



Comments from Fairford Town Council on CDC Consultation on Medium Term Budget Strategy 2019/20 to 2028/29

Fairford Town Council welcomes the opportunity to comment on the Budget Strategy and supporting documents (including the Summary Finance, Service Performance Report, which provides the context in which to judge the proposals).

In summary, we are concerned that:

- There is a significant amount of money from New Homes Bonus for recent housing delivery that is held in reserves, but there has not yet been any effective consultation with affected communities, as “expected” under central government policy, about how this money should be spent to address the local impacts and needs arising from this development. Indeed, a large proportion of this seems to have been allocated to unrelated projects/purposes.
- There is too much focus on Cirencester, effectively drawing resources and footfall away from other Principal Settlements in the District, which desperately need these in order to maintain their sustainability. At the same time, CDC risks duplicating or conflicting with the Neighbourhood Planning process for Cirencester, with consequent inefficiencies.
- There is still a lack of a comprehensive economic strategy covering all settlements in the District, to ensure that these remain sustainable. In the absence of GCC or the LEP providing this, there is a need for this activity to be resourced.
- Underspends and overspends in certain budget areas, including Environmental & Regulatory and Development Management, indicate an inadequacy of budgeted resources to fulfil the Council’s statutory responsibilities, which has not been adequately addressed in the budget proposals.
- The arrangement with Publica is meaning that Cotswold District Council Tax payers are not getting “value for money” from certain key resources.
- The ‘Top Tasks’, ‘Performance Indicators’ and ‘Efficiency Measures’ are too narrow, and/or the targets not sufficiently challenging, to ensure that all key areas are adequately covered.
- It is unclear how the financial and economic risks associated with Brexit are being addressed.

Concerns

Use of money from New Homes Bonus

In the absence of an up-to-date Local Plan major housing developments have already taken place in the District in the current plan period (2011-2031), for which CDC will have received a cumulative total of some £16m in New Homes Bonus (NHB) payments by the end of the current financial year. A significant proportion (approx 8%) of the related housing completions, and therefore the payments, have been in relation to development in Fairford (Ref Local Plan EIP document ED046, Table 10). On a pro rata basis this is about **£1.3m** for development in Fairford.

NHB was supposed to compensate for additional costs on the local authority and address impacts on local communities due to this housing development. Central Government policy on the NHB states that “Local councils can decide how to spend the New Homes Bonus. However, we expect local councils to consult communities about how they will spend the money, especially communities where housing stock has increased.” (Ref <https://www.gov.uk/government/publications/2010-to-2015-government-policy-house-building/2010-to-2015-government-policy-house-building#appendix-8-new-homes-bonus>). However, in practice there has been no effective consultation by either CDC or GCC (who have also received a share of NHB) about how the money should be spent, and little or none of this has been spent locally to address the impact of and needs arising from the development. This is particularly important in Fairford, which (along with Lechlade) is recognised (Ref Local Plan para 9.7.9) as having relatively less shops, facilities and services, and therefore be less self-sufficient, than Cirencester and the 5 Key Centres (Bourton-on-the Water, Chipping Campden, Moreton-in-Marsh, Stow-on-the-Wold and Tetbury). At the same time, there seems little prospect of public transport connections to Cirencester or other major centres being enhanced or maintained at any more than a basic level. There is now an urgent need to address this issue.

Adequacy of resources for Planning (including Enforcement) and Environment

Other areas of concern include the adequacy of current and proposed resources to fulfil the authority’s responsibilities effectively with regard to the processing of Planning applications, planning enforcement and the protection of the natural and historic environment. Under-spend on some budgets, including staffing, is of significant concern, particularly when considered in the context of performance targets which seem quite narrowly focused. While this may keep ‘costs’ down, this is likely to mean that CDC’s Council Tax payers are not getting either their share of the benefit of key resources under the Publica ‘umbrella’ – or ‘value for money’.

In particular, the Performance Report (section 2 and Appendices B,D) shows:

- Under-spend on Environmental & Regulatory – Based on our experience and statements made at the recent Flood meeting in Cirencester (November 2018) we have a concern that key resources such as Lawrence King (EVS 5) are being disproportionately employed elsewhere by Publica to the detriment of Cotswold District. We also understand that CDC still does not have the necessary expertise in some key areas, e.g. to provide proper independent assessment of sewer improvement schemes for clearance of planning conditions and have been relying (inappropriately) on reports provided by the water/sewage undertaker on behalf of developers.
- Overspend on Development Management (including Forward Planning) – Based on our experience, we are concerned that this is indicative of CDC having under-resourced this area in the past, with an impact on their ability to fulfil their statutory duties in respect of protecting/maintaining heritage and environment and the sustainability of communities in the District, including proper cooperative support for Neighbourhood Planning.

Proper Use of Accumulated Reserves

Section 10 of the draft MTFS indicates that a significant proportion of the NHB remains unallocated within total reserves of approx £12.3m, and a significant share of this should therefore still be available to support local projects in Fairford or elsewhere.

It would seem to make sense for CDC to allocate this expenditure earlier rather than later, to avoid the risk of being 'penalised' for having been prudent in the past and of Fairford consequentially never receiving any compensation/benefit.

Priorities

Based on our experience in the past and what we have been told about 'prioritisation', there is a need to ensure resources are adequate (i.e. probably increased) to ensure heritage and environment are protected properly in line with CDC's statutory responsibilities and national policy objectives – including increased resourcing/improvements to the validation process for planning applications (which does not seem to have been applied properly in a number of cases), and resourcing to ensure more timely action on enforcement (in cooperation with Town/Parish Councils, who will be reluctant to provide this service on a voluntary and unpaid basis unless this is done). Having said this, the Planning Enforcement team have been more responsive to us in recent months, so it seems progress is now being made.

Associated with this, there is a need to ensure that the 'Top Tasks' (Appendix A of the Performance Report), Performance Indicators (Appendix B) and 'Efficiency Measures' (Appendix C) are sufficiently comprehensive, and the associated targets are well defined and sufficiently challenging, to ensure that all key areas with potential impact on communities are covered and Council Tax payers receive 'value for money' from performance. There is clearly a danger that if only certain things have remunerative performance targets allocated to them other things will be neglected.

It is unclear how the financial and economic risks associated with Brexit are being addressed in the financial strategy. This seems a major omission.

Regarding Revenue Reserves (section 10 of the draft MTFS), we note that existing/proposed Council Priority projects include:

- The transformation programme being delivered by Publica;
- Implementation of a decked car park in Cirencester and the associated redevelopment of the Old Memorial Hospital site;
- The review and implementation of revised waste and recycling services;
- Funding increased costs of waste and recycling service pending the acquisition of new vehicles;
- Implementation of the Local Plan and the associated introduction of Community Infrastructure Levy;
- Contribute towards the costs of improvements to the Corinium Museum;
- Developing a Masterplan for Cirencester town centre;



- Funding costs associated with the Council's commitment to freeze leisure prices, reduce building control fees and enhance environmental services.

There seems to be too much focus on projects which could perhaps more properly be dealt with through the Neighbourhood Plan for Cirencester, and we can see no reason why projects in Fairford should not also be included within this list. These could potentially include (in addition to priorities already identified, such as land for allotments and a new burial ground, which may otherwise need to wait for contributions from CIL from future housing development):

- Progressing of Conservation Area Appraisal and Management Plan for Fairford (which has not yet been done for Fairford, despite the statutory requirement that every local planning authority "shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance" (s68 of the Planning (Listed Buildings and Conservation Areas) Act 1990) and national guidance that "A conservation area appraisal can be used to help local planning authorities develop a management plan and appropriate policies for the Local Plan" (ref 18a-025-20140306) – also for other historic settlements in the District;
- Drafting and implementation of Article 4 Directions where necessary, to address loopholes created by Permitted Development Rights which undermine the national policy objectives of protecting the historic environment (and indirectly the economic well-being of settlements);
- Improvement and management (in cooperation with Farmor's School) of Farmor's Sports Centre for increased community use;
- Acquisition of land for a new health centre and/or community building at either eastern or western end of Fairford (to replace the community site lost at Keble Fields);
- Acquisition of land and provision on additional car parking north of High Street;
- Acquisition of buildings in town centre to secure future use for retail/community purposes;
- Development of a museum facility for display in Fairford of information and artefacts arising from archaeological investigations relating to recent and older developments in the Fairford area.

There seems to be too much focus on Cirencester – There is a need for more comprehensive strategy embracing objectives to support the role of all principal settlements in the District and ensure sustainability of these, i.e. not just as dormitory towns for commuters to elsewhere - (Ref Appendix A)

We note that Cirencester has recently been designated as a Neighbourhood Plan (some 5 years after Fairford), but we have never had the cooperation on the development of a 'Master Plan' that is currently being progressed for Cirencester. We also note the concern expressed about the issue of "how both Councils will support and deliver their separate but complementary plans" (Appendix A, p4). There would seem to be a danger of duplication of effort and inefficient use of resources on something that is properly a matter for the Cirencester Neighbourhood Plan (in accordance with NPPF para 21), although enhanced support for the latter from CDC would no doubt be welcome, as it would on the revised draft Fairford Neighbourhood Plan.



There is also a good case for the development by CDC of an economic strategy for the District (as, for example, Vale of White Horse have done) incorporating all the Principal Settlements. This should address imbalances between the location of housing and employment which currently undermine the sustainability of policies such as those on affordable housing, in terms of ease of access, benefits to the vitality/viability of settlements and the environmental impacts of commuting. This clearly requires resources.