

Reasons for seeking to defer agreement of NCIL Policy at September 2024 meeting of Broadclyst Parish Council

- Before we agree a NCIL policy we ought to agree a Strategic Plan.
- We need to debate whether the Strategic Plan and NCIL policy will take into account the peculiar geography of the parish. In particular, it is not possible to drive from Tithebarn to Westclyst or Broadclyst without driving through Pinhoe or Broadclyst Station. Station Road will be permanently closed at the south end as part of the works for the Bluehayes development, and then the route will be through Cranbrook. During the rush hours these journeys take about half an hour on average, already. These times are likely to increase. The B3181 acts as a communication spine for two thirds of the parish, it does not directly connect with the other third. So use of infrastructure at Westclyst and Broadclyst by Tithebarn residents (and vice versa) will be constrained. Residents of Westclyst and Broadclyst will be more likely to go to Pinhoe and Cranbrook (respectively) than to Tithebarn, and vice versa.
- We need to understand the scale of the issue under consideration, and where the money is coming from. The finance committee minutes are silent on this matter, even though Broadclyst has had more NCIL allocated than any other parish in East Devon. See my Appendix 1.
- We need to understand that since the introduction of CIL, some S106 undertakings have fallen away. The Head of Planning Obligations at EDDC has offered to talk to the parish about NCIL and I think we should take up that offer.
- We need to debate whether the Strategic Plan and the NCIL policy will take into account the massive disparity between the 3 villages (Broadclyst, Westclyst, Tithebarn), in terms of the facilities and infrastructure on site. It's not all one-sided. Westclyst is the only village with a skate park. The Policy must recognise and take these disparities into account.
- We need to debate whether NCIL should deliver equitable provision whereas some of the wording implies *equal* provision¹. "Equitable" is used in the wording, and we welcome that. But the Policy also calls for "equal" provision, implying that whatever we support in one area, we must equally support in another area.
- We need to debate whether NCIL projects "must" benefit the whole parish². For example Highways improvements outside Site H3 (Heathfield), which is set out in the NP, would not really benefit the residents of Tithebarn to a significant degree. Four of the Community Projects in the NP will not benefit the whole

¹ Page 2, 4.2, "balanced development and provision across the parish".

² Requirement to benefit "whole parish" is stated on pages 1, 2 (twice)

parish to a significant degree . One shining exception is Clyst Valley Trail (CVT) which links Tithebarn, Westclyst, and Broadclyst. However it's difficult to identify any other significant infrastructure proposal that would benefit the whole parish.

- NCIL should NOT be prohibited from contributing to projects that are the duties of other public bodies or principal authorities. Projects identified through the NP such as the Highways improvements outside Site H3 are the responsibility of the Highways Authority but we can contribute.
- NCIL should NOT “have to” align with Broadclyst NP, although projects in the NP will of course be priorities. The balance of NCIL projects in the NP is not fully aligned with the balance of other considerations noted above.
- NCIL Policy should NOT have to align with the Broadclyst Parish Strategy (before we have seen it)
- Future changes to the CIL Policy should NOT have to show a higher level of consultation than the original CIL policy

Henry Gent 23.08.2024

Appendix One

From: Jonathan Smith <Jonathan.Smith@eastdevon.gov.uk>

Sent: Monday, June 24, 2024 9:32 AM

To: Cllr Paula Fernley <Paula.Fernley@eastdevon.gov.uk>

Cc: Henry Gent <henry.gent@broadclyst.org>; Ed Freeman <EFreeman@eastdevon.gov.uk>; tbilleter@eastdevon.gov.uk

Subject: CIL Money in Broadclyst

Dear Cllr Fernley

I refer to your email to Ed of 19 June. He has asked me to respond as Planning Obligations Team Leader.

The table below shows the Neighbourhood portion of CIL collected from each of the 3 categories of development that you specified.

There is also approximately £0.5m (including c. £400k in Tythebarn & Blackhorse) of potential CIL linked to unimplemented planning consents.

Area	Neighbourhood CIL Collected
Tithebarn and Blackhorse	£625,841.34
Westclyst	£38,394.77
Broadclyst Village and the Rest of the Parish	£16,481.24

In respect of Sovereign Homes, a CIL exemption has been applied for. Affordable housing is subject to relief under the CIL regulations. This relief will be lost if the houses cease to be affordable over the 7-year exemption period.

Please do not hesitate to contact me if you require any further information or guidance as to how the CIL money could be spent.

regards

Jonathan

Jonathan Smith

Planning Obligations Team Leader

Development Management

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