

Meeting: Council **Date:** 4th November 2021.

Wards affected: Mainly Churston with Galmpton, but also Goodrington with Roselands, St Marys with Summercombe and Berry Head with Furzeham. Indirect effect upon all Wards (see report).

Report Title: Application to Form a New Neighbourhood Forum and Area for Broadsands, Churston and Galmpton (BCG).

When does the decision need to be implemented? By 6th December 2021 (13 weeks from receipt of application).

Cabinet Member Contact Details: Mike Morey, Cabinet Member for Infrastructure, Environment and Culture

Director/Assistant Director Contact Details: David Edmondson Divisional Director, Planning, Housing and Climate Emergency.

1. Purpose of Report

- 1.1 An application has been submitted to Torbay Council as the Local Planning Authority, to create a new Neighbourhood Area and Forum comprising the villages of Broadsands, Churston and Galmpton and surrounding areas (referred to below as BCG Area and Forum). The proposed new Neighbourhood Area consists of all parts of the current Brixham Peninsula Neighbourhood Plan Area which are not within the administrative boundaries of Brixham Town Council.
- 1.2 If the application is agreed, a new Neighbourhood Area and Neighbourhood Forum would be created covering Broadsands, Churston and Galmpton and surrounding areas. Brixham Town Council would remain the neighbourhood planning body ('qualifying body') for the Brixham Town Council administrative area.
- 1.3 A copy of the application and proposed neighbourhood area boundary are included at Appendix 1.

2. Reason for Proposal and its benefits

We want Torbay and its residents to thrive.

We want Torbay to be a place where we have turned the tide on poverty and tackled inequalities; where our children and older people will have high aspirations and where there are quality jobs, good pay and affordable housing for our residents.

We want Torbay to be the premier resort in the UK, with a vibrant arts and cultural offer for our residents and visitors to enjoy; where our built and natural environment is celebrated and where we play our part in addressing the climate change emergency.

- 2.1 The proposals in this report help us to deliver this ambition by giving the residents of Broadsands, Churston and Galmpton a greater say in planning proposals in their area. At present the Neighbourhood Planning body for the area is Brixham Town Council, however local residents wish to be separate from the Town Council. Many volunteers have worked tirelessly on the preparation of Neighbourhood Plans.
- 2.2 As set out in the main report below, the Bay-wide housing shortage means that planning decisions will still need to be determined on the basis of the Presumption in Favour of Sustainable Development. The neighbourhood planning framework does not have the power to set a strategic housing level for the area or establish a five- or three-year supply outside of the Local Plan's strategic framework. This situation will endure until the Local Plan is updated. This could lead to community frustration, particularly given the determination and endeavour of many involved with neighbourhood planning.

3. Recommendation(s) / Proposed Decision.

- 3.1 That a new Neighbourhood Area is created covering Broadsands, Churston and Galmpton.
- 3.2 That the area is amended in accordance with Option B in Appendix 2 that, amends the northern boundary of the proposed new Neighbourhood Area to be contiguous with the 2019 Ward Boundary amendments for Churston with Galmpton, to the east of Dartmouth Road (i.e. to exclude Saltern Road, which is now in Goodrington with Roselands Ward).
- 3.3 That the Broadsands Churston and Galmpton (BCG) Neighbourhood Forum be designated as the Neighbourhood Planning body ("Qualifying Body") for the Neighbourhood Area approved in 3.1 and 3.2 of this report.
- 3.4. That, as a result of 3.1, Brixham Town Council becomes the Qualifying Body for the "parished" area of the town of Brixham only and no longer covers the remaining area of the previously approved Brixham Peninsula Area, with the amended boundary to the area approved as shown in Appendix 2 as "Furzeham with Summercombe" and "St Peter's with St Mary's".
- 3.5 That, as a result of 3.2, the Paignton Neighbourhood Area be amended as shown in Appendix 2 to include the area of Saltern Road up to the boundary between the Goodrington with Roselands ward and the Churston and Galmpton ward
- 3.6 That the Council request that the Forum's Constitution be amended as follows;
 - i) to ensure that Forum executive committee members follow the same Code of Conduct as elected Torbay Council Members,

ii) to undertake to publish Minutes of forum meetings within a reasonable period,

iii) that Section 7.1 be amended to an absolute minimum of 8 members in attendance for quorum, with the amended text reading

“7.1 For Forum meetings held in public a quorum shall be an absolute minimum of 8 members or 5% of the membership where that would be higher, meeting together at a properly convened and constituted meeting or replying to a properly authorised circular to, or ballot of members.”

3.7 That the Council request for clarity that paragraph 3.1.1. of the Forum’s constitution be amended to read: “To **prepare** the Neighbourhood Plan for the Broadsands, Churston and Galmpton Neighbourhood area and to decide how it will be monitored and reviewed, including frequency of review.”

Appendices

Appendix 1: Application including submitted Neighbourhood Area boundary.

Appendix 2: Alternative Neighbourhood Area boundaries considered (see main report).

Appendix 3: Summary of consultation representations received.

Appendix 4: Neighbourhood Development Plan “Road Map”.

Background Documents

Consolidated version of the Neighbourhood Planning Regulations 2012 (as amended).
Regulations 5 and 8 are the most relevant sections.

National Planning Policy Framework.

Online Planning Practice Guidance.

Brixham Peninsula Neighbourhood Plan

Supporting Information

1. Introduction

- 1.1 Torbay has placed great emphasis on Neighbourhood Planning and has bay wide Neighbourhood Plan coverage. Neighbourhood Plans, along with the Torbay Local Plan form the legal starting point for determining planning applications. Neighbourhood Plans are prepared by Neighbourhood Forums and a great deal of voluntary work goes into their preparation.
- 1.2 The area subject to the BCG application is currently within the Brixham Peninsula Neighbourhood Plan Area. Brixham Town Council is currently the neighbourhood planning body (The “Qualifying Body”) for the whole of the Brixham Peninsula area, including the villages of Broadsands, Churston and Galampton. The Neighbourhood Plan Area was approved by Torbay Council in December 2012 and renewed for a further five years in December 2017 and therefore remains active until December 2022. The Brixham Peninsula Neighbourhood Plan was “made” by Torbay Council in June 2019, following referendum in May 2019.
- 1.3 Torbay Council has received an application to split the Brixham Peninsula into a new Broadsands, Churston and Galampton (BCG) area and forum; with Brixham Town Council remaining the qualifying body for the Brixham Town Council’s administrative area.
- 1.4 When considering an application for a neighbourhood area, the LPA must take into account the desirability of: “Designating the whole of the area of a parish council as a neighbourhood area; and Maintaining the boundaries of existing neighbourhood areas” (Section 61G(4), of the Town and Country Planning Act 1990). The LPA also must consider whether the proposed area is appropriate (section 61G(5), TCPA 1990).
- 1.5 Paragraph 035 Reference ID: 41-035-20161116 of the online Planning Practice Guidance (PPG) says that
 - The LPA should take into account the relevant body’s statement explaining why the area applied for is considered appropriate to be designated as such.
 - Except in parished areas, where they are required to designate the whole area applied for, an LPA can refuse to designate the specific area applied for if that area is not considered appropriate. Where it does so, the LPA must give reasons. Some or all of the area applied for must form part of one or more designated neighbourhood areas.
 - When a neighbourhood area is designated, the LPA should avoid pre-judging what a qualifying body may subsequently decide to put in its draft neighbourhood plan or Order. It should not make assumptions about the neighbourhood plan or Order that

will emerge from developing, testing and consulting on the draft neighbourhood plan or Order when designating a neighbourhood area.

- 1.6 As set out in the supporting application for a new BCG Area and Forum, members of the proposed Forum feel that their interests would be better represented by a separate Forum, rather than by Brixham Town Council. They argue that the three villages and their environs have a distinct and more rural character to the other towns within Torbay, including Brixham. As residents of the BCG Villages do not come under the Town Council's jurisdiction there is a strong democratic argument for them to be able to form their own Neighbourhood Plan area and Forum.
- 1.7 A new Forum will be a consultee on planning applications. There will be cross boundary issues where it is appropriate to seek the views of more than one Neighbourhood Planning body e.g. for applications close to an area's border. This situation already exists elsewhere and is not a reason to resist designation.
- 1.8 The Neighbourhood Forum has also indicated that it will prepare a new Neighbourhood Plan to replace the Brixham Peninsula Neighbourhood Plan for the BCG area. Whilst the Neighbourhood Plan for the BCG may well draw heavily upon the existing Brixham Peninsula Neighbourhood Plan, it will need to be considered as a new plan. A key and understandable concern of Forum Members is to achieve a five year housing land supply, and therefore regain local control over planning decisions. This will not be easily achievable, for reasons set out below.
- 1.9 The existing Brixham Peninsula Neighbourhood Plan would remain in place for the whole of the former Brixham Peninsula, but would in time be superseded by new Neighbourhood Plans for the BCG area and Brixham Town.

Consultation

- 1.10 Torbay Council consulted on the proposed Area and Forum in accordance with the legal requirements under the Neighbourhood Planning Regulations. Consultation ran between 6th September and 18th October 2021. The consultation received 31 representations, of which 25 expressed support for the creation of the BCG Forum. In addition, broadly supportive comments were received from Brixham Town Council and Natural England. Brixham Town Council, as the current Neighbourhood Planning Body made a formal response on 14th October 2021. This states that: *"While the Town Council is saddened at the villages actions, it acknowledges the importance of the democratic rights of the communities....The Town Council does not wish to present any objection to the villages request for designation. It is our duty to openly work with all stakeholders and neighbouring villages while representing the residents of Brixham to ensure a robust neighbourhood plan is maintained"*
- 1.11 The Town Council also expressed its desire to carry on as the Neighbourhood Planning Body for the town of Brixham. This matter was covered as part of the BCG Forum advertisement and does not need to be readvertised.

- 1.12 There were, however, four objections to the proposed Forum. These raise the issue of cross-boundary relations between the Forum areas, some of the Broadsands community identify as being part of Paignton (i.e. questioning the appropriateness of the area covered). Some representations expressed a lack of confidence in the proposed members of the Forum.
- 1.13 These issues are dealt with below. Officers consider that they are not a reason for refusing Forum status, but there is a case to request amendments to the draft constitution to address objectors' concerns.

Housing Supply

- 1.14 Government planning guidance is that LPAs should avoid prejudging the content of neighbourhood plans orders when considering Forum and Area applications. Having been "made" in June 2019, all of the Neighbourhood Planning bodies are looking to update their Neighbourhood Plans. The BCG Forum has expressed a wish to take an updated Neighbourhood Plan to referendum in 2022. This is not considered by Officers to be realistic, as neighbourhood Plans have to be written, undertake two rounds of consultation, independent examination and (if necessary) modification prior to referendum. The preparation of a new Neighbourhood Plan could take several years to achieve. A diagram showing the stages of preparing a neighbourhood plan is included at Appendix 4 for information.
- 1.15 Neighbourhood plans are not the strategic plan for the area and cannot set a housing requirement. Nor can they propose less development than is set out in the Local Plan or undermine strategic priorities. Despite the government's vaunted localism agenda, the planning system in the UK is very top down and driven by non-statutory and secondary legislation mechanisms aimed at boosting housing supply, even if this is against the wishes of local communities as expressed in recently made neighbourhood Plans. It remains to be seen whether changes to the former MHCLG, now the Department for Levelling Up Housing and Communities (DLUHC) presage a change to this approach.
- 1.16 The Torbay Local Plan is deemed "out of date" by the tests set in the National Planning Policy Framework (NPPF), due to the housing shortfall (of 813 dwellings since 2012), the lack of five-year land supply and failure against the Housing Delivery Test. Until the Local Plan is updated, it will not be possible for Neighbourhood Plans to demonstrate that they contain policies and allocations to meet its identified housing requirement.
- 1.17 In the absence of an agreed Bay-wide housing requirement, it will not be practical to provide a clear housing target to the neighbourhood plan areas. The starting point for a minimum Bay-wide requirement is the government's Standard Method local housing need figure. At October 2021 this stands at 559 dwellings a year, but is likely to rise in 2022 due to house price inflation. Torbay has to add a 20% buffer to this when calculating its five-year supply figure, making a requirement for 671 dwellings a year. The Brixham Peninsula

Neighbourhood Plan area is the most constrained area of Torbay, due to the proximity of the South Hams SAC and Greater Horseshoe Bat sustenance zone, AONB and road capacity issues at Windy Corner. For this reason, the Torbay Local Plan 2012-30 sets out a constrained level of growth for the south of Torbay. Officers have expressed concern about the achievability of the standard method level of housing growth in Torbay, and there are sound planning reasons for pursuing a constrained level of growth in the south of Torbay. However, the level of requirement for neighbourhood planning areas cannot be set prior to the Local Plan Update being found sound at Examination

- 1.18 The current Brixham Peninsula Neighbourhood Plan makes provision for 685 dwellings between 2012-30, of which 373 have been completed (at April 2021). The bulk of these came from Sharkham Village and Wall Park Holiday Park in Brixham. The approval at appeal of 373 dwellings at Inglewood (P2017/1133), which is within the proposed BCG area is likely to mean that the Brixham Peninsula's housing target in the Torbay Local Plan 2012-30 is comfortably met. However, it cannot follow that no other housing sites will be required in either the BGC Area or Brixham Town Centre. As a minimum it would be expected that existing allocated sites in the BPNP will be rolled forward; but overreliance on brownfield sites may open the door for greenfield proposals if the brownfield sites do not deliver, resulting in a shortfall. As noted there is a Bay wide housing shortfall. Additional greenfield sites are being actively promoted for development both in the BCG Area and Brixham Town Council Area (with a current application at St Marys Campsite). Development pressure is also expected to arise in the Brixham urban fringe around Monksbridge, which is part of the BCG area.
- 1.19 On this basis Neighbourhood Plans will not be able to enjoy full protection (as afforded by paragraph 14 of the NPPF), until the Local Plan is updated. Even if an independent examiner were persuaded to recommend approval and the Council made neighbourhood plans following referendum; they are unlikely to be accorded full weight by the Planning Inspectorate until the Bay wide housing issue is resolved.
- 1.20 Planning proposals will still be subject to the application of the Presumption in Favour of Sustainable Development. The development plan (i.e. local and neighbourhood plan) will remain the starting point for decision making, but the Presumption will be a material consideration operating a "tilted balance" in favour of granting housing applications.
- 1.21 This issue is important but is not in itself a reason to refuse Forum or Area status.

Neighbourhood Area Boundaries and area identity.

- 1.22 Any area, however drawn, may result in cross-boundary issues where it is legitimate to take the views of the adjacent neighbourhood planning body. This could arise, for example if areas on the Brixham Urban Fringe within the BCG Area were to be proposed for development; in such cases it would be reasonable to seek the views of both the Forum and Town Council.

- 1.23 Several other boundaries have been considered by officers as set out in Appendix 2. Option (A) is to keep the submitted boundary, which adheres to the existing neighbourhood Area boundary with Paignton to the North, but simply splits the existing Brixham Peninsula. However, due to Ward boundary changes in 2019, a small amount of the Goodrington with Roselands Ward at Saltern Road, is in the BCG area. It is recommended that this should become part of Paignton Neighbourhood Plan area in order to avoid a very small part of Goodrington with Roselands Ward being included in the otherwise wholly Churston with Galmpton Neighbourhood Plan area. This is shown as Option (B) and is recommended by officers as a minor amendment to the proposed area. Whilst this would mean that a small number of homes will fall under the BPNP despite being within the Paignton Neighbourhood Area in the short term; this small anomaly will be rectified as the areas update their Neighbourhood Plans. The area in question is not expected to be subject to major planning applications.
- 1.24 Another option, shown as Option (C), would be to reduce the size of the area to cover the discrete villages of Galmpton and Churston and to move the Broadsands area into Paignton Neighbourhood Forum area. This could be achieved by placing the boundary between Paignton and BGC Neighbourhood Area along the rear of Tor Close around the edge of the Common, behind Brunel Road and Lower Fowden. There may also be a case to remove the Inglewood area from the Forum boundary, since this area has outline planning permission and when developed it will relate to White Rock phase 1. However, the Inglewood developers have supported the creation of a BCG Forum.
- 1.25 As noted, some representations have indicated that the residents in the north of the proposed BCG area consider themselves as living in Paignton, and the objections to the BCG designation appear to come from this area (see below). Reducing the area would therefore resolve a main area of contention. However, this option would represent a significant change in NP boundaries in this area, and it may be necessary to create a fairly arbitrary line between Broadsands and Churston. Conversely, the current boundary on Dartmouth Road between Hookhills and Broadsands, does represent a clear demarcation between the more built up area to the West of Dartmouth Road and the distinct settlements to the east (albeit one not reflected by ward boundaries). On this basis, option (C) is not recommended by officers.
- 1.26 Finally, the new Forum boundary could be extended to cover the entire Ward of Churston with Galmpton, as per the 2019 boundaries. This is shown as Option (D). This would include the Hookhills and White Rock areas within an enlarged BCG Neighbourhood Forum Area. Although designating along electoral Ward lines would be consistent with other Neighbourhood Areas in Torbay, there has been no consultation response suggesting this scenario from Paignton Neighbourhood Forum or residents of Hookhills. Moreover, this proposal would not necessarily reflect the villages' view of themselves as a separate identity to the built-up area of Paignton. Hookhills relates to Paignton and the boundary

between it and Goodrington with Roselands is not distinct. Option (D) is not recommended by officers.

Confidence issues and alleged behaviour of the predecessor “Forum” representatives.

- 1.27 A small number of representations express a lack of confidence in the new Forum and raise a concern as to a lack of transparency. These appear to relate primarily, though not solely, to a planning dispute, however officers are clear that this is a separate matter to this Forum and Area applications. The BCG application is being led by the two Torbay Council Ward Members, who have a natural role in their capacity as Councillors to promote the interests of neighbourhood planning in their area.
- 1.28 It is noted that there are no published Brixham Neighbourhood Plan minutes posted online after August 2018, despite the period 2018-19 coinciding with busy neighbourhood planning activity. Officer’s will follow up on this matter with Brixham Town Council separately as it does not concern these applications other than ensuring that this forum is transparent as the community expects.
- 1.29 Whilst these concerns are taken seriously, they can be addressed by requesting that Forum post-holders or those representing the Forum at meetings etc. agree to the same Code of Conduct governing council Members and officers and ensuring there is a sufficient quorum attendance. The submitted constitution states for instance “8 members or 5% whichever is less” but that could give rise to 1 member being quorum if there were 21 members. The reference to ‘whichever is less’ suggests that was not the intention and clarity is proposed with an amendment to 7.1 of constitution. Agreeing to the code of conduct would also ensure that Forum representatives took equalities matters fully into account. Note that this would not preclude them from promoting land which they have an interest in, so long as that interest is properly declared; as indeed it was in the aforementioned case. In addition, it is recommended that the Forum’s Constitution undertakes to publish minutes of public meetings online within a reasonable period. The Government has proscribed neighbourhood forums’ roles and powers. The Neighbourhood Plan, when published, will be subject to independent examination, referendum and consideration by Torbay Council as the Local Planning Authority. Accordingly, it is considered proportionate to request that the Forum considers these suggestions, rather than seeking to require them.
- 1.30 Officers emphasise that the above is suggested as a response to the objections received and are not intended to impugn the good faith, or strenuous efforts for the community, of those involved in Neighbourhood Planning or promoting the BCG Forum.

2. Options under consideration

- 2.1 Different options are set out in Section 1 above, along with a discussion of detailed boundary issues. In summary, Officers have considered four boundary options:

(A) The boundary as submitted.

(B) A minor amendment to the northern boundary to move Saltern Road, which is in Goodrington with Roselands, into the Paignton Neighbourhood Area. This is Officers' recommendation.

(C) A more tightly drawn boundary around the villages of Galmpton and Churston. This is not recommended by Officers.

(D) To make the Neighbourhood Area the same as Churston with Galmpton Ward. This is not recommended by officers.

2.2 Separate to the boundary matters, there is an option for the LPA to refuse to agree to the creation of a new Forum and Area on the grounds that it will not help Torbay meet its housing requirements, and may delay preparation of the Local Plan update due to resources. However, Torbay Council has committed to empowering the community through Neighbourhood Planning and there is a strongly supported wish for the BCG community to form a separate Forum and Area from Brixham Town Council and therefore this is not recommended.

3. Financial Opportunities and Implications

3.1 As a new Forum and Area, funding from Locality is available directly to the forum to support preparation of the Neighbourhood Plan. The costs of preparing a neighbourhood plan including council support and the required referendum on the plan will have a financial impact, although some of this cost maybe be offset from central government funding. Once the value and timing of these costs can be estimated the council will need to identify the funding.

3.2 The LPA has a duty to provide support to the new Forum. To support that Duty the Government do provide fixed levels of grant funding to the LPA. The previous period of extensive planning work with the Neighbourhood Forums coincided with a period where less development plan work was underway. Spatial Planning is not resourced to support neighbourhood planning to that same extent alongside the Local Plan update, and taking resources from one will necessarily impact upon the other. The support provided by the LPA to the forums can vary and previously this included regular attendance at forum meetings and advice on the development of planning policies, but with all areas updating their plans the minimum requirements will be to respond to forum consultations, arrange the LPA consultation, prepare committee/council reports, organisation of examinations including procurement of examiners as appropriate and managing any modifications process that follows, and arranging referendums.

3.3 Neighbourhood Plans are subject to independent examination and referendum. There is expense involved with appointing an Examiner. There is the cost of a referendum on a plan

proposal, if the referendum is not carried out in conjunction with an existing election it will cost in the region of £15K-£20K. Costs can be reduced by combining with an existing election. The Forum have indicated that they intend to go to referendum in 2022, but officers advice is that this timescale is too ambitious. However, the additional costs of Neighbourhood Plan examination etc. are not reasons to refuse the creation of an Area or Forum.

4. Legal Implications

- 4.1 Neighbourhood Areas and Forums are governed by the Localism Act 2011 and Neighbourhood Planning Regulations (2012 as amended). The process of advertising and considering forum and area applications are set out in Regulations 6 and 9 of the Regulations, and considered in more detail above.
- 4.2 A key role of the Forum will be to carry out an update of the Brixham Peninsula Neighbourhood Plan insofar as it relates to the BCG villages. Neighbourhood Planning legislation governs the preparation and examination of neighbourhood plans and the various steps required in that process. Appendix 4 sets out this roadmap.

5. Engagement and Consultation

- 5.1 As noted, the council consulted on the proposed area and Forum status between 6th September and 18th October 2021, in accordance with the requirements of Sections 61F and G of the Town and Country Planning Act 1990 (as amended) and Regulations 5 to 11 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 5.2 People who had previously made representations to the Neighbourhood Plan in 2017 and 2019 were emailed directly, and the council also sent out a general newsflash and press release. The council also sent out messages and reminders on its social media platforms. A summary of representations received formally by the Council is set out at Appendix 3.
- 5.3 The proposed Forum has also carried out its own consultation prior to applying for area and forum status, and a consultation statement setting out their reasons for applying is contained at Appendix 1.

6. Purchasing or Hiring of Goods and/or Services

- 6.1 No direct impact. The LPA may commission individual or joint research to support neighbourhood planning, but this is a separate matter from the current proposal.
- 6.2 The Council will be required to procure an examiner for the Neighbourhood Plan. For this area alone it would not be at the same scale as the previous round of examinations and an appropriate process will be determined in due course ahead of the submission of a plan from the forum.

7. Tackling Climate Change

- 7.1 The application for a Neighbourhood Area and Forum status does not directly affect the Climate Emergency. However, the Forum through its work can promote a range of sustainability objectives. For example policies in the existing Neighbourhood Plan promote the reuse of urban brownfield sites and encourage sustainable design and construction.

8. Associated Risks

- 8.1 The main risks are outlined in the main report. The key risk is of community disillusionment about the powers of neighbourhood plan, and the time it takes to prepare them, in the face of the government's desire to boost housing supply. Officers have responded to the forum seeking a 2022 referendum to say that it is not considered possible due to the time needed to draft a compliant plan, undertake the appropriate consultations and make appropriate modifications, and to organise the examination and referendum.
- 8.2 Officers have considered the objections raised to the Forum designation, and possible remedies in terms of amending the area boundary. For the reasons set out in the main report, Officers consider that the creation of an Area and Forum with the slight boundary change and constitutional amendment requested would reasonably address the concerns raised in the objections.

9. Equality Impacts - Identify the potential positive and negative impacts on specific groups

- 9.1 The purpose of the Forum is stated to be "To continue to promote and improve the social, economic and environmental wellbeing of the Broadsands, Churston and Galmpton Neighbourhood area" (paragraph 3.19). The impact of the Forum depends upon the policies it pursues in practice, particularly in relation to the preparation of a Neighbourhood Plan. These cannot be pre-judged at this stage. Requesting the Forum members to be subject to Torbay Council Member Code of Conduct would require them to have regard to equalities duties.

10. Cumulative Council Impact

- 10.1 As outlined above. These would include legal, procurement and governance services.

11. Cumulative Community Impacts

- 11.1 As outlined above.