residents, the Local Authority will write to the property owner explaining the policy and, if possible, offer any possible options. However, the address will ultimately have to change.
- 9.14 To request a change to an address, the 'Change a Property name' form should be completed on the relevant Local Authority website.
- 9.15 There will be no charge to change a business name – if notified of a business name change, where possible, we will allocate a property number.

10. Street Nameplates

- 10.1 All costs for the erection of street nameplates and additional signage for new streets will be borne by the property developer. There are detailed specifications for street-nameplates, and their locations, and the Local Authority must be contacted for advice.
- 10.2 Maintenance of street nameplates and signage becomes the responsibility of the Local Authority when a street becomes adopted.
- 10.3 It is not lawful to erect a street nameplate until the street name has been confirmed in writing by Strata on behalf of the relevant Local Authority: Note: Contravention attracts a fine under the provisions of the Criminal Justice Act 1982 (Section 37(2) Standard Scale Level 1 offences). A daily penalty rate also applies in this case.
- 10.4 For private streets, the developer is responsible for the initial supply and installation of the street name plates. Thereafter the property owners are jointly liable for the maintenance and replacement of the signs.
- 10.5 The developer should advise prospective purchasers adjacent to the corner of a road, mews court or private drive that there is a probability that a street name plate may be erected within the boundary of that property and be fixed to the building or boundary wall. It is recommended that a suitably worded clause be added to the conveyance deeds of all new properties. *The Council will not accept responsibility for negotiating with the owners of the properties affected.*

Appendix A – **Departments and agencies informed by the Local Authority**

Valuation Office Agency

Address Development Centre

Plymouth Land Registry Survey Services

West Country Ambulance Service

Devon Fire & Rescue Service

Devon and Cornwall Constabulary

Devon County Council Highways

Other organisations are informed via the NLPG

Internally:

Planning Administration, including Land Charges

Electoral Registration

Council Tax

Terms Explained and Statutory Context

Definition of a street

The naming of a street includes any road, square, court, alley or thoroughfare, within the limits of the Towns Improvements Clauses Act 1847 or relates to any thoroughfare which when named will be included in an official postal address.

Public Health Act 1925

Section 19 (Adoptive Provision)

Provides Local Authority with the duty to ensure that the name of every street, which is maintained at public expense, is shown in a conspicuous position and also to alter or renew it if it becomes illegible. Anyone found guilty of damaging or removing a sign is liable to prosecution.

The Public Health Acts Amendment Act 1907

Section 21

The Local Authority may, with the consent of two-thirds in number and value of the ratepayers in any street, alter the name of such street- or any part of such street.

The Local Authority may cause the name of any street or of any part of any street to be painted or otherwise marked on a conspicuous part of any building or other erection.

Town Improvement Clauses Act 1847

Section 64

The Local Authority shall from time to time cause the houses and buildings in all or any of the streets to be marked with numbers as they think fit, and shall cause to be put up or painted on a conspicuous part of some house, building, or place, at or near each end, corner, or entrance of every such street, the name by which such street is to be known

Should any person destroy, deface or put up another number or name other than the official one, then that person shall be liable to prosecution in the Magistrates Court and the penalty of a fine under the provisions of Criminal Justice Act 1982 for every such offence

Section 65

The Occupiers of houses and other buildings in streets must mark their houses with such numbers as approved by the Local Authority, and shall renew such numbers as often as they become obliterated or defaced.

Where an occupier fails to do this in, within one week after notice for that purpose from the Local Authority, they shall be liable to a fine in the magistrates' court if it is decided to pursue them and the Local Authority shall cause such numbers to be marked or to be renewed, as the case may require. The expense thereof shall be repaid to them by such occupier, and shall be recoverable as damages.

Power to charge under Section 93 of the Local Government Act 2003

This provides power for best value **authorities**, as defined in the **Local Government Act 1999**, to charge for discretionary services. ... An **authority** may charge where the person who receives the service has agreed to its provision.

The Local Authority can charge for changing property names, changing street names and changing existing street numbering by virtue of section 64 and 65 of the 1847 Act coupled with section 93 of the 2003 Act.

APPENDIX C - Potential street name suffixes

Street names should ideally end with one of the following suffixes:

Street	(for any thoroughfare)
Road	(for any thoroughfare)
Way	(for major roads and pedestrian routes)
Avenue	(for residential roads)
Drive	(for residential roads)
Grove	(for residential roads)
Lane	(for residential roads)
Gardens	(for residential roads) subject to there being no confusion with any local open space
Place	(for residential roads)
Crescent	(for a crescent shaped road)
Court/Close	(for a cul-de-sac only)
Square	(for a square only)
Hill	(for a hillside road only)
Circus	(for a large roundabout)
Vale	(for residential roads)
Rise	(for residential roads)
Row	(for residential roads)
Wharf	(for residential roads)
Mews	(for residential roads)
Mead	(for residential roads)
Meadow	(for residential roads)
View	(for residential roads)

All new pedestrian ways should end with one of the following suffixes:

Walk
Path
Way

APPENDIX D – Complaints Process

Complaints directed to the team via email, letter or phone call will be dealt with by the relevant site.

If escalated or ongoing, they will be reviewed by the Team leader and may be passed onto the Authority Primary Contact for consideration in order to settle the issue.

Complaints received through the Councils standard complaints process will be dealt with by the relevant authority using their standard process.

APPENDIX E – Other relevant information

Who is Responsible for Delivery of Street Naming and Numbering?

The Street Naming and Numbering Team within Strata Service Solutions in consultation with Planning, Council Tax and the Development Control Committee.

Performance Monitoring

The Street Naming and Numbering Officers will pass all requests for new street names to the relevant Ward Councillors or Town or Parish Council. On receipt of their recommendation the process is normally completed within 30 working days.

All requests for property name changes will be dealt with in 10 working days.

The Local Authorities are not responsible for outside agencies updating their address databases.

Links related Policies/Strategies, Procedures and Legislation **The NLPG and LLPG**

The LLPG and NLPG will be updated to include all authorised new street names, building names and numbering. The LLPG and NLPG are maintained in accordance with British Standard BS7666 “Spatial Data-sets for geographical referencing”.

The LLPG and NLPG are growing in importance as increasingly these databases are being used by many government agencies, including the emergency services. Strata is in the process of integrating the LLPG with its other property based information systems. All changes to, or additions of, addresses will also be made in the LLPG. This information is then distributed internally within each Local Authority and passed to the NLPG for National distribution.

UK General Data Protection Regulation

We require your personal information to provide you with a Street Naming & Numbering service, and will use it to process your enquiry. All information that you provide to us will only be processed in line with the Data Protection Act 2018, the UK General Data Protection Regulation and any other applicable legislation. For further information on processing of data please see the website of the relevant Local Authority. We will retain applicant information (names/telephone numbers/email addresses) for 6 years.

Outcomes

A modern Street Naming and Numbering policy which is clear and easily understandable by our staff, developers and members of the public.

Appropriate involvement of all interested groups.

Address and street number systems which comply with the needs of the Royal Mail and emergency services.

Addresses entered and maintained in our systems in British Standard 7666 format.

Recoverable costs for house renaming and where developers seek to renumber and/or rename after their initial proposals have been dealt with.

Competitions/Public Consultation to name a street

The relevant Street Naming and Numbering Officer must be contacted by the proposer before proceeding.

The proposer will be responsible for:

- Contacting Ward Councillors for Exeter, or Town/Parish Councils for the Districts to confirm they are in agreement.
- For running the competition/consultation and collating the naming suggestions.
- Liaising with the relevant Ward Councillors/Town Parish Council's throughout the process.

The street naming and numbering guidelines set out in this policy should be taken into account when submitting the final suggested street names for consideration.

Policy Consultation

This policy has been written by the Street Naming and Numbering Team in consultation with Corporate Directors and Legal Services.

Equality Impact Considerations

Our policy has been written to be neutral towards all religious and ethnic groupings.

Policy Review

This policy will be reviewed every three years. Charges and standard correspondence will be reviewed on an annual basis by Strata Management and the Street Naming and Numbering Team.

Related Policies and Strategies

- Equality and Diversity Policy
- Customer First Policy

Contact information:

Exeter City Council

Email street.naming@exeter.gov.uk

Tel: 01392 265259

Links to online forms are under 'Residential and business address information' on this page:
<https://exeter.gov.uk/planning-services/>

East Devon District Council

Email snn@eastdevon.gov.uk

Tel: 01395 571723

Links to online forms are under 'Residential and business address information' on this page:
<https://exeter.gov.uk/planning-services/>

Teignbridge District Council

Email street.naming@teignbridge.gov.uk

Tel: 01626 215128

<https://www.teignbridge.gov.uk/planning/street-names-and-numbers/street-naming-and-numbering/>

Report to: Overview Committee

Date of Meeting 20.02.2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Proposed Wildlife Improvement Policy

Report summary:

StreetScene has been establishing Wildlife Improvement areas for several years to achieve the objectives of creating and improving space for nature, reducing emissions, and reversing species decline, to comply with relevant plans, strategies, policies, and legislations. The creation of Wildlife Improvement areas also supports the Council's Countryside department's targets to provide evidence for increases in habitat value by auditing green infrastructure, which is an important part of Countryside's Nature Recovery Declaration objectives: via Section 40 of the Natural Environment and Rural Communities Act (2006) duties for local authorities to conserve and enhance biodiversity.

The Council's Scrutiny Committee recommended to Cabinet on 13.06.2024 that the Wildlife Improvement strategy and its origins be reviewed, and for Cabinet to endorse StreetScene's approach and Wildlife Improvement practices; noting its contribution to the wider Nature Recovery work being led by the Council's Countryside department.

StreetScene proposed the Wildlife Improvement policy to ensure that the department's current and future Wildlife Improvement areas are managed, maintained, and improved to a high standard, whilst also supporting Countryside's role in meeting their new legislative targets.

The proposed policy will also help to increase residents' understanding of the gravity and the consequences of both climate change and biodiversity loss, and the urgency that mitigations to these crises need to be put in place and evidenced.

Is the proposed decision in accordance with:

Budget? Yes ☒ No ☐

Policy Framework? Yes ☒ No ☐

Recommendations:

- 1) That Overview recommends to Cabinet the adoption of the Wildlife Improvement policy as an official EDDC policy.
- 2) That Overview provides any other feedback on the proposed Wildlife Improvement policy.

Reason for recommendation:

The proposed Wildlife Improvement policy, if accepted, will formalise and underpin the important work achieved by StreetScene in the creation of Wildlife Improvement areas across the district. In addition, the Scrutiny Committee set out a number of recommendations for StreetScene in June 2024 and, in particular, recommendations numbered 1, 2 and 5, which shaped the developing Wildlife Improvement policy proposition. These recommendations can be seen via the 'Minutes on the Scrutiny Committee meeting on 13.06.2024' link on the following page.

Officer: Paul Fealey, Horticultural Technical Officer. Email: pfealey@eastdevon.gov.uk

Phone: 07976872884.

Portfolio(s) (check which apply):

- ☒ Climate Action and Emergency Response
- ☒ Coast, Country and Environment
- ☐ Council and Corporate Co-ordination
- ☒ Communications and Democracy
- ☐ Economy
- ☒ Finance and Assets
- ☒ Strategic Planning
- ☒ Sustainable Homes and Communities
- ☒ Culture, Leisure, Sport and Tourism

Equalities impact: Low Impact.

Climate change: Low Impact.

Risk: Low Risk. There are no risks relating to this report and the proposed Wildlife Improvement policy.

Links to background information:

Report presented to Scrutiny Committee on 13.06.2024:

<https://democracy.eastdevon.gov.uk/documents/s23976/130624%20Wildlife%20Improvement%20Scrutiny%20Report%20-%2028.5.24.pdf>

Agenda for the meeting on 13.06.2024:

[Agenda for Scrutiny Committee on Thursday, 13th June, 2024, 6.00 pm - East Devon](#)

Minutes on the Scrutiny Committee meeting on 13.06.2024:

[Printed minutes 13th-Jun-2024 18.00 Scrutiny Committee.pdf \(eastdevon.gov.uk\)](#)

Research on global biodiversity:

[UN Convention on Biological Diversity](#)

Evidence from UNEP about failed attempts to increase biodiversity goals:

[United Nations Environment Programme](#)

The Environment Act aims to restore natural habitats, increase biodiversity and halt the decline in species by 2030:

[Environment Act 2021 \(legislation.gov.uk\)](#)

A programme of action to reduce emissions year on year, and mitigate against the threats that climate change places on our communities:

[Council Strategy - East Devon](#)

The Action Plan sets out the priority actions for the Council to become Net Zero:

[Action Plan - East Devon](#)

StreetScene's latest Service Plan targets improving sustainable management of green spaces to help protect the environment, improve biodiversity and meet Climate Change Action Plan aims:

[streetscene-service-plan-2024-2025-final.pdf \(eastdevon.gov.uk\)](#)

Set up to support DCC as the Responsible Authority in developing a Devon Local Nature Recovery Strategy in EDDC's role as a Supporting Authority as defined by the Environment Act (2021):

[Nature Recovery Declaration for East Devon.pdf](#)

A Nature Recovery Network (NRN) is a joined-up system of places (habitats) important for wild plants and animals:

[Devon Nature Recovery Network - Devon Local Nature Partnership \(devonlnp.org.uk\)](https://devonlnp.org.uk)

In 2024, legislation was developed to halt biodiversity losses due to development:

[Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

This legislation places a duty on all public authorities to have regard, in the exercise of their functions, for the purpose of conserving biodiversity for the conservation and enhancement of biodiversity:

[Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)

This is the first revision (after 5 years) of the 25-year Environment Plan, which now has biodiversity as its top priority:

[Environmental Improvement Plan \(publishing.service.gov.uk\).](https://publishing.service.gov.uk)

A new global compact to effectively protect and manage at least 30% of land, waters and sea for nature, known as 30x30, is just one of 23 global targets that were agreed in 2022 as part of the Global Biodiversity Framework:

[Link_30x30_Progress_Report_2024.pdf \(wcl.org.uk\)](https://wcl.org.uk)

A comprehensive and alarming report on state of the UK's nature, which everyone in the country should read:

[State of Nature 2023 - report on the UK's current biodiversity](#)

Link to: [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community.
 - ☒ Carbon neutrality and ecological recovery.
 - ☒ Resilient economy that supports local business.
 - ☒ Financially secure and improving quality of services.
-

Report in full:

Introduction and background

The UK is one of the most nature-depleted countries on earth, with the highest biodiversity losses in Europe. Since the 1970s, over 40% of UK animal species have declined, and over 25% of all UK mammals face extinction. Biodiversity has been lost by centuries of pollution, unsustainable farming, development, the use of pesticides, and a lack of awareness of the long-term damage that we have caused; all of which have led to substantial habitat losses. At the same time, climate change is affecting biodiversity due to changing weather patterns; variations in rainfall; extreme weather events; the sensitivity of habitats to climate change; life cycle changes due to warmer springs that cause mistiming/mismatches; the introduction of non-native pests and diseases that plants have no defences against; and native species moving to higher latitudes and altitudes to be cooler.

The Council has declared both climate and nature emergencies. Land management strategies that create protected habitats increase the likelihood that important species and habitats will endure and expand their range under climate change conditions. StreetScene has been committed with helping to mitigate climate change and the loss of a diverse range of flora and fauna by targeting biodiversity increases through the transition of suitable amenity green spaces to Wildlife Improvement areas.

StreetScene first transitioned amenity green spaces away from intensive grounds maintenance in 2010 to reduce carbon emissions from maintenance equipment and to improve biodiversity. The

number of these green spaces increased after the Council declared a Climate Emergency in 2019, followed shortly after by a Nature Emergency, which manifested targets into an informal strategy to manage green spaces to improve wildlife, whilst balancing amenity access, use and enjoyment.

Strategic changes to current practices

The number of Wildlife Improvement areas across the district remains low when compared with the number of regularly managed green spaces, notwithstanding plans, policies, strategies, and legislations that compel StreetScene to continue the former pace of the creation of Wildlife Improvement areas. However, continuing to add more Wildlife Improvement areas without addressing outstanding issues will create or exacerbate an imbalance for residents. The decision was therefore made by StreetScene management in 2024 that current Wildlife Improvement areas need to be better managed, maintained and monitored by grounds teams, contractors, volunteers, and Officers before other regularly maintained amenity green spaces, or sections therein, can be considered for transition to Wildlife Improvement. This will remain in place until a formal Wildlife Improvement policy provides an inclusive bridge between the district's residents and amenity green spaces that are designated for nature, and inclusive consultations with residents are coordinated by StreetScene's Parks and Gardens Officers (a two-Officer team made up of the Horticultural Technical Officer and the Parks and Open Spaces Improvement Officer) to understand residents' feelings about proposals, alongside their appreciation of the dual nature and climate crises. At such a time in the future, other sections of green spaces will be assessed and proposed for designation to Wildlife Improvement, in line with a formal policy to guide and oversee changes. To do this, ongoing consultations will be designed and implemented that assess residents' feelings about Wildlife Improvement at each stage, which will gauge the incremental successes of the long-term Communications strategy that is in development, as well as StreetScene's Parks and Gardens Officers' efforts to make Wildlife Improvement areas less dominated by grasses, more attractive (to residents, as much as to pollinators and associated fauna), and more engaging and educational.

Addressing residents' misconceptions

A formal Wildlife Improvement Policy will help to address and redress many of East Devon's residents' expectations of Wildlife Improvement areas by inclusively engaging, informing, and educating them as to the reasoning for the creation and management of Wildlife Improvement areas. The implementation of a formal Wildlife Improvement policy will also help with residents' understanding of both the gravity of the situation and the urgency that changes must be made that protect our nature, our communities, and our future.

Implementing the above with combined strategies on the ground, in line with a formal policy, will help to systematically transform misconceptions about the Council's and StreetScene's intentions for establishing Wildlife Improvement areas, e.g., away from the conviction that Wildlife Improvement designations are a thinly veiled disguise for the Council to save money by reducing grounds maintenance.

The proposed Wildlife Improvement policy sets out ways to inform residents of the time and efforts involved in managing and maintaining Wildlife Improvement areas, such as the logistics of seasonally cutting, collecting, bailing and removing green waste from sites; grounds teams' efforts to scarify areas to reduce grass dominance and increase wildflower proportionality; Parks and Gardens Officers' sowing of wildflowers, including higher concentrations of yellow rattle; designing and installing signage for resident and visitor engagement; the mowing and strimming of boundary areas and paths through Wildlife Improvement areas by grounds teams; and Parks and Gardens Officers working with community groups and Countryside's Ecology Officers to survey and monitor the increasing diversity of flora and fauna in those areas, which Countryside can use to assist their habitat mapping and quantifying, to provide evidence of ongoing positive changes to habitat values.

Developing a Communications strategy

A long-term Communications strategy is in development between Parks and Gardens Officers and the Council's Communications team, which is due to start engaging, informing, and educating

residents in numerous ways from the start of the growing season 2025. At the same time, a suite of new, more inclusive signage is being developed with Strata's Graphic Designer, with plans to install and promote the new signs at the start of the 2025 growing season.

The long-term Communications strategy aims to:

- embed the value of Wildlife Improvement areas in discerning residents.
- provide opportunities for other residents to help them to re-evaluate their reservations.
- increase the general levels of awareness of residents to enable them to develop informed attitudes towards and about Wildlife Improvement.
- encourage residents' further research into climate change mitigation, nature recovery, habitat improvement, and methods of increasing biodiversity.

The development of a communications strategy fits in with the ethos of the Council Plan 2024–2028, to *'...strengthen the ways in which we engage with you – our residents, businesses, visitors, and communities. We will do this by communicating openly and honestly, listening to your views, and developing new ways to work in partnership to improve our district.'*

Policy implementation

Programmes of work will be developed to implement the proposed Wildlife Improvement policy, if adopted as a formal policy, and regularly reviewed and updated to improve practices. To do so, Wildlife Improvement areas will be visited during the year by Parks and Gardens Officers to assess how well maintenance activities are carried out by grounds teams, such as how well and how often boundary and through-paths are mown, and how appropriate this is for the look of amenity green spaces surrounding Wildlife Improvement areas, and how well residents can access, use and enjoy those green spaces. Management and maintenance plans will be revised to include changing characteristics and numbers of Wildlife Improvement areas to conform with StreetScene's biodiversity and climate change targets. These areas will be developed in line with collaboration with the Council's Communications team to create a clearly defined Communications strategy in multiple inclusive formats to increase residents' information for wider influence.

In addition, new and innovative management methods and maintenance equipment will be assessed/trialled with the aim of applying them to the future management and maintenance of StreetScene's Wildlife Improvement areas.

A formally adopted Wildlife Improvement policy will mandate the positive steps outline above, which are required initially and through each successive policy revision.

Financial implications:

"There are no direct financial implications resulting from the report."

Legal implications:

"There are no substantive legal issues to be added to this report (ALW/002512/6/2/25)."

Wildlife Improvement Policy – StreetScene-managed land. East Devon District Council.

1. Why has the Council introduced this policy?

1.1 Introduction

1.1.1 StreetScene is the service arm of East Devon District Council ('the Council'), which has responsibility for the maintenance of most of the Council's urban parks, gardens, open spaces, sports pitches, commons, and cemeteries. Green spaces that are not covered by this policy are those under the remit of the Council's Countryside department; those owned by Devon County Council, which includes highways and grass verges, which are often mistaken for Council land by residents; those owned by Town/Parish Councils; those owned by the Council and managed by StreetScene but are regularly maintained amenity areas; and sports areas.

1.2 The Global Nature Emergency

1.2.1 Intensive management of green spaces has contributed to the global nature emergency, which has led to the recognition that the Council's public green spaces are as much for the benefit of our endangered wildlife communities as they are for our communities of residents; with mutual benefit being gained from coexistence. It is therefore important to sensitively manage green spaces to balance amenity access/use with developing habitats for wildlife.

1.3 The Impact of Traditional Grounds Maintenance

1.3.1 The maintenance of amenity green spaces causes greenhouse gas emissions from hand-held, pedestrian-controlled, and ride-on equipment, which contributes to climate change. As an example, a typical diesel-powered ride-on mower releases more than 2.5kg of carbon for every litre of fuel burnt to maintain green spaces. Reducing regular mowing and strimming by creating Wildlife Improvement areas therefore results in fewer climate-changing emissions released. Most green spaces, however, must be maintained regularly for community access, use, enjoyment, well-being and health. StreetScene's grounds teams do not collect arisings from these regularly maintained amenity green spaces across the district whilst mowing due to the vast volumes of green waste/arisings – weighing an estimated 200,000kg per month – making collection unrealistic.

1.3.2 The arisings deposited on grass swards across amenity green spaces reduces biodiversity levels because of the intolerable conditions created for flora underneath, and nutrient enrichment of the soil as the arisings decompose and feed the ground between each maintenance visit enables grass growth to outcompete almost all other plant growth, leaving only a few grass species tolerating the conditions and proliferating in green spaces that have been intensively managed for a long time. This is why grasses continue to dominate Wildlife Improvement areas for several years after being converted from traditional maintenance. Low biodiversity levels in new Wildlife Improvement areas takes time and effort to rectify, as soil nutrient levels are depleted by the new management regime to allow wildflowers the opportunity to develop. In the meantime, however, the transitioned green spaces that are dominated by grasses are contentious for many residents due to the contrast between how the green space once looked – which residents often refer to as 'tidy' – and how they look when they are transitioned, when 'untidy' grasses dominate.

1.4 The UK's Nature Emergency

1.4.1 Wildlife Improvement areas are very much required because the UK is one of the most nature-depleted countries on earth, with the highest biodiversity losses in Europe. Since the 1970s, over 40% of UK animal species have declined, and over 25% of all UK mammals face extinction. Biodiversity has been depleted by centuries of pollution, unsustainable farming, development, the use of pesticides, and intensive maintenance; all of which have led to substantial habitat losses.

1.5 Devon's Nature Emergency

1.5.1 Devon supports a wide range of species and habitats that are internationally important, and there are species of global significance, such as the dormouse and the greater horseshoe bat, but these are under threat due to climate change, invasive species, pollution, development, and a lack of protection. The Devon Local Nature Partnership states: *'We have seen huge losses of wildlife across Devon. Our remaining habitats are largely disconnected from each other and are small and often in poor condition. We all need to take urgent action to create, enhance, expand, and connect wildlife habitats across the county.'* These stark facts are contrary to the feelings of many of the district's residents, which is helped by there being a lot of wild landscapes, countryside, and Areas of Outstanding Natural Beauty across the district, which seemingly support extensive biodiversity. Unfortunately, this is not the case, and this misconception supports residents and some Councillors to reason against traditionally maintained green spaces, or sections therein, being designated as Wildlife Improvement areas in urban and suburban areas across the district.

1.6 StreetScene's Environmental Responsibilities

1.6.1 To combat this ever-escalating situation, the UK government published its 25-year **Environment Plan** in 2018, with subsequent revisions due every 5 years of the Plan's life to keep up to date with changes. A recent revision, titled **The Environmental Improvement Plan** (2023) has the *'...long-term protection and favourable management needed for biodiversity to thrive'* as its principal priority – rising from the third priority in 2018. The government committed to protect 30% of England's land and sea by 2030 – but with 5 years remaining (to date), there is still less than 3% protected. Urgent action is needed to prevent a biodiversity collapse. The Council adopted a **Nature Recovery Declaration** in September 2023, signalling its intention to embed Nature Recovery/Wildlife Improvement in all its strategic Council plans and policy areas.

1.7 StreetScene's Targets

1.7.1 StreetScene is targeted with helping to reverse these life-threatening statistics by improving biodiversity and mitigating climate change through the transition of suitable amenity green spaces, or sections therein, to Wildlife Improvement. The target focuses on complying with nature recovery legislation by creating space for nature, reducing emissions, and taking action to reverse species decline, such as by developing Wildlife Improvement areas and monitoring biodiversity levels. This work fits in with the broader objectives and wider scope of the **Nature Recovery Declaration** and the enhanced Section 40 of the **Natural Environment and Rural Communities Act** (NERC), which places duties on local authorities to conserve and enhance biodiversity. It also feeds into the Council's Supporting Authority duties in the **Local Nature Recovery Strategy** (LNRS) work, led by the Council's Countryside department. The 'urban fabric' of which these policy areas will enhance form part of the Council's Local Habitats Map and Local Nature Recovery Plan for East Devon. StreetScene is targeted to assist Countryside's legislated duties by conducting a range of Wildlife Improvement activities on StreetScene-managed land to increase biodiversity and pass on

monitoring evidence. The success of this Wildlife Improvement policy will be based, in part, by these collaborations to help Countryside to quantify and map habitats on StreetScene-managed land to develop a Local Nature Recovery Plan for East Devon.

1.8 The Introduction of Wildlife Improvement Areas

1.8.1 StreetScene first transitioned several amenity green spaces away from intensive grounds maintenance in 2010 to reduce carbon emissions from maintenance equipment and to improve biodiversity. The number of these green spaces increased after the Council declared a Climate Emergency in 2019, followed shortly after by a Nature Emergency, which targeted green spaces to improve wildlife, whilst balancing amenity uses.

1.9 Enhanced Duties on Local Authorities

1.9.1 **The Environment Act** (2021) places an important duty on local authorities to ‘...*conserve and enhance biodiversity, and report on their actions*’, through modification of Section 40 of the **Natural Environment and Rural Communities Act** (NERC, 2006), which fits in with StreetScene’s history of developing Wildlife Improvement areas. Under The Environment Act (2021). Devon County Council (DCC) is a Responsible Authority (RA) to develop the county’s legislated **Local Nature Recovery Strategy** (LNRS), and EDDC is a Supporting Authority (SA) in the process and must have regard for the LNRS, once formally adopted. The Council’s Countryside department supports DCC in the development of a LNRS, and StreetScene is targeted to support Countryside by developing Wildlife Improvement areas and surveying biodiversity increases, to quantify habitats, which helps to meet EDDCs enhanced biodiversity and SA duties imposed by the Act.

1.9.2 StreetScene is compelled to develop and manage Wildlife Improvement areas by the following:

1.9.3 The Environment Act (2021) ‘*Through the Act, we will restore natural habitats, increase biodiversity and halt the decline in species by 2030. It is imperative that we step up action to boost nature recovery if we are to tackle the twin challenges of biodiversity loss and climate change.*’

1.9.4 Natural Environment and Rural Communities Act (2006) Section 40 ‘*Places a duty on all public authorities...to have regard, in the exercise of their functions, for the purpose of conserving biodiversity... for the conservation and enhancement of biodiversity.*’

1.9.5 EDDC’s Council Plan 2024-2028, Priority Two: A sustainable environment that is moving towards carbon neutrality and which promotes ecological recovery. ‘*Our wide-ranging approach focuses on climate action... sustainable development and habitat preservation.*’

1.9.6 StreetScene Service Plan 2024/25 ‘*Improve our sustainable management of green spaces*’ to ‘*help protect the environment, improve biodiversity, linked nature recovery areas, and meet Climate Change Action Plan aims.*’

1.9.7 Nature Recovery Declaration for East Devon ‘*We have both Climate and Biodiversity crises, and currently the United Kingdom is within the bottom 10% of countries globally and also the worst G7 nation for biodiversity loss.*’

1.9.8 Biodiversity Net Gain (2024) *'It is a way of creating and improving natural habitats. Created and enhanced habitats will be secured for a minimum of 30 years.'*

1.9.9 East Devon District Council Climate Change Strategy 2020 – 2025 *'Improve the quality and connectivity of natural habitats, promote nature recovery corridors and use green spaces for carbon offsetting.'*

1.9.10 East Devon District Council Climate Change Action Plan 2020 – 2040 *'Ensure that we address biodiversity and environmental issues as part of our climate change response.'*

2. What is the Council's policy?

2.1 Definition of a Wildlife Improvement Area

2.1.1 Wildlife Improvement areas are defined as StreetScene-managed amenity green spaces where maintenance regimes are minimised throughout the growing season to help nature and wildlife to recover.

2.2 Assessing and Establishing New Wildlife Improvement Areas

2.2.1 StreetScene-managed amenity green spaces will be assessed for potential transitions to Wildlife Improvement areas. This will be based on latest Census data to fully consider residents' protected characteristics and how these relate to green spaces' access and use. Other data will include online imaging, observations of community/visitor use and, when appropriate, questionnaires. These assessments will increase awareness of how/why communities use these green spaces. Potential Wildlife Improvement areas will then be selected for public consultations to gain wider perspectives. This will facilitate inclusive assessments to prevent negatively impacting upon residents' characteristics, such as those who potentially have a greater reliance on traditionally managed green spaces.

2.2.2 Green space assessments will consider the following:

- carrying out/recording Equality Impact Assessments and risk assessments.
- residents' access and the potential impacts on residents with limited mobility.
- the distance away from roads, verges, and pavements to keep these areas clear for access and visibility, such as sight lines.
- street furniture adjacent to the area.
- location of underground services.
- local biodiversity levels; designations/byelaws.
- the suitability of a green space for ongoing regular maintenance, e.g., steep banks/under trees, where maintenance can be difficult, hazardous, and damaging.
- the proximity of/to other amenity green spaces for community enjoyment.
- how much of a green space to transition without impacting community use.
- the impact on adjoining areas that are not traditionally maintained.
- factors affecting seasonal management, such as access, gradient, environmental considerations, financial implications, and the logistics of waste disposal.
- potential connectivity between green spaces.
- the potential of anti-social behaviour on a transition.

2.3 Balancing Community Access and Use with Space for Nature

2.3.1 In all scenarios, StreetScene is seeking to balance different uses of its green spaces whilst maintaining space for communities alongside areas set aside for nature. We are not, for example, suggesting that an important amenity or recreation green space is lost to Wildlife Improvement; rather that boundaries or margins can be enhanced through the creation of these areas.

2.3.2 The health and safety of residents, along with the community's needs, will take priority when assessing green spaces for transition potential. A minimum of a 1.5m strip of amenity grass will be maintained between Wildlife Improvement areas and pavements/roads that are managed by DCC Highways department. Mown boundary areas add to the appearance of an area, provide cues to intentions and care, and prevent the improbable event of a fire extending beyond a Wildlife Improvement area.

2.4 No-Mow Zones Under Tree Canopies

2.4.1 Grass/wildflowers will be allowed to grow under the canopies of mature trees. This reduced mowing—helps protect tree roots from compaction, limits disturbance to wildlife and avoids damage from equipment, such as to low-hanging branches. Canopy damage and root compaction can affect trees' health and security. This practice will also be carried out in many regularly maintained green spaces.

2.5 Communications and Signage

2.5.1 Wildlife Improvement communications and signage will be designed and used in collaboration with the Council's Communications team. Signage will be designed to inform, engage, and educate residents and visitors as to areas' importance, whilst raising awareness of issues, such as the impacts of trampling/dog fouling. Communications will be as inclusive as possible and consider the Equality Impact Assessment created for this work. Communications will include social media posts, residents' updates, articles in local newspapers, Councillors' updates, circulars, tenants' magazines, interpretation boards, the Council's website and apps, Town/Parish Council communications, and press releases. Signage will be installed in Wildlife Improvement areas' and will be monitored and replaced/kept up to date through the season, and retrieved before sites are cut and collected each Autumn.

2.6 Protecting Wildlife Improvement Areas

2.6.1 The Council's Environmental Health department will be consulted with, when appropriate, to propose public consultations in specific Wildlife Improvement areas as Byelaw-enforced zones for dogs to be kept on leads, when dog fouling away from accessible pathways through Wildlife Improvement areas impacts upon habitats and public health. Dog owners often have difficulty finding fouling when they are some distance away during fouling, such as when dogs are allowed to run free in these important habitat areas. Dog owners' attempts to then find foulings can cause further damage to these habitats due to the sensitivity of a lot of flora and fauna to disturbance. For example, the critically endangered ground-nesting curlews that are being encouraged by sensitive green space management will not return to their nests when disturbed by dogs and/or people. To highlight just this one issue, Devon has tragically lost 85% of its curlews since 1985. Although the vast majority of residents/dog owners are responsible, minimising damage to Wildlife Improvement areas by trampling and fouling is crucial for the protection of nature in our Wildlife Improvement areas, which will take the forms of signage; public communications to inform, engage, and educate residents; and enforcement on the ground to challenge and redress irresponsible behaviour,

which predominantly occurs as a result of an unawareness of the relationship between behaviour and damage.

2.7 Management and Maintenance of Wildlife Improvement areas

2.7.1 Wildlife Improvement areas will not be mown throughout the growing season to prevent damage to wildlife habitats, other than pathways through areas to maintain access, but this will be determined on case-by-case basis. The sites will be cut and collected in Autumn (ideally September to October as timings are dependent on weather, ground conditions and extent of flowering). There may be a 2-week gap between cutting and then collection to allow seeds to drop and for insects to migrate from the collection areas. Arisings will be collected and removed to prevent their decomposition. Some sites may not receive an annual cut for practical reasons, i.e., access issues or staggered cutting and collection to allow some sections to be left uncut each year to leave alternating areas for nature. Other sites will not cut at all, and left to grow and establish into wildlife havens, such as in inaccessible areas. These are the exception but need to be noted within this policy.

2.7.2 StreetScene is targeted to challenge and mitigate climate change and biodiversity losses by a wide range of legislations, policies, plans, and strategies. Seasonal maintenance – the cutting, collecting, and removing of green waste from a site – of Wildlife Improvement areas is necessary to prevent the breakdown of organic matter nutrifying soils. Soil nutrification in this way is of benefit to grasses, but at the detriment of wildflowers. Grasses that can access soil nutrients from decomposing organic matter that has not been removed from a site are able to outcompete and smother wildflowers. The removal of arisings from accessible Wildlife Improvement areas each autumn across the district since 2019 has resulted in grasses becoming less dominant, which has created space for wildflowers for grow – attracting a range of insect pollinators and wildlife up the food chain.

2.8 Seasonal Maintenance of Wildlife Improvement Areas

The following seasonal maintenance criteria must be followed to ensure Wildlife Improvement areas maintain biodiversity levels to encourage wildlife, reverse biodiversity losses and mitigate climate change:

- timing of cutting and collection to be later than when wildflowers set seed, but earlier than when the ground conditions become too wet for equipment to access.
- when prolonged rains from early in Autumn prevents sites from being cut and collected, they will be cut and collected between Autumn and early the following Spring to enable good propagation of wildflower seed, to reduce nutrients, and to suppress grass growth/improve wildflowers.
- smaller/less accessible areas will be cut and collected by grounds teams in Autumn.
- for the few sites that cannot be accessed by grounds teams with large equipment, their Autumn work on those sites will require strimming and raking the arisings, with help from other grounds teams and/or volunteers, when necessary.
- wildlife Improvement areas cannot be left without a seasonal clearance and collection or arisings due to how crucial it is to break nutrient cycling habitat value.
- some sections within Wildlife Improvement areas will not be cut and collected each year due to specific characteristics that pose hazards to grounds teams.

2.9 Policy Implementation

2.9.1 Underpinning and ongoing programmes of work will be developed for wildlife improvement areas to implement this policy, and to review, update and improve practices. To do so, Wildlife Improvement areas will be visited during the year to assess how well maintenance activities are conducted by grounds teams, such as how well and how often boundary and through-paths are mown, and how appropriate this is for residents' access and use of the green space. Management and maintenance plans will be revised with the characteristics/number of Wildlife Improvement areas, to conform with StreetScene's biodiversity and climate change targets. In addition, new and innovative management methods/equipment will be reviewed with the aim of applying them to the future management and maintenance of Wildlife Improvement areas.

2.10 Policy Evaluation

2.10.1 On a smaller scale, the successes of this policy will be based on the results from surveying and monitoring flora and fauna in Wildlife Improvement areas, and comparing biodiversity levels with those that exist in adjacent, regularly mown areas, which will evidence biodiversity changes as a direct result of Wildlife Improvement strategies and practices.

2.10.2 On a wider scale, with biodiversity evidence presented to Countryside for specific areas, successes will be based on Countryside's habitat mapping of StreetScene-managed land and a future (to date) Local Nature Recovery Plan for East Devon. At a local level, successes will be determined by Wildlife Improvement areas that:

- are less dominated by grasses.
- are more colourful and biodiverse.
- are more engaging, informative, and educational.
- are managed and maintained in the proposed ways.
- aid duties to a level that befits StreetScene's responsibilities.

3. Policy Administration

3.1 Links Related to Policies, Strategies, Plans and Legislations

3.1.1 [Environment Act 2021 \(legislation.gov.uk\)](https://legislation.gov.uk)

3.1.2 [Council Strategy - East Devon](#)

3.1.3 [Action Plan - East Devon](#)

3.1.4 [Service Plan objectives for 2021-22 v2 003 JA.pdf \(eastdevon.gov.uk\)](#)

3.1.5 [120122 Streetscene key service objectives for 2022-23.pdf \(eastdevon.gov.uk\)](#)

3.1.6 [Streetscene-service-plan-2024-2025-final.pdf \(eastdevon.gov.uk\)](#)

3.1.7 [Nature Recovery Declaration for East Devon.pdf](#)

3.1.8 [Agenda for Scrutiny Committee on Thursday, 5th October, 2023, 6.00 pm - East Devon](#)

3.1.9 [Devon Nature Recovery Network - Devon Local Nature Partnership \(devonlnp.org.uk\)](https://devonlnp.org.uk)

3.1.10 [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

3.1.11 [Council Plan](#)

3.1.12 [UN Convention on Biological Diversity](#)

3.1.13 [United Nations Environment Programme](#)

3.1.14 [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)

3.1.15 [Environmental Improvement Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk).

3.1.16 [Agenda for Scrutiny Committee on Thursday, 13th June, 2024, 6.00 pm - East Devon](#)

3.1.17 [Link 30x30 Progress Report 2024.pdf \(wcl.org.uk\)](#)

3.1.18 [State of Nature 2023 - report on the UK's current biodiversity](#)

3.1.19 [Discrimination: your rights: Types of discrimination \('protected characteristics'\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

3.2 Data Protection

3.2.1 All personal data is kept in accordance with legislation and Council policy. [Data Protection Policy - East Devon](#).

3.3 Policy Consultation

3.3.1 The proposed policy relates to several Scrutiny Committee recommendations to Cabinet on 13.06.2024.

3.3.2 ELT will review the proposed Wildlife Improvement policy. Date of approval: TBC (to be updated post-review).

3.4 Policy Review

3.4.1 StreetScene's Operations Manager is responsible for control of this policy and for initiating any briefings or training following subsequent revisions.

3.4.2 This policy will be regularly reviewed to incorporate changes to the management and maintenance of Wildlife Improvement areas based on the implementation of improvements supported by responses via consultations with grounds teams, residents, town/parish councils and councillors. Reviews will also discourage negatively impacting East Devon's residents, as communities transform, to evaluate and integrate residents' characteristics, as part of a re-evaluated Equality Impact Assessment. This will foster good community relations and comply with the Public Sector Equality Duty.

3.4.3 The first policy review date is scheduled for 02/2027.

Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes and other resources, available on the [intranet](#)



Version	1	Date Completed	23/01/2025
Description of what is being impact assessed			
East Devon's residents' potential discrimination and/or disadvantage as a result of the proposed Wildlife Improvement policy and the associated implementation of practices in their maintenance and management.			
Evidence			
What data/information have you used to assess how this policy/service might impact on protected groups?			
<p><i>Further information is available at Equality data.</i></p> <p>StreetScene's Horticultural Technical Officer has regularly reviewed the 2021 Census data for East Devon's residents as a whole since its publication, including the number and proportional representation of residents with protected characteristics. These data were then 'drilled into' to further review residents' protected characteristics in wards where Wildlife Improvement areas are located.</p> <p>These in-depth enquiries across the district informed the Officer about residents with represented and under-represented protected characteristics, which determined how Wildlife Improvement areas in each of those wards have the potential to impact residents possessing those characteristics; with the understanding, however, that any not all potentially negative impacts to residents being deemed to be unlawfully discriminative. This helped the Officer to fully consider how Wildlife Improvement areas, and the proposed policy that is intended to govern them and their management have the potential to be less safe and less accessible for such residents than traditionally managed green spaces managed by StreetScene.</p> <p>Public consultations were designed to meet the needs of the spectrum of residents who use these green spaces, and proposals to develop some Wildlife Improvement areas were abandoned after some public consultations, due to feedback from residents. However, it must be noted here that potentially impacting residents negatively on a more subjective, shorter-term basis on a micro scale by</p>			

developing Wildlife Improvement areas must be weighed against strategies that protect people from the objective dangers of climate change and continued biodiversity losses not being introduced during our climate and biodiversity crises on macro scales.

A summary document called 'East Devon Community Profile 2024' has been created by EDDC's Communications department, and was also used to assess how the Wildlife Improvement policy and its associated actions on the ground may impact residents' protected characteristics, to understand and take account of proportional variances in these characteristics.

The wards currently containing Wildlife Improvement areas are: Brixington, Littleham, Withycombe Raleigh, Halsdon, Sidford, Sidmouth Town, Seaton, Axminster, St Paul's, St Michael's, Budleigh Salterton, Colyton, Gittisham, Musbury, Woodbury, and Newton Poppleford & Harpford.

It is important to note, when referring to residents potentially being negatively impacted by Wildlife Improvement areas, that some negative impacts to residents resulting from transitioning traditionally maintained green spaces into Wildlife Improvement areas may exist, such as objections to Wildlife Improvement areas based on residents' objecting to how untidy they may feel those areas look when compared with the former stringent mowing regimes that helped to cause the biodiversity crisis we find ourselves in, where the UK has the highest biodiversity losses in Europe, and one of the highest in the world.

When any potential negative impacts lead to potential unlawful discrimination, efforts will be taken to mitigate or eradicate them, which is why subjectively negative impacts will not be considered as part of this Equality Impact Assessment. Instead, residents still holding these obsolete, micro-scale views will be targeted by engagement strategies that refer more to the macro scale of the endemic dangers we all face by climate change and biodiversity losses.

Who have you consulted with to assess possible impact on protected groups and what have they told you? If you have not consulted other people, please explain why?

There have not been specific consultations to exclusively gain insights about residents' protected characteristics across the district, but the equality and diversity monitoring forms attached to previous public consultations regarding Wildlife Improvement creation proposals captured residents' views/comments in association with their E&D/protected characteristics.

This Equality Impact Assessment has been shared with StreetScene's Operations Manager and Assistant Director, Countryside's Assistant Director, the Portfolio Holder for Coast, Country and Environment, and EDDC's Equalities lead. Their feedback was invaluable in the creation of this EqIA.

There are intentions for future Equality Impact Assessments as part of Wildlife Improvement policy reviews, if the policy is made formal, and wider consultations with help to further understand residents' protected characteristics in each area where a Wildlife Improvement area is located.

Analysis of impact on protected groups				
<p>The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. The Council also has a legal duty to have due regard to armed forces personnel when carrying out healthcare, housing and education functions. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, assess the likely outcome, before you have implemented any mitigation.</p>				
Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	<p>To prevent potential unlawful discrimination against residents based on their age, the Horticultural Technical Officer and the proposed Wildlife Improvement policy ensure that Wildlife Improvement areas are/will be located in areas to avoid impeding residents' access, and are located away from pavement areas, grass verges and near to street furniture. This fits in with the Devon Countryside Access Forum's point about green spaces not having to be fully accessible to provide health and well-being benefits to residents.</p> <p>Due to grounds teams regularly mowing the perimeters of Wildlife Improvement areas and, when appropriate for the location's characteristics, maintain pathways through Wildlife Improvement areas, residents are assessed as not being disadvantaged by these green spaces and, more importantly, are able to experience and be surrounded by these rare urban green spaces that encourage nature and wildlife, to positively impact their physical and mental health. Additionally, the installation of high-visibility and easy to read/interpret signage in priority areas inform, engage and educate residents as to the intentions of the green spaces, e.g., to attract much-needed wildlife into urban areas and to minimise environmental damage by dramatically reducing emissions from maintenance equipment.</p> <p>It can be seen from the 2021 UK Census data that East Devon has a much higher proportion of residents that are categorised into the higher end of this protected characteristic than the UK average, with all age categories in East Devon from '50-</p>	□	☒	□

	<p>54' being above the UK average, culminating in the '85 and over' age category being almost double the UK average, and the '70-74' age category being 50% more than the UK average. As a result, all age categories from birth to '45-49' are lower than the UK average for East Devon as a whole. This heavily skewed population structure towards the higher age categories means that a high proportion of older, non-economically active residents use StreetScene-managed green spaces across the district, and unlawful discrimination caused by negative impacts to residents in this characteristic by the actions of the policy and the implementation of strategies to manage and maintain these green spaces has been considered in depth.</p> <p>It would be discriminatory to associate residents' ages/age categories with their capacity to access, use and enjoy a green space. However, there exists the potential for a disproportionate impact on those who share the higher brackets of this protected characteristic, as opposed to those who do not, especially when increasing age is often linked with – but not exclusive to – declining health and/or disability. With regards to East Devon's residents as a whole (Census, 2021), those who identify as having 'poor health' and 'very poor health' are shown to be proportionally lower than the UK average, despite the high proportion of older residents, whilst residents who identify as being 'disabled under the Equality Act' are proportionally slightly higher than the UK average. The speculative implication is for residents with pre-existing disabilities living healthier lives in healthier communities than the UK average.</p> <p>Consideration has been given to the impacts of proposed changes to green spaces for elderly residents and whether changes will cause unlawful discrimination or disadvantage. When assessing traditionally maintained green spaces for transition to Wildlife Improvement areas, specific latest Census data have been considered for likely impacts to residents living in each of the 16 wards containing Wildlife Improvement areas, to build up an image of local demographics of green space users. Feedback from public consultations, in association with respondents' E&D data, help to strengthen considerations of protected characteristics.</p> <p>An example of a ward with a heavily skewed population structure towards upper age categories, the latest Census data for Budleigh Salterton, where there are 2 Wildlife Improvement areas, shows that residents there who identify by the age category as '85 and over' represent almost 3.5 times the UK average, and residents who identify</p>			
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	<p>as '75-79' are more than 2.5 times the UK average. As a consequence, the number of 'older' people potentially using relevant green spaces is very high, whilst children/young people potentially using green spaces in the ward is potentially very low. This fits in with Officer experiences in the ward's green spaces. Despite this skew, residents' safe access of Wildlife Improvement areas is at a high level due to these areas being located peripherally within the green spaces, and away from pavement areas and hard standing pathways. For residents who do choose to leave hard standing areas to experience Wildlife Improvement areas more, pathways are mown through them (when appropriate to their characteristics) and around them for residents' access and enjoyment. Consultations prior to Wildlife Improvement transitions are important across the district – but are essential in a ward such as Budleigh Salterton, where feedback from residents can help to locate/shape Wildlife Improvement areas. The public consultations for the 2 Wildlife Improvement areas in this ward involved using Budleigh Salterton Town Council to promote the proposed plans to the public on their noticeboard, on their website and at Council meetings, which enabled the consultations to be more inclusive to the high proportion of 'older' residents. Subsequent feedback helped Officers to make minor changes to proposed areas.</p> <p>Another example of skewed Census data for a specific ward in East Devon is that for Woodbury, where the age group '16-20' is presented as twice the UK average. Discrepancies such as these for specific wards could not be considered and mitigated without reference to reliable data sources.</p> <p>In April 2024, StreetScene's Horticultural Technical Officer worked in conjunction with EDDC's Comms team and Sidmouth Town Council to inform, engage and educate older residents across the district but also in/around Sidmouth. A joint press release was written about the benefits of Wildlife Improvement areas, with an emphasis on addressing the views of many older residents that mowing green spaces to prevent them from looking untidy is more important than trying to mitigate climate change and increase biodiversity. This press release was published on several District and Town Council and media sites, as well as in local newspapers that have a dedicated 'older resident' following. Feedback from Sidmouth Town Council, based on feedback they received from older residents as a result of the press release, was very positive.</p>			
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	<p>Possibly as a result of this, complaints about the subjective untidiness of Wildlife Improvement areas were a lot fewer in 2024.</p> <p>The 2025 Wildlife Improvement Communications Strategy that is currently (January 2025) being planned aims to help engage young people by targeting social media platforms that are used predominantly by young people, such as TikTok, and by making content/communications engaging, to connect young people with topics and causes they care about, such as what EDDC is doing to help redress climate change and biodiversity losses. The Communications team are targeted to use their social media management tool to analyse how effectively young people engage with posts, and to present ways to widen the reach, such as by presenting the posts on different platforms and scheduling engagements on different days or times of the day. This is the same with the district's older populations, where Facebook will be used more for engagement due to the platform's older demographic of users. Residents' Updates and press releases will also be used.</p> <p>Other engagement methods to directly target older and younger demographics in the Communications strategy will be to promote face-to-face events held by Parks & Gardens Officers, such as walks with nature or wildflower identification events, as well as Officers organising consultants to carry out group engagement events. Also, schools will be liaised with to inform, engage and educate young residents with regards to the importance of Wildlife Improvement areas, how they are managed and how crucial increases in biodiversity are monitored and recorded. Pupils at Seaton Primary School in were engaged with in this way in Wildlife Improvement areas local to the school in November 2024. Pupils from different year groups were engaged with by Officers about the importance of Wildlife Improvement areas. They sowed wildflower seeds in scarified sections of Wildlife Improvement areas to help improve biodiversity and, consequently, wildlife. Pupils and teachers are encouraged to return to the areas regularly throughout 2025 to monitor the development of the wildflower areas, and to use the areas as long-term teaching and engagement resources. As a consequence of the wildflower seed sowing, the improvement in how those green spaces will look to residents will help to change the negative perceptions some residents retain of those areas.</p>			
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	<p>Finally, it is important to note that residents possessing this protected characteristic are not unlawfully discriminated against/disadvantaged because of their personal views about Wildlife Improvement areas, such as having negative feelings about a Wildlife Improvement area because they are able to see one from their residence, or because they complain to StreetScene that Wildlife Improvement areas look untidy and should be mown. Any negative feelings residents have in this respect, regardless of the extent of their feelings, are not unlawful.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.</p>			
Disability	<p>With regards to mitigation of negative impacts for residents with disabilities, Wildlife Improvement areas are designed to be located away/set back from main roads/lines if sight and are fully accessible to residents who are able to access regularly maintained green spaces, due to the Wildlife Improvement areas being regularly mown around and, where appropriate, pathways being regularly mown through them. Additionally, most Wildlife Improvement areas in regularly used green spaces are peripheral to the main sections of the park or garden, which enables residents with disabilities to decide whether or not to approach and access the areas designated to improve wildlife.</p> <p>With regards to social media posts, Parks & Gardens Officers have/will continue to post videos they make to engage and inform residents about Wildlife Improvement areas, and to use captioning to help get the message across to more people. Posts will be written in plain English, without technical wording or jargon, to be more accessible and understood, and emojis will be used to help with residents' comprehension. The Parks and Gardens email address will also be included in posts, and residents will be invited to contact Officers if they have any questions about posts or if they would like anything to be explained.</p> <p>The Wildlife Improvement policy takes into account Officers carrying out inclusive assessments to prevent negatively impacting upon or discriminating against residents with disabilities or those with limited mobility when proposing a Wildlife Improvement area. The health and safety of residents, along with their protected characteristics and</p>	⊗	□	□

	<p>their diverse representation, will take priority when assessing green spaces for transition.</p> <p>Officers are currently (January 2025) planning to adapt former signage in Wildlife Improvement areas to make the text larger and make the colouring more vivid/easier to pick out from the background by residents with vision impairments. Also, imagery – a universal language – will be used to good effect to highlight the different wildlife species that are helped by these green spaces, with different signs focusing on specific pollinators.</p> <p>The addition of braille and information in other languages on signage is currently being considered in Wildlife Improvement areas that are located in popular green spaces that have disabled access/facilities, to increase inclusion and to promote communication more widely.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.</p>			
Gender re-assignment	<p>This protected characteristic is considered not to be relevant to the Wildlife Improvement policy and the management and maintenance of those green spaces, due to direct discrimination being relevant to the workplace, and indirect discrimination being relevant to an organisation having a particular policy or way of working that puts people with the protected characteristic of gender reassignment at a disadvantage, which is also not the case with Wildlife Improvement areas or the Wildlife Improvement policy.</p> <p>Future policy reviews and revisions to Equality Impact Assessments will continue to look for the relevance of this protected characteristic, and mitigations will be put in place, if discovered.</p> <p>Due to the above, assessment of the potential impacts to this protected characteristic are neutral.</p>	□	☒	□

Marriage and civil partnership	<p>Due to this protected characteristic relating only to the workplace, it has no relationship with or bearing on the Wildlife Improvement policy and the implementation of management and maintenance practices designed to maintain the green spaces designated as Wildlife Improvement areas. Future policy reviews and revisions to Equality Impact Assessments will continue to look for the relevance of this protected characteristic, and mitigations will be put in place, if discovered.</p> <p>Due to the above, assessment of the potential impacts to this protected characteristic are neutral.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Pregnancy and maternity	<p>No person will be denied access to Wildlife Improvement areas in these circumstances or will be discriminated against by the proposed policy that implements the management and maintenance of those green spaces – or Council staff that maintain the areas. Therefore, these protected characteristics are not relevant to the Wildlife Improvement policy. No concerns of this nature have ever been raised to Officers' attention with respect to these protected characteristics, and there is nothing at the present time to suggest or indicate that the Wildlife Improvement policy has affected or will affect people possessing these protected characteristics. However, future policy reviews will refer back to this characteristic.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race and ethnicity	<p>Because defining a resident by her/his race or ethnicity highlights the differences residents possessing these protected characteristics may want to avoid, racial and ethnic groupings are only considered here because of how useful they are in monitoring inclusion by addressing potential racial discrimination and inequalities. These groupings should only be used when it is appropriate and relevant to define people by their race or ethnicity to promote representation in policy and practice.</p> <p>Central government's UK Resettlement Scheme, Community Sponsorship Scheme, and Mandate Resettlement Scheme operate in conjunction to save lives and offer stability to refugees most in need of protection. In response, Devon County Council coordinates a partnership of Town/City, District and County Councils. As a result, refugees have been resettled in East Devon and have been supported in integrating into the communities, with varying successes. There are</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>now hundreds of refugees and asylum seekers in East Devon from Syria, Afghanistan and Ukraine. These new East Devon residents that were not born in the UK and have varying degrees of difficulties speaking and understanding English can be easily, inadvertently discriminated against or disadvantaged by not being considered by the new Wildlife Improvement policy, which is not helped by the living conditions of many of these residents, e.g., with host families, in bridging hotels and, worse, being homeless. These conditions, along with language barriers, decrease the potential for inclusion by the Wildlife Improvement policy and public consultations. However, their enjoyment of Wildlife Improvement areas should not be unlawfully affected.</p> <p>With regards to mitigation of potentially unlawful discrimination of this group, the 2021 Census shows that 0.03% (3 people in a thousand) of East Devon's residents either cannot speak English or cannot speak English well. This is an exceptionally low proportion of residents, but still accounts for more than 4,500 people across the district who have difficulties with speaking and understanding English and who, therefore, could potentially be discriminated against by policy or practice, such as by signage that only exists in English, and online communication that is not available in other languages or more accessible formats. However, due to the natural open-space character of Wildlife Improvement areas and the use of illustrative signage that the areas are targeted to encourage, such as images of pollinators, birds and bats, the potential for discrimination against this very small proportion of residents who have difficulties with understanding English is considered to be exceptionally low.</p> <p>The 2021 Census data are referred to for specific wards when Wildlife Improvement areas are proposed and taken to consultation. For example, race and ethnicity were considered less than normal when transitioning traditionally green spaces in Musbury, located between Seaton and Axminster, due to <u>no</u> residents in the ward possessing these</p>			

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>characteristics, e.g., 99.8% of residents in this ward identified as having English as their main language. The remaining 0.2% of the ward's population identify as being able to speak English very well. Therefore, we can be certain that Communications in various media written in English and targeted at residents in this ward will not discriminate against residents' abilities to understand what is being communicated to them. This is the same for many other East Devon wards.</p> <p>To date (January 2025), East Devon's resettlement projects have helped 39 individuals, including families from the Vulnerable Persons and Children's Resettlement Schemes, the Afghan Relocation and Assistance Policy, and community sponsorships.</p> <p>Recognising these intersecting identities helps us to offer more compassionate and effective support for all the communities we serve. EDDC encourages an intersectional approach in all of the Council's initiatives to uplift under-represented residents to ensure its services genuinely support every East Devon resident, including the district's newest arrivals. As such, policies, plans and strategies must consider higher levels of inclusion to reflect this.</p> <p>This Equality Impact Assessment has taken the lead from EDDC as a whole with regards to inclusion, where signage across the district currently exists only in English, its website does not represent options in other languages, its social media engagement is exclusively in English, and its press releases are written only in English.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.</p>			
Religion or belief	<p>The Wildlife Improvement policy, and the strategies implemented to manage and maintain those sites, do not discriminate or disadvantage residents due to/because of their religious beliefs. This is due to the</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>policy governing Wildlife Improvement areas, in addition to the areas themselves, not relating to residents' systems of beliefs. On the contrary, analysing the ethos of Wildlife Improvement areas, it is clear that encouraging and protecting nature is key with many belief systems.</p> <p>Buddhist teachings emphasise the interdependence and interconnectedness of all living beings, including people and the natural world. Therefore, the well-being of the natural environment is crucial for the well-being of all living things.</p> <p>In Hinduism, there is no separation between the divine and nature, as they are two aspects of the same reality, and the ethos highlights the preservation of that which the believers' God created.</p> <p>With regards to Judaism, the Jewish God's people are commanded to cultivate the Earth in a way to preserve and care for what ultimately belongs to God, and any act that damages the Earth is an offence against the believers' God.</p> <p>Islam refers to nature being a means through which the Islamic God communicates with believers.</p> <p>Christianity espouses that, as stewards of the Christian God's creation, believers have a responsibility towards the environment and have a duty to do whatever they can to ensure environmental responsibility. This is due to each person being responsible for their contribution to the environment, and they must ensure they act to protect it.</p>			

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>Sikhism refers to believers needing to derive sustenance from the Earth and so should not deplete, exhaust, pollute or destroy it. Sikhs believe that an awareness of that sacred relationship between believers and the environment is necessary for the health of our planet, and for our survival.</p> <p>In the UK's latest census in 2021, 50.1% of East Devon's residents identified themselves as Christian and 47.9% identified themselves as not having a religion. Out of the remaining 2% of residents, 499 people identified as Buddhist, 154 as Jewish, 515 as Muslim, 163 as Hindu, and 33 as Sikh.</p> <p>When Wildlife Improvement areas are proposed for public consultation in towns and villages in areas yet to have this type of green space, Officers will assess information from a variety of sources to design inclusion or religion/belief prior to consultation. For example, for the Wildlife Improvement areas created in Musbury, the 2021 Census shows no representation at all in the ward for residents with Hindu, Sikh, Jewish or Muslim beliefs. This is due to residents being born in the UK making up over 95% in the ward - and 100% of the ward's population being able to speak and understand English 'well' or 'very well'. This protected characteristic was therefore not considered.</p> <p>Understanding ward data is important to understand potential levels of exclusion, as well as targeting residents' belief systems to reinforce the interconnection between major religions and nature conservation. For example, the statistics for Musbury contrast against the Census data for other wards, such as Woodbury, whose residents' population structure is more influenced by its proximity to Exeter, due to it being a commuter village for many residents. Non-Christian religions account for 2.5% of the residents' beliefs. Although this is still very low, and likewise representing very low levels of cultural diversity in the ward, residents</p>			

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>holding these religions/beliefs account for almost 100 people out of a small population of under 4,000 residents, which is statistically significant in the context of targeting inclusion in policy, practice and engagement for promotion purposes.</p> <p>Officers will regularly review 2021 Census data, in addition to data from other sources, for East Devon's residents as a whole and for each town and village that currently contain Wildlife Improvement areas that the Wildlife Improvement policy refers to.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are positive, based upon the tenets of the belief systems and how they strongly link with environmental protection.</p>			
Sex	<p>The Wildlife Improvement policy neither specifically targets nor excludes this group. However, it is crucial to ensure that all communication and consultation processes are inclusive and accessible to everyone, regardless of their sex.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.</p>	□	⊗	□
Sexual orientation	<p>This protected characteristic is considered not to be relevant to the Wildlife Improvement policy. This is mainly due to this characteristic relating to the workplace. The policy neither specifically targets nor excludes this group. However, it is crucial to ensure that all communication and consultation processes are inclusive and accessible to everyone, regardless of their sexual orientation.</p>	□	⊗	□

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.			
Armed Forces (including serving personnel, families and veterans)	<p>The Council has a legal duty to have due regard to armed forces personnel when carrying out healthcare, housing and education functions. This proposed policy and the implementation of management and maintenance practices of Wildlife Improvement areas on the ground are not relevant to this characteristic. However, it is crucial to ensure that all communication and consultation processes are inclusive and accessible to everyone, regardless of their status as current or former members of the armed forces.</p> <p>Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.</p>	□	⊗	□
Other, e.g. carers, care leavers, low income, rurality/isolation, etc.	<p>There is nothing to suggest that the Wildlife Improvement policy will adversely impact upon residents possessing this characteristic, such as the 8% of households in East Devon that contain one or more residents who are either unemployed or economically inactive due to long-term sickness or disability. This equates to 5,306 residents across the district who are financially vulnerable, which may potentially limit their experiences (such as green spaces/nature) and damage their health.</p> <p>52.4% of the district's population aged 16 and over identify as being 'economically active and in employment', 1.9% of residents identify as 'economically active but unemployed', and 45.7% identify as economically inactive (Census 2021). Care leavers are able to get help with housing from EDDC, depending on their age, and can access the Housing Options Service, which helps care leavers aged 18-20 with</p>	□	⊗	□

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>accommodation, such as if the young residents are threatened with homelessness.</p> <p>53% of the population in East Devon is of working age, which is classed as aged 19 to 65 (Census, 2021), and the average weekly full-time earnings is £491.70 (ASHE, 2022). When compared with the UK average gross weekly earnings of £693.00, and the East Devon house price to salary ratio of 10.2% (which is one of the highest in UK (Land Registry, 2022), it is clear why there is a lot of financial instability across the district.</p> <p>Wildlife Improvement communications strategies will target the Council's tenants – who typically have low incomes and have a low social-economic status – by providing information and engagement in the tenants' hard copy newsletter that is delivered to every Council tenant. Many tenants belong to multiple protected characteristics, so this is a good way of reaching these residents in a way that may be more relevant to them and their circumstances than social media posts or press releases. This will also help to reach care leavers.</p> <p>As part of the Comms plan for Wildlife Improvement areas and its policy, Officers will promote the important work formal Friends groups and the more informal parks and gardens volunteers are involved with, and how residents can enjoy the company of other people when volunteer in group activities in green spaces. The collaborative nature of group volunteering creates a positive and supportive environment that fosters a sense of camaraderie and shared purpose. This can and does help residents who are geographically, physically or emotionally isolated and lonely. Only several of the district's parks and gardens have Wildlife Improvement areas, but more will follow in the future.</p>			

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	Due to all of the above, assessment of the potential impacts to this protected characteristic are neutral.			
Negative outcomes action plan Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.				
Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
N/A	/	/	/	/
If negative impacts remain, please provide an explanation below.				
N/A				

Completed by:	Paul Fealey, Horticultural Technical Officer, StreetScene
Date:	23/01/2025
Approved by:	Andrew Hancock, Assistant Director, StreetScene
Date:	Not yet approved.
To be reviewed by:	Paul Fealey
Review date:	01.2027

Ensure that a final copy of this impact assessment is sent to HR as per the equality impact assessment guidance.



Report to: Overview Committee

Date of Meeting 20th February 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Coach Tourism in East Devon - Task and Finish Forum Update

Report summary:

This report outlines the work of the Coach Tourism Task and Finish Forum (TAFF) set up in April 2024, which aimed to explore opportunities around coach tourism development in East Devon and help increase coach passenger visitors to the district.

It provides summary on key benefits of coach tourism and key factors, which facilitate its development.

It points out what the TAFF managed to achieve and sets out recommended steps ahead.

Is the proposed decision in accordance with:

Budget Yes ☐ No ☒

Policy Framework Yes ☒ No ☐

Recommendation:

Recommendation to Cabinet that EDDC fund 50% of the costs of signage required for East Devon towns to satisfy the criteria for Confederation of Passenger Transport (CPT) Coach Friendly Accreditation as identified through the formal CPT audit process, up to £1,500 per town and an overall maximum for the district of £12,000, subject to individual town and parish councils meeting the remaining 50% of the costs.

Reason for recommendation:

To facilitate further growth of the coach tourism sector and assist our town's in achieving the Coach Friendly accreditation which should encourage a higher number of visitors and thus support local economy.

Officer: Geri Panteva, Senior Economic Development Officer, gpanteva@eastdevon.gov.uk, 01395 571750 and Richard Easthope, Parking Services Manager, 01395 571 505, reasthope@eastdevon.gov.uk

Portfolio(s) (check which apply):

- ☒ Climate Action and Emergency Response
- ☒ Coast, Country and Environment
- ☐ Council and Corporate Co-ordination
- ☐ Communications and Democracy
- ☒ Economy
- ☒ Finance and Assets
- ☐ Strategic Planning

- ☐ Sustainable Homes and Communities
- ☒ Culture, Leisure, Sport and Tourism

Equalities impact Medium Impact

Coach tourism has positive impact in terms equality and inclusivity as it caters predominantly (but not exclusively) to an older demographic. It enables people who cannot yet drive, for example school children and students and those who can no longer drive to enjoy cultural, educational and leisure experiences.

Climate change High Impact.

Coach travel has significant green credentials and lesser environmental impact, minimising traffic on roads: one single coach can take a minimum of 12 single cars off the road.

Risk: Low Risk; There are no significant risks associated with the report recommendation.

Links to background information N/A

Link to [Council Plan](#)

Priorities (check which apply)

- ☐ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☒ Resilient economy that supports local business
- ☐ Financially secure and improving quality of services

Report in full

Background

The Coach Tourism in East Devon Task and Finish Group was set up in April 2024 with the aim to increase coach passenger visitors to East Devon.

The terms of Reference outlined the following areas of activity:

1. To improve signage for attractions, coach & car parking, town centres toilets & TIC.
2. To investigate the introduction of free coach parking facilities in East Devon.
3. To identify designated drop off and pick up points for coach passengers.
4. To assess whether coach driver facilities can be introduced.
5. To assess whether meet and greet service possibly linked with TIC, towns & attractions can be introduced.
6. To foster working together as one East Devon Team improving the tourist footfall, aimed at working for our district.

The indicator of success was set up as working with a range of partners and stakeholders to improve the tourist footfall in the East Devon District area.

The following stakeholders were identified: Parish and Town Councils; DCC; Confederation of Passenger Transport; coach travel operators; TICs.

A series of meetings took place between May 2024 and January 2025. The final meeting agreed options and recommendations for consideration by Overview.

The Executive Leadership Team have reviewed and welcomed the outcome of the Task and Finish Forum and have suggested that the Overview Committee might wish to consider recommending a consultation to ascertain the public's views concerning coach tourism in the district.

Coach Tourism key stats and benefits

At the beginning of the work of the TAFF a briefing paper was produced providing an insight into coach tourism as an industry and specifically its development in Devon, to highlight the importance of the sector, set the context and inform the work and decision-making process of the TAFF.

The full briefing paper is presented in Appendix A.

Key UK stats on coach tourism

- Coach tourism contributed £14 billion to the UK economy (2019)
- One coach can keep up to 50 cars off the road
- In 2019 there were 23 million visits to tourist attractions and locations by coach
- The coach industry employs 42,000 people
- There are 2,500 coach operators in the UK
- 80% of the coach industry's income is from tourism-related work

Key facts about coach tourism and its importance

- Year-round operation, significant contributor to occupation during the shoulder season
- Very loyal customer base; consistency, predictability, ability to plan - bookings occur up to an year in advance
- Requires a 'full package' approach - from coach parking, accommodation and attractions to visit to food & drink and shopping experiences. Established itineraries are key.
- Accessibility is very important, both in terms of ease of access for coaches and accessible facilities, including public toilets provision
- Economic enabler - very important to expanding the season/maintaining business during shoulder periods
- Resilience of the sector – predicted decline has not materialised; growing market nationally, but tends to stick to familiar destination, tried & tested approach
- Tends to cater for an older demographic, for many holiday makers this type of travel is now their holiday of choice. However, it's not just an OAP market - attracting younger profile of visitors via increasing share of school trips, university groups, professional associations, special interest groups, etc.
- Green credentials, lesser environmental impact, minimising traffic on roads: one single coach can take a minimum of 12 single cars off the road and that can easily rise to 24 cars for a full 48-seater coach.
- Inclusivity: coach travel enables people who cannot yet drive, for example school children and students and those who can no longer drive to enjoy cultural, educational and leisure experiences. Coach travel is an inclusive form of transport that brings customers to destinations and towns which they may otherwise not visit or experience. Contributes to a more welcoming and inclusive visitor experience that benefits local residents, as well.

Main enablers for its development

- Road infrastructure and parking facilities
- Good signage and accessibility
- Established itineraries and content to sell
- Sufficient accommodation provision
- Ability to offer familiarisation visits for prospective group organisers and operators

What incentivises coach tourism

- Provision of sufficient coach parking and rest stops
- Drop off points conveniently located for coach passengers to access services
- Facilities for drivers, incentives, e.g. vouchers, food & drink provision
- Well-maintained roadside facilities

- Clear guidance on traffic management affecting coaches
- Group travel offers and visitor information
- Established relationship with coach tour operators; welcoming environment

Risks associated with increased coach tourism and mitigation against them

Risk	Mitigation
Increased pressure on road infrastructure	Assessment of capacity to handle any increased traffic by professional bodies like the Confederation of Passenger Transport; Ensuring there is clear signage provision
Pressure on parking facilities	Assessment of current parking provision and potential to increase it
Pressure on accommodation provision	Assessment of available provision
Risk of overtourism	Assessed via current and expected volume and value of tourism

In East Devon's case coach tourism is still not a fully developed offer so there is potential to encourage further development for the local economy benefit. EDDC's Tourism Strategy identifies the role of the Council as an enabler for the sector and through facilitating further developments and improvement of infrastructure, it will create better conditions for private sector to take advantage of the benefits this type of tourism brings.

EDDC's Parking strategy seeks to actively encourage tourism and ensure the long-term economic sustainability of our towns, coastline and shopping areas. It encourages coach tourism through suitable parking arrangements.

Internal review of coach parking assessed current provision and determined there is suitable coach parking provision and should there be increased demand more coach park spaces can be created.

The tourism sector is still recovering from the impact of the Covid pandemic and visitor numbers and spend have not reached pre-pandemic levels so there is no risk of overtourism. There is slowing down of initial growth straight after the end of the pandemic and the cost of living crisis has further slowed down growth in the last couple of years.

Confederation of Passenger Transport conducts audits for all settlements applying for Coach Friendly status so it assesses the area's road infrastructure and its capacity to handle increased coach numbers.

Accommodation provision in East Devon was assessed as part of the development of the Tourism Strategy and it was determined that serviced accommodation provision is sufficient.

Work of the Coach Tourism TAFF

The TAFF identified that one of the main ways to support coach tourism is to encourage our towns and villages to apply for a Coach Friendly status, a national scheme run by Confederation of Passenger Transport (CPT): [Coach Friendly Scheme | CPT \(cpt-uk.org\)](https://www.cpt-uk.org/coach-friendly-scheme)

The scoping document indicated that the target towns are Exmouth, Budleigh, Sidmouth, Beer, Seaton, Honiton, Colyton, Axminster, Ottery St Mary.

The clerks of the above towns and villages have been approached with information on coach tourism and Coach Friendly application for their consideration.

On the invitation of the TAFF, applications for Coach Friendly status were submitted to CPT from six town and parish councils: Beer, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth, representing significant progress and commitment to the coach friendly initiative.

Axminster and Budleigh Salterton expressed interest in the Coach Friendly scheme for their towns but are not yet in a position to apply.

Coach parking is a major consideration for all of the towns wishing to apply for coach friendly accreditation and EDDC coach parking provision was assessed as well as that offered by local businesses.

It was deemed that there was suitable coach parking provision in all towns except Axminster and Budleigh Salterton, and that the coach parking bays in Ottery St Mary were in need of reinvigoration as part of the upcoming resurfacing works in the Land of Canaan car park.

Existing coach parking tariffs were also reviewed and these were not seen as a barrier to the towns gaining the desired accreditation.

Where the aspiration is that all towns achieve coach friendly status in order for EDDC to be deemed a completely coach friendly district, coach parking provision will need to be identified in Axminster and Budleigh Salterton should they wish to continue with their application. As there is currently no EDDC coach parking provision in either of these locations, space will need to be identified on EDDC land, or be provided a local business or landowner. The impetus for progressing this will remain with the relevant town council with EDDC committing to support reviewing the various options, including providing new coach parking bays within EDDC car parks.

The Confederation of Passenger Transport (CPT) was approached and asked to inspect the towns and report on the steps they need to take to meet the criteria for coach friendly status.

The TAFF received presentations on best practice and helpful contributions to inform priorities from Lauren Clark of Stuart Line Cruises, Lisa Bowman, Exmouth Town Clerk, Rons Boatman, Exmouth Town Council's Tourism Officer and Phil Smith from the Confederation of Passenger Transport (CPT), the Coach Friendly awarding body.

Additional support was agreed from the Sustainable Tourism Programme funded through the UKSPF for sponsoring our Coach Friendly status ready towns to take part in a dedicated Group Travel Campaign run by Visit South Devon (which includes East Devon).

The Coach Friendly status and the Group Travel campaign were identified as an excellent starting point for towns and villages looking to attract more coach tourism and benefit from increased group tourism visitors.

CPT's Phil Smith visited East Devon in November to carry out a Coach Friendly audit of the towns. In the event, due to heavy snowfall, he was only able to visit Exmouth, Honiton and Sidmouth. The outcome from the audits was that all three locations needed to install some directional signage, to satisfy the requirements for Coach Friendly accreditation.

The audits for Ottery St Mary, Seaton and Beer remain outstanding.

Exmouth has been awarded Coach Friendly status currently on a 12-month rolling renewal, having obtained a written commitment from DCC that the required signage will be built into the delivery timetable for the Dinan Way extension, at no additional cost to the town council. Sidmouth and Honiton are in the process of exploring costs.

The CTP representative will return to East Devon to complete the audits of Beer, Seaton and Ottery in early Spring.

The recommendations of the audits already performed have informed this report and its own recommendations.

The TAFF considered that it should be a joined responsibility of the district and the towns to secure financial resources for the additional signage required, as the benefits of the increased tourism will be widely felt across the district.

As an outcome from the TAFF's work, this report recommends to Cabinet that the costs for signage are met 50/50 by the respective town and parish councils and EDDC up to the maximum identified above.

Financial implications:

The request for is Council to approve a supplementary (new) budget of up to £12,000 which will have to be from the General Fund Balance.

Legal implications:

There are no substantive legal issues to be added to this report.

APPENDIX A

Coach Tourism in East Devon Task and Finish Forum

COACH TOURISM IN DEVON BRIEFING PAPER

(May 2024)

Background

This paper looks to provide an insight into the coach tourism as an industry, and specifically its development in Devon, in order to inform the work and decision-making process of the newly formed Coach Tourism in East Devon Task and Finish Forum at EDDC.

Key UK stats

- Coach tourism contributed £14 billion to the UK economy (2019)
- One coach can keep up to 50 cars off the road.
- In 2019 there were 23 million visits to tourist attractions and locations by coach
- The coach industry employs 42,000 people
- There are 2,500 coach operators in the UK
- 80% of the coach industry's income is from tourism-related work

Key facts about coach tourism and its importance

- Year-round operation, significant contributor to occupation during the shoulder season
- Very loyal customer base; consistency, predictability, ability to plan - bookings occur up to an year in advance
- Requires a 'full package' approach - a destination must tick all of the boxes for operators and group organisers in order to be attractive: from coach parking, accommodation and attractions to visit to food & drink and shopping experiences
- Itineraries are key
- Accessibility is very important, both in terms of ease of access for coaches and accessible facilities, incl. public toilets provision
- Economic enabler - very important to expanding the season/maintaining business during shoulder periods
- Resilience of the sector – predicted decline has not materialised; growing market nationally, but tends to stick to familiar destination, tried & tested approach
- Not high-end but good volumes
- Tends to cater for an older demographic, for many holiday makers this type of travel is now their holiday of choice. However, it's not just an OAP market - attracting younger profile of visitors via increasing share of school trips, university groups, professional associations, special interest groups, etc.
- Green credentials, lesser environmental impact, minimising traffic on roads: one single coach can take a minimum of 12 single cars off the road and that can easily rise to 24 cars for a full 48-seater coach.
- Inclusivity: coach travel enables people who cannot yet drive, for example school children and students and those who can no longer drive to enjoy cultural, educational and leisure experiences. Coach travel is an inclusive form of transport that brings customers to

destinations and towns which they may otherwise not visit or experience. Contributes to a more welcoming and inclusive visitor experience that benefits local residents, as well.

Main enablers for its development

- Road infrastructure and parking facilities
- Good signage and accessibility
- Established itineraries and content to sell
- Sufficient accommodation provision: 75– 80 bedrooms min; 120 – 130 rooms optimum
- Ability to offer familiarisation visits for prospective group organisers and operators

Key stakeholders

- Coach travel operators
- DMOs
- Accommodation providers (major hotels)
- Tourist attractions
- Leisure facilities
- Local authorities (parking arrangements, meet & greet services, public realm maintenance)

Key players

Industry Bodies

- Coach Tourism Association <https://coachtourismassociation.co.uk>
- Visit England [Home | VisitEngland](#)
- Visit Britain [UK Tourism Industry Statistics & Research | VisitBritain.org](#)
- Confederation of Passenger Transport [CPT | CPT \(cpt-uk.org\)](#)
- Road Haulage Association [Coach Membership \(rha.uk.net\); https://www.rha.uk.net/Campaigns/Coaches](#)

Main coach tourism operators

- Shearings: <https://www.shearings.com/coach-holidays/uk>
- Just Go Holidays <https://www.justgoholidays.com>
- National Holidays <https://www.nationalholidays.com>
- Johnsons Coaches <https://www.johnsonskoaches.co.uk/holidays/>
- Alfa Travel <https://www.alfatravel.co.uk/>
- Caledonian Travel <https://www.caledonian.com/>

What incentivises coach tourism?

- Provision of sufficient coach parking and rest stops
- Drop off points conveniently located for coach passengers to access services
- Facilities for drivers, incentives, e.g. vouchers, food & drink provision
- Improved/well-maintained roadside facilities
- Clear guidance on traffic management affecting coaches
- Group travel offers and visitor information
- Established relationship with coach tour operators; welcoming environment

Key Devon coach tourism destinations

- Torquay
- Paignton

- Plymouth
- Exmouth
- Sidmouth
- Ilfracombe
- Lynton
- Dartmouth

East Devon's main coach travel destination geared to receive higher volume of group visitors by coach are Exmouth, Sidmouth and Seaton.

Main players in Devon

The Coach Tourism Association (CTA) has a number of active and engaged members in Devon, including Stuart Line Cruises, Devon's Top Attractions, Babbacombe Model Village, Brend Hotels, South Devon Railway, Destination Plymouth, Plymouth Boat Tours and Coldharbour Mill Museum. Devon is one of their strongest counties in terms of membership numbers among attractions, and they report strong appetite and market for coach groups in the region.

Destination Plymouth - Plymouth is home to some incredible group friendly attractions, catering for different interests – from the UK's largest aquarium to historical boat trips around Plymouth, museums like The Box and experiences like tours of the Plymouth Gin Distillery. Breadth and richness of the offer and experiences is key. Well-developed itineraries for group visits.

Devon's Top Attractions (DATA) - Devon's Top Attractions represents high-quality visitor attractions in Devon. Annually inspected to meet quality standards, ensuring visitors enjoy a quality day out on every level. They offer a whole host of interesting and varied days out. Members range from castles, botanical gardens, museums to theme parks, zoos, steam railways, narrow gauge trams and boat cruises.

A one stop information shop and a group trip itinerary planning service is available, plus attractive prices and joint ticketing options.

Visit South Devon – VSD has been active in this market for a few years now and has created a new area on their website dedicated to Group Travel [Group Travel and Coach Parties to South Devon \(visitsouthdevon.co.uk\)](http://visitsouthdevon.co.uk). It has developed a group travel plan to help increase awareness of the towns in South Devon as a group/coach friendly destination for the travel trade and tour operators. It provides bespoke itineraries for the towns who have bought into their Group Travel Campaign last year. They are about to launch the same campaign for this year in the coming month. They are planning to create thematic itineraries linking up the towns across all of South Devon (which also covers East Devon), e.g. Heritage, Cultural, Food and Drink, Sustainability, etc.

They have exhibited at the British Tourism & Travel Show (BTTS) this year and the past 3 years with Devon's Top Attractions (DATA). They also have developed an extensive new database of Group Travel, Coach companies and Tour ops which we have built over the past 3 years.

Visit Exmouth – There is significant activity supporting coach tourism, and an engaged Town Council providing meet & greet service to coach operators. Resources have been developed over the years including coach drivers directory, enclosed coach driver's flyer produced by ETC and the Council has previously provided vouchers for coach drivers in partnership with local cafes.

The town is well geared towards coach tourism, offering 'the full package' of facilities and opportunities and has some of the most active players, like Stuart Line Cruises and World of Country Life.

Visit Exeter - Exeter is a well-established coach tourism destination focusing on shopping, heritage and culture. It's a market Visit Exeter has focused on in the past, benefitting from a lot of day visitors from nearby destinations with overnight coach trips, such as Torquay and Exmouth.

Visit Exeter used to provide a helpful and informative one-stop booking service, including organising guided tours with Exeter's Red Coat Guides: booking attractions visits; suggesting tailor-made group itineraries; accommodation advice and help with coach parking.

It used to run campaigns to promote Exeter as a destination for groups, e.g. press releases, advertising and editorial in the group travel publications, attending exhibitions aimed at that market such as Excursions, the Group Leisure & Travel Show and BTTS (British Tourism & Travel Show), and producing group itineraries and a group travel guide. They have also worked with local cafes to offer incentives to coach drivers, e.g. free drink/cake in a local café while they wait.

Last year they had major cuts to the tourism department, so this is no longer a market they're able to focus on, due to lack of budget and resource. They still have a section on their website with info and itineraries etc.: [Group Visits in Exeter \(visitexeter.com\)](http://www.visitexeter.com), and send out e-newsletters to a database of group travel organisers occasionally, but we no longer do any paid advertising or offer incentives.

North Devon: While North Devon is still an important coach tourism destination in Devon (Ilfracombe being the main destination), currently no organisation has a leading role in coach travel arrangements locally. The district council does not engage directly in activities supporting the sector. There have been issues with loss of hotel provision, decrease of this type of holidays as they are not specifically nurtured or incentivised. The area is aiming at a more affluent/higher spend market; There are coach drop off points in existence, but provision has not been increased and there have been turning circle issues in Ilfracombe.

Enclosed:

Coach driver's flyer Exmouth Town Council produced in 2016:



00256 ETC Coach
Drivers Flyer FVIS Fir

Devon Guide for Groups by Beau Media: [Bespoke Guide to Devon for Groups by Beau Media - Issuu](#)

Photo of Exmouth's coach park, taken on 15th May 2024 showing some of the 12 coaches parked on the day:



Overview Committee Work Programme 2024 - 2025
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Proposed date	Topic
TBC – keep under review	Overview Proposal Form and Scoping Template
TBC	The banning of the use of snares and glue traps on council owned land
March 2025	Housing Strategy
March 2025	East Devon & Blackdown Hills National Landscape Annual Review and Management Plan
March 2025	Policy Review Project Plan
March 2025	E-petitions

EAST DEVON DISTRICT COUNCIL

Forward Plan of Key Decisions - For the 4-month period: 1 March 2025 to 30 June 2025

This plan contains all the Key Decisions that the Council's Cabinet expects to make during the 4-month period referred to above. The plan is rolled forward every month.

12.1.1 Key decisions: A "key decision" means an executive decision which is likely:

- (a) to result in the Council incurring expenditure or the making of savings of £100,000 or more; or
- (b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the Council's area:
 - (i) In accordance with section 38 of the Local Government Act 2000, in determining the meaning of "significant" regard shall be had to any guidance for the time being issued by the Secretary of State
 - (ii) A decision taker may only make a key decision in accordance with the requirements of the Executive Procedure Rules set out in Part 4 of this Constitution.

A public notice period of 28 clear working days is required when a Key Decision is to be taken by the Council's Cabinet even if the meeting is wholly or partly to be in private.

The Cabinet may only take Key Decisions in accordance with the requirements of the Executive Procedure Rules set out in Part 4 of the Constitution and the Local Authorities (Executive Arrangements) (Meetings and Access to information) (England) Regulations 2012. A minute of each Key Decision is published within 2 days of it having been made. This is available for public inspection on the Council's website <http://www.eastdevon.gov.uk>, and at the Council Offices, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton. The law and the Council's constitution permit urgent Key Decisions to be made without 28 clear days' notice of the proposed decisions having been published provided certain procedures are followed. A decision notice will be published for these in exactly the same way.

This plan also identifies Key Decisions which are to be considered in the private part of the meeting (Part B) and the reason why. Any written representations that a particular decision should be moved to the public part of the meeting (Part A) should be sent to the Democratic Services Team (address as above) as soon as possible. **Members of the public have the opportunity to speak on the relevant decision at the meeting in accordance with the Council's public speaking rules.**

Obtaining documents

Committee reports in respect of Key Decisions include links to the relevant background documents. If a printed copy of all or part of any report or background document is required, please contact Democratic Services (address as above) or by calling 01395 517546.

Members of the public who wish to make any representations or comments concerning any of the Key Decisions referred to in this Forward Plan may do so by writing to the Leader of the Council c/o Democratic Services (as above).

February 2025

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Procurement of CBRE through the Crown Commercial Services Framework to undertake work in relation to the second new community	Delivery Manager					Part A
Colyford Road and Fosse Way Viability Assessment	Assistant Director Place Assets & Commercialisation	Colyford Road and Fosse Way Viability Assessment	No	Asset Management Forum		Part A *possibly some Part B commercially sensitive
Cloakham Lawns Employment Site Viability Assessment	Assistant Director Place Assets & Commercialisation	Colyford Road and Fosse Way Viability Assessment	No	Asset Management Forum		Part A *possibly some Part B commercially sensitive
Exmouth Town and Seafront Placemaking Plan Adoption	Assistant Director Place Assets & Commercialisation	Placemaking Plan and appendices	Yes some Strategic Outline Business Cases (SOBC)	Placemaking in Exmouth Town and Seafront Group		Part A *possibly some Part B commercially sensitive

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Towards Zero Carbon Development in the West End: Interconnector Project Final Investment Decision (Parts 2)	Director of Place	Full Business Case			May/June 2025 Part 2	Part B
Use of Climate Change Budget to support Green Loans to Householders	Assistant Director Environmental Health					Part A
Air Quality/Contaminated Land Strategies	Assistant Director Environmental Health					Part A
Annual Ombudsman report	Director of Governance					Part A
Update on DBS checks for members	Director of Governance					Part A
Anti-Poverty Strategy	Asst Director Revenues, Benefits, CSC, Fraud & Compliance	Outcomes from consultation		Poverty Working Panel	5 March 2025	Part A

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Place and Prosperity Fund acquisition	Assistant Director Place Assets & Commercialisation	None	Business case/Appraisal of proposal	Place and Prosperity Investment Board	5 March 2025	Part B
Site Acquisition	Project Manager Place, Assets & Commercialisation					Part B
page 47 Formation of an Exmouth Town and Seafront Subgroup	Assistant Director Place Assets & Commercialisation	Steering Group ToR		Placemaking in Exmouth Town and Seafront Group		Part A
Council Depots Review	Project Manager Place, Assets & Commercialisation					Part B
Hayne Lane Masterplan	Assistant Director Place Assets & Commercialisation	Hayne Lane Masterplan	No	Asset Management Forum		Part A *possibly some Part B commercially sensitive
Strategic Development Review – Exeter Science Park Limited (01/03/24)	Director of Place		No			Part B (information relating to finance)

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Procurement for Main Contractor for Clyst Meadows SANG, Broadclyst	Assistant Director Countryside and Leisure				2 April 2025	Part A
Lottery Bid Naturally Connected - Connecting Communities with the Heritage of the Clyst Valley	Assistant Director Place Assets & Commercialisation				2 April 2025	Part A
Housing Strategy	Director Housing and Health				30 April 2025	Part A
Dog Control Enforcement Policy	Assistant Director Environmental Health				Spring 2025	Part A
Private Sector Housing Enforcement Policy	Assistant Director Environmental Health				Spring 2025	Part A
Cranbox Project – procurement	Frances Wadsley / Naomi Harnett	No	No	Cranbrook Placemaking Group	5 March 2025	Part A

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Cranbox Project Update	Frances Wadsley / Naomi Harnett	No	No	Cranbrook Placemaking Group	5 March 2025	Part A
Enterprise Zone Implementation Plan	Frances Wadsley / Naomi Harnett	No	No	None	April 2025	Part A
District Heating Expansion Areas Project – procurement (technical /legal/ financial consultants)	Naomi Harnett	No	No	None	5 March 2025	Part A
District Heating Expansion Areas Project – project update	Naomi Harnett	No	No	None	April 2025	Part A
Climate Change Strategy	Assistant Director Environmental Health				Summer 2025	Part A
Public Space Protection Orders	Assistant Director Environmental Health				Winter 2025	Part A
UK Shared Prosperity Fund Year 4	Economic Development Manager				5 March 2025	Part A

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Asset acquisition in Exmouth	Project Manager Estates					Part B
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Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Key Officer Decisions

Individual property: external and internal repairs and refurbishment	Assistant Director Housing					Part B Officer Decision
Individual property: external and internal repairs and refurbishment	Assistant Director Housing					Part B Officer Decision
Individual property: external and internal repairs and refurbishment	Assistant Director Housing					Part B Officer Decision
Procurement Support from Devon County Council – renew 5- year SLA (01/05/24)	Director of Finance					Officer Executive Decision
Household Support Fund – Determining groups for targeted support	Assistant Director Customer Services, Revenues & Benefits		As per Cabinet recommendation at their meeting 30 October 2024			Officer key decision

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Exmouth East Devon Tennis Centre, Roof Works. Appointment of contractor (19/03/24)	Simon Allchurch / Jorge Pineda-Langford					Appointment of contractor. Request for Officer Executive Decision
Sidmouth Manor Pavilion Theatre and Art Centre, Internal Decorations and Refurbishment (19/03/24)	Steve Parker / Jorge Pineda-Langford					Appointment of contractor. Request for Officer Executive Decision
Exmouth the Pavilion Theatre, Flytower and Auditorium Works. (19/03/24)	Steve Pratten / Jorge Pineda-Langford					Appointment of contractor. Request for Officer Executive Decision
Exmouth Withycombe Changing Rooms, Decarbonisation / Boiler replacement Works (19/03/24)	Paul Manning / Jorge Pineda-Langford					Appointment of contractor. Request for Officer Executive Decision
Exmouth the Pavilion Theatre, Roof Works (19/03/24)	Paul Manning / Jorge Pineda-Langford					Appointment of contractor. Request for Officer Executive Decision
Decarbonising TDDC swimming pools (20/03/24)	Jorge Pineda-Langford					Appointment of consultants to undertake design work.

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Bathroom Adaptations to 20 properties	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision
page 33 Bathroom Adaptations to 30 properties ED0322-24 (16/09/24)	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision
Structural Repairs & Refurbishment – 33, 35 & 37 Underleys, Beer (25/11/24)	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision
Refurbishment of Flats, Langford Avenue, Honiton	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision
Refurbishment of 4no. Blocks of Flats, Arcot Park, Sidmouth	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Refurbishment & Extension of 1 School Lane, Newton Poppleford	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision
Internal Adaptations to various properties	Planned Works & Climate Change Manager					Appointment of contractor. Request for Officer Executive Decision
River Axe Local Nutrient Mitigation Fund governance framework	Assistant Director – Countryside & Leisure				5 March 2025	Part A
EDDC Habitat Bank framework (Environment Act 2021 duty)	Assistant Director – Countryside & Leisure				5 March 2025	Part A
EDDC Tree, Hedge & Woodland Strategy 2024-34	Assistant Director – Countryside & Leisure				5 March 2025	Part A
Blackdown Hills National Landscape Management Plan 2025-2030	Assistant Director Countryside and Leisure				June 2025	Part A

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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EDDC Local Nature Recovery Plan	Assistant Director Countryside and Leisure				July 2025	Part A
EDDC National Landscape Management Plan 2025-2030	Assistant Director Countryside and Leisure				September 2025	Part A

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Officer Decisions to enter into Contract

Sidmouth and East Beach BMP – Approval to enter design and construction contracts	Assistant Director StreetScene	Date
Recycling and Waste: - MRF/Baling Plant Refurbishment/Site Compliance - vehicle refurbishment programme	Assistant Director StreetScene	
EDDC lifeguard service provision and funding (26/02/24)	Assistant Director StreetScene	

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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Seaton Wetlands southern expansion and habitat creation project – HLF bid over £100K	Countryside Manager	EOI by January/Feb 2025 TBC
Nature for Towns and Cities HLF bid over £100K	GI Manager	EOI date TBC
East Devon National Landscape HLF Open Programmes bid for Landscape Connections project	East Devon NL Manager	EOI Dec 2024

Key Decision (date added to FP)	Portfolio (Lead Officer)	Documents to be considered before Cabinet take decision	Whether other documents will be considered before decision taken [Y/N]	Other meetings where matter is to be debated / considered	Date of Cabinet meeting	Part A = Public meeting Part B = private meeting [with reasons]
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