



EXMOOR
NATIONAL PARK

EXMOOR NATIONAL PARK AUTHORITY
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20 May 2020

EXMOOR NATIONAL PARK AUTHORITY

To: All Members of the Exmoor National Park Authority

A meeting of the Exmoor National Park Authority will be held via Lifesize Video Conferencing software on **Tuesday 2 June 2020 at 10.00am.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each to ask questions, make statements, or present a petition relating to any item relevant to the business of the Authority or relating to any item on the Agenda. Anyone wishing to ask questions should notify the Corporate Support Officer by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact Judy Coles on 01398 322250 or email jcoles@exmoor-nationalpark.gov.uk).

Please be aware that this is a public Authority Meeting and will be **audio and video recorded**. We will make the recordings available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use Facebook and Twitter or other forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website www.exmoor-nationalpark.gov.uk).

Sarah Bryan
Chief Executive

AGENDA

The first section of the meeting will be chaired by Mr R Milton, the Chairperson of the Authority. If the Chairperson is absent, the Deputy Chairperson shall preside.

1. Apologies for Absence

2. Declarations of Interest/Lobbying of Members/Unaccompanied Site Visits

Members are asked to declare:-

- (1) any interests they may have in relation to items on the agenda for this meeting;
- (2) any lobbying by anyone concerned with a planning application and any unaccompanied site visits where contact has been made with any person concerned with a planning application.

(NB. When verbally making these declarations, members are also asked to complete the Disclosures at Meetings form – attached for members only).

3. Chairperson's Announcements

4. **Minutes** (1) To approve as a correct record the Minutes of the meeting of the Authority held on 14 May 2020 (Item 4).

- (2) To consider any Matters Arising from those Minutes.

5. **Public Speaking:** The Chairperson will allow members of the public to ask questions, make statements, or present a petition. Questions of a general nature relevant to the business of the Authority can be asked under this agenda item. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

Agenda items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting will be chaired by Mr S Pugsley (Deputy Chairperson (Planning)). If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the Authority shall preside.

6. **Development Management:** To consider the report of the Head of Planning and Sustainable Development on the following:-

Agenda Item	Application No.	Description	Page Nos.
6.1	6/27/20/105	Proposed replacement of 5 no. windows and 1 no. external door. Retrospective – The Culbone, Porlock to Lynton Road, Porlock	1 – 10
6.2	GDO 20/05	Prior notification for the proposed partial demolition and replacement of existing barn (30.48m x 9.14m) together with erection of extension (27.43m x 1.52m) – Driver Farm, Simonsbath, Minehead	11 - 17

7. **Site Visits:** To arrange any site visits agreed by the Committee (the reserve date being Friday 3 July (am)).
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The remaining section of the meeting will be chaired by Mr R Milton, Chairperson of the Authority. If the Chairperson is absent, the Deputy Chairperson of the Authority shall preside.

8. **Internal Audit Review:** To consider the report of the Internal Auditor and the Chief Finance Officer (Item 8)
9. **Members' Allowances Scheme:** To consider the report of the Chief Finance Officer (Item 9).
10. **Annual Treasury Management Report:** To consider the report of the Head of Finance & Operations (Item 10)
11. **Any Other Business of Urgency**

Further information on any of the reports can be obtained by contacting the National Park Authority at the address and telephone numbers at the top of the agenda. Details of the decisions taken at this meeting will be set out in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained from Judy Coles, Corporate Support Officer, at Exmoor House.

ITEM 4

EXMOOR NATIONAL PARK AUTHORITY

MINUTES of the Meeting of the Exmoor National Park Authority held on Thursday, 14 May 2020 at 10.00am via Lifesize Video Conferencing software.

PRESENT

Mr R Milton (Chairperson)	
Miss A V Davis (Deputy Chairperson)	
Mr S J Pugsley (Deputy Chairperson (Planning))	
Mrs L Blanchard	Mrs F Nicholson
Mr M Ellicott	Mr J Patrinos
Mr N Holliday	Mr M Ryall
Mr J Holtom	Mr B Revans
Mr M Kravis	Mrs E Stacey
Mrs C M Lawrence	Mr N Thwaites
Mr E Ley	Mr V White

Apologies for absence were received from Mr R Edgell, Mr J Hunt, Mr P Pilkington and Mrs S Takle

128. DECLARATIONS OF INTEREST:

In relation to Item 6.3 – Application No. 6/13/19/111 - Proposed demolition of part of the stone boundary wall, creation of vehicular hardstanding to form parking area and the erection of timber post and rail fencing surrounding the vehicular hardstanding. Retrospective (Householder) – The Old Stables, Court Farm, Exford, Somerset. Mr M Ellicott declared a personal interest as Chairman of Exford Parish Council, however advised that he did not take part in the discussions which took place at the Parish planning meeting and had abstained from voting, and therefore intended to take part in the Authority discussions and to vote on this application.

In relation to Item 6.4 – Application No. 6/13/20/101 – Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for non-material amendment to application reference 6/13/19/104 to rotate shed through 180 degrees (NMA – Full) – Exmoor National Park Field Services Depot, Exford, Minehead. Mr M Ellicott declared a personal interest as Chairman of Exford Parish Council, however advised that he did not take part in the discussions which took place at the Parish planning meeting and had abstained from voting, and therefore intended to take part in the Authority discussions and to vote on this application.

129. CHAIRPERSON'S ANNOUNCEMENTS:

- Due to the Covid-19 emergency, the Authority will be holding meetings via Lifesize Video Conferencing software for the foreseeable future. These meetings will be held in accordance with Standing Orders and the Formal Meetings Protocol.
- It is proposed that voting at all meetings held via Lifesize Video Conferencing will be done verbally rather than by a show of hands.

- In line with Government advice on the public's ability to travel further for exercise, with effect from 13th May, the Authority has reopened its public toilets and carparks – with measures in place to ensure social distancing and responsible behaviour. However, staff will continue to work from home where possible and our National Park Centres will remain closed.

130. RESOLUTION: To resolve that all motions, including all Authority and planning items, shall be determined by a verbal vote not a show of hands in accordance with Standing Order 8.1 until otherwise resolved by the Authority.

131. MINUTES

- Confirmation:** The **Minutes** of the Authority's meeting held on 3 March 2020 were agreed and signed as a correct record.
- Matters arising:** There were no matters arising.

132. PUBLIC SPEAKING: See Minute 133,134 and 135 for details of public speakers.

Items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting was chaired by Mr S J Pugsley, Deputy Chairperson (Planning).

DEVELOPMENT MANAGEMENT

Mrs F Nicholson and Mrs E Stacey did not vote on this item.

133. Application No. 6/20/20/102

Location: Throat Farm, Wheddon Cross, Minehead

Proposal: Proposed installation of 6.2kw Roof Mounted PV array to agricultural barn to the south of Throat Farm (Full)

The Authority considered the **report** of the Head of Planning and Sustainable Development.

Public Speaking:

- (1) Mr R O'Hare, Neighbour (written submission tabled)
- (2) Mr R Wight, Applicant

RESOLVED: To grant planning permission subject to the conditions set out in the report.
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Mr S Pugsley, Deputy Chairperson (Planning), left the meeting due to a technical difficulty and Miss A V Davis, Deputy Chairperson, took over as Chair for this item.

Mr R Milton, Mr S Pugsley and Mr N Thwaites did not vote on this item as they were not present for the duration of the item.

134. Application No. 6/34/20/102

Location: Combe House, Jubilee Terrace, Timberscombe, Minehead

Proposal: Proposed replacement of windows and doors with double glazed units (Householder)

The Authority considered the **report** of the Head of Planning and Sustainable Development.

Public Speaking:

(1) Mr C Farmer, Applicant

RESOLVED: To refuse planning permission for the reasons set out in the report.

The meeting closed for recess at 11.50am and reconvened at 11.58am.

Mr S Pugsley, Deputy Chairperson (Planning), left the meeting due to a technical difficulty and Miss A V Davis, Deputy Chairperson, took over as Chair for this item.

Mr M Kravis joined the meeting.

Mr S Pugsley did not vote on this item as he was not present for the duration of the item.

135. Application No. 6/13/19/111

Location: The Old Stables, Court Farm, Exford, Somerset

Proposal: Proposed demolition of part of the stone boundary wall, creation of vehicular hardstanding to form parking area and the erection of timber post and rail fencing surrounding the vehicular hardstanding. Retrospective (Householder)

The Authority considered the **report** of the Head of Planning and Sustainable Development.

Public Speaking:

(1) Ms J Toop, Neighbour (written submission tabled)

(2) E Toop, Neighbour (written submission tabled)

(3) XL Planning Ltd on behalf of Mr & Mrs Godwin, Applicants (written submission tabled)

RESOLVED: To grant planning permission subject to the conditions set out in the report.

136. Application No. 6/13/20/101

Location: Exmoor National Park Field Services Depot, Exford, Minehead

Proposal: Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for non-material amendment to application reference 6/13/19/104 to rotate shed through 180 degrees. (NMA – Full)

The Authority considered the **report** of the Head of Planning and Sustainable Development.

RESOLVED: To approve the non-material amendment for the reasons set out in the report.

Mr M Kravis did not vote on this item as he was not present for the duration of the item.

137. Application No. 6/9/20/104LB

Location: Exmoor National Park Authority, Exmoor House, Dulverton

Proposal: Application under Regulation 3 of the Town and Country Planning

General Regulations 1992 for listed building consent for the proposed removal of one window pane and replace with an 'Extractor fan'

The Authority considered the **report** of the Head of Planning and Sustainable Development.

RESOLVED: To grant listed building consent for the reasons set out in the report.

138. SITE VISITS: There were no site visits to arrange.

The remaining section of the meeting was chaired by Mr R Milton, Chairman of the Authority.

139. ANNUAL GOVERNANCE REVIEW 2019/20

The Authority received the **report** of the Solicitor and Monitoring Officer and Chief Finance Officer

The Authority's Consideration

The meeting noted that Simon Clarey continues to be the Monitoring Officer for the Authority and not Hazel Union as stated on Page 9 of the report.

RESOLVED:

- (1) To approve the Annual Governance Review.
- (2) To approve the Annual Governance Statement as set out in the Appendix to the report for inclusion with the Annual Accounts for 2019/20.

Mr S Pugsley did not vote on this item as he was not present for the duration of the item.

140. EXTERNAL AUDIT PLAN FOR THE YEAR ENDING 31 MARCH 2020:

The Authority received a presentation from the external auditors and considered the **report** of the Chief Finance Officer.

RESOLVED: To receive the External Audit Plan for the year ending 31 March 2020.

141. ANY OTHER BUSINESS OF URGENCY: There was none.

The meeting closed at 1.06pm

(Chairperson)



AGENDA ITEMS RELATING TO THE AUTHORITY'S ROLE AS SOLE LOCAL PLANNING AUTHORITY FOR THE NATIONAL PARK AREA INCLUDING DETERMINATION OF PLANNING APPLICATIONS

This section of the meeting will be chaired by the Deputy Chairperson (Planning).
If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the
Authority shall preside.

2 June 2020

**REPORT OF THE HEAD OF PLANNING
AND SUSTAINABLE DEVELOPMENT**

6.1



Committee Report

Application Number:	6/27/20/105
Registration Date:	04-Mar-2020
Determination Date:	10-Apr-2020
Applicant	Rupert Martin
Agent:	Kevin Bateman, Bateman Hosegood
Case Officer:	Kieran Reeves
Site Address:	The Culbone, Porlock To Lynton Road, Porlock, TA24 8JW
Proposal:	Proposed replacement of 5 no. windows and 1 no. external door. Retrospective. (Amended description)
Recommendation:	Refusal
Reason for bringing before Authority Committee:	Oare Parish Meeting have a view that is contrary to the recommendation of Officers

Relevant History

No planning history relevant to this application.

Site Description & Proposal

Planning permission is sought for the retention of five uPVC windows and one uPVC door in the property known as The Culbone. The application site consists of a detached commercial building, which is a public house that is currently closed. The site is located to the west of Porlock on the A39 between Porlock and County Gate.

To the west of the building is a large car park, which is accessed from the A39. The site is in an isolated location in the open countryside with one neighbouring property, which is a dwelling on the opposite side of the A39.

The unauthorised windows have replaced three painted timber units in the north eastern elevation that faces the A39 and one in the south eastern gable end of the building. The unauthorised door and remaining unauthorised window have replaced respective timber units in a porch that is attached to the elevation facing the A39. The window in the gable end was inserted in 2017/2018. The remaining windows and door have been installed within the last two years.

6.1

Consultee Representations

Somerset County Council – Consultation response dated 11th March 2020 – It should be ensured that no windows or doors open onto/over the adjoining public highway.

Consultation response dated 28th April 2020 – Previous comments apply.

Porlock Parish Council – No comments received.

Oare Parish Meeting – Support the application. Conscious that natural wood may be considered preferable. However, the windows are sited facing the A39 where they are sprayed with salty water all winter, making wood impracticable - they would only last a couple of years. Also, they are not 'public facing' - nobody would even notice any difference as they drove past.

ENPA Historic Buildings Officer – The pre-amble to Policy CE-S6 (Design and Sustainable Construction Principles) makes clear that timber windows are preferable to upvc. Counter to the planning statement upvc windows are not a sustainable solution. Well maintained timber windows will long outlast upvc windows. There are timber windows on Exmoor that are more than 200 years old, even in exposed locations. Timber windows are also easier to repair, less environmentally harmful to produce and elements can be recycled unlike upvc which generally end up in landfill. I do not agree that the upvc windows will compliment to character of form of this late 19th/early 20th century building which is identified on the historic environment record.

ENPA Wildlife Officer – No ecological concerns.

ENPA Public Rights of Way Officer – Public bridleway WL19/51 passed immediately to the south of the property. The replacement windows are on the road side of the building and are not visible to users of the bridleway. I therefore have no comment to make on this application.

Natural England – Consultation response dated 11th March 2020 – Having reviewed the application Natural England does not wish to comment on this proposal. This development relates to the Exmoor National Park. We therefore defer to you for comments regarding location and wider landscape setting of the development and whether or not it would impact significantly on the purposes of the designation.

Consultation response dated 30th April 2020 – Natural England has previously commented on this proposal and made comments to the authority in our letter dated 11 March 2020. The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal. Should the proposal be amended in a way which significantly affects its impact on the natural environment

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then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Representations

No public representations received in relation to this application.

Policy Context

Exmoor National Park Local Plan 2011 – 2031

GP1 – General Policy: Achieving National Park Purposes and Sustainable Development

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor’s Landscapes and Seascapes

CE-S4 – Cultural Heritage and Historic Environment

CE-S6 – Design and Sustainable Construction Principles

The National Planning Policy Framework (NPPF) is also a material planning consideration.

Planning Considerations

The main material planning considerations in this case are the design and materials of the windows and door, and their impact on the landscape and cultural impact on the street scene.

Design and Materials

Policy CE-S6 of the Exmoor National Park Local Plan 2011 – 2031 requires that construction materials complement the local context through the use of traditional and natural sustainable building materials. The use of locally sourced sustainable building materials are encouraged.

The preamble to the policy sets out that uPVC windows can have much thicker, unmoulded frames than timber, and the designs and detailing are for the most part limited in terms of being effective replacements for traditional timber designs. The Local Plan is clear that the National Park Authority wishes to see the use of timber for window frames as the primary approach to fenestration.

The preamble to the policy also states that alternative materials should only be considered in certain circumstances for non-traditional buildings in areas outside conservation areas.

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The applicant has replaced three windows in the north eastern elevation that face directly towards the A39, together with a further window in the south eastern gable that is very visible to people travelling along the A39 from Porlock. A door has also been replaced and this is, with the remaining unauthorised window, within a porch that is attached to the north eastern elevation facing the A39. All of these new windows and the new door have been constructed from white uPVC and have replaced timber windows and a timber door. The remaining windows and doors in the building are painted timber.

It is Officers view that the new windows and door do not match the overall detailing and finish of the previous windows and door, nor the existing timber windows and doors that remain within the building. The uPVC units have chunkier, unmoulded casements and the glazing bars also lack the detailing and form of the traditional timber units they have replaced. The new windows do not replicate the painted finish of the timber units. Their design and form do not have a character and appearance that complements the building and they are not of the highest quality, as required by Paragraph 4.158 of the Local Plan.

The change in material, design and profile of the replacement windows and door are considered to have an unacceptable, and materially, detrimental impact to the character and appearance of the host building as a result of the unauthorised works. Officers consider that it would be appropriate and proportionate to return timber units to the building. Particularly as the principle of an alternative window and door material in this building is not considered to be achievable under the Local Plan, as set out below.

It is noted that the preamble to Policy CE-S6 does suggest that there are certain circumstances where an alternative form of material may be acceptable. However, the preamble is clear that these certain circumstances must involve non-traditional buildings outside conservation areas. The Culbone is not within a conservation area but it is a traditional building.

The building is not present on the Tithe mapping, but it is on the 1st Edition Ordnance Survey map from the late 19th Century. As such, the building is likely to be approximately 150 years old. The Authority's Historic Buildings Officer has confirmed that the Culbone is identified on the Authority's Historic Environment Record (HER).

Traditional buildings are defined in the Local Plan as "mostly older buildings of solid wall construction built of natural and often local materials (e.g. stone, cob, brick, lime mortar and render). On Exmoor, these usually predate World War II". Given this, The Culbone is considered to be a traditional building and it therefore follows that the certain circumstances for alternative materials set out in the preamble to Policy CE-S6 cannot be considered to apply in this particular case.

The retention of the five uPVC windows and uPVC door would be contrary to the requirements of Policy CE-S6 as the construction material is neither traditional nor

6.1

naturally sustainable. The use of an alternative window and door material is therefore not supported under the Local Plan policies in this case.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) sets out that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The applicant seeks to set out there are “other material planning considerations” in the submitted Planning Statement. It asserts that there is “an economic benefit in reducing maintenance costs for the business whilst improving the social element by enhancing the aesthetics of the building for visitors which will in turn have economic benefits for the wider area”. This is expanded on in the Planning Statement.

There is no evidence before Officers that demonstrates that there are economic or social benefits arising from the installation of five windows and one door that would be to such a level where the clear non-compliance with the Local Plan can be considered to be outweighed. It appears also just as likely that the benefits outlined can be achieved with policy compliant development, comprising timber windows and door.

It is also difficult to see that there would be a “social benefit” as suggested by the applicant. Officers do not agree that the uPVC units have not resulted in an enhancement of the aesthetics of the building, for the reasons set out in this report, and the loss of traditional materials merely erodes the understanding of a place or building.

In addition to the asserted economic and social benefits, the applicant also suggests that this part of the building is subject to constant splashing of road water due to the camber of the road causing water to lie against the kerb adjacent to this part of the building. It is asserted that this water splashing causes the timber windows and door to rot quickly and this means that it is not a sustainable or viable material.

The Historic Buildings Officer has expressed the view that the exposed position by the road will likely lead to a rapid breakdown of the seals to a uPVC window, which will shorten their lifespan and result in the fogging of units, thereby resulting in the full replacement of the window unit as opposed to a timber window, which can have elements replaced.

Given the conflicting views on this matter, Officers consider that only very limited weight can be given to the impact from road water splash from the adjacent public highway on the longevity of windows.

The Historic Buildings Officer also states that counter to the Planning Statement submitted in support of the application, uPVC windows are not a sustainable solution, and well maintained timber windows will long outlast uPVC windows. The Historic Buildings Officer also states that timber windows are also easier to repair, less

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environmentally harmful to produce and elements can be recycled unlike uPVC, which generally end up in landfill.

Paragraph 148 of the National Planning Policy Framework requires that “the planning system should support the transition to a low carbon future in a changing climate”. Exmoor National Park Authority has declared a climate emergency. The scope for individual planning applications to contribute to these initiatives will be dependent on the nature and scale of the development being proposed. This application is relatively minor in this regard. It is also noted that the uPVC windows and door are not considered to be a low carbon alternative to the timber windows and door that they replaced, for the reasons set out in this report. As such, the requirements of Paragraph 148 are not considered to be form a reason for the Local Planning Authority to deviate from the adopted Local Plan policies.

Officers are of the opinion that the application has not provided material planning considerations that indicate that the uPVC windows and door should be retained contrary to the planning policies of the Local Plan.

Impact on Landscape and Street Scene

It is noted that the preamble to Policy CE-S6 specifically states that particular attention will be paid to the fenestration of the principal elevation of any building as well as any elevations which are publicly visible. All of the windows and the door are visible from the public realm, in particular when travelling in either direction along the A39. All five of the windows are visible to people travelling towards the junction with the A39 on the road from Parsonage.

The building’s position in the open countryside on a key arterial road through the National Park means that the building is regularly seen by the local population and visitors to the National Park. It is a well known building that has sat adjacent to this main road for a considerable period of time and it is considered to have a significant contribution to the landscape setting of this key public road. The visible position of the windows and door in the building means that they have caused harm to the street scene and visual amenity. Particularly, when visual reference is given to the uPVC windows and door together with the timber windows and doors that remain within the building, as this emphasises the lower quality of the uPVC units.

When applying great weight to conserving and enhancing landscape and scenic beauty of the National Park landscape, as required by Paragraph 172 of the National Planning Policy Framework, the harmful impact on the street scene and visual amenity that has resulted from the works is sufficient for Officers to conclude that material harm has been caused to the character and appearance of the immediate landscape setting of this key road through the National Park.

Other Matters

Somerset County Council, as the Highway Authority, have advised that no windows or doors can open onto/over the adjoining public highway.

6.1

The map extract provided by SCC indicates that the three windows in the elevation facing the A39 all open over land that is designated as public highway. In addition, the whole porch on that elevation, and the window and door within it, are also on the designated public highway. However, having looked at Google Street View images from 2018, which shows the former timber units, these windows and door previously opened over/onto the public highway. Also, the area of the public highway that the new windows and door open over/onto is a grass verge and not the metalled part of the road. Given that the new windows and door have not changed the situation, and that they do not interfere with the movement of vehicles along the A39, Officers consider that there has not been a detriment to highway safety. This appears to be a matter between the applicant and the Highway Authority.

Human Rights

The provisions of the Human Rights Act 1998 and Equalities Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

The unauthorised uPVC windows and door are considered to be a retrograde step when considering that they have replaced timber windows and door that had a traditional form and finish and were of a higher visual quality than the new uPVC units.

Policy CE-S4 sets out that materials and design elements should complement the local context through the use of traditional materials. uPVC is not considered to be a traditional material and the applicant's submission that timber windows are in a location that would mean that they would deteriorate quickly, together with that the visual appearance of the uPVC units complement the existing building, are given limited weight in this case.

Officers consider that there are no material planning considerations that would direct Officers to approve the application contrary to the Local Plan policies.

Officers have also set out in the report that the impact of the works are considered to be such that there has been material harm to the landscape setting of the A39 and the visual amenity of users of this key arterial road through the National Park, which is used by a significant number of the local population and visitors to the Park.

Taking into account all material planning considerations, Officer conclude that the retention of the five uPVC windows and one uPVC door is contrary to the policies of the adopted development plan and, therefore, it is recommended that retrospective planning permission be refused.

6.1

Recommendation

Refused for the following reason:

1. The application seeks to retain five uPVC windows and one uPVC door in a traditional public house within Exmoor National Park, a building that is present on 1st Edition Ordnance Survey maps from the 19th Century. Policy CE-S6 of the Exmoor National Park Local Plan 2011 - 2031 states that development should utilise traditional and natural sustainable construction materials. The windows and door that the applicant seeks to retain are constructed from a material that is neither congruent with the traditional construction material of windows and doors within the Park and it is not a material that is natural or sustainable. They are not a high quality example of uPVC fenestration and they do not reflect the form and finish of the traditional timber windows and doors that remain within the building, nor do they reflect the form and finish of the windows and door they have replaced. Their installation has caused material harm to the character and appearance of the traditional host building given that when compared to the previous windows and door, the development is a retrograde step. In addition, when taking into account the requirements of Paragraph 172 of the National Planning Policy Framework, the visible position of the unauthorised windows and door, and their incongruent presence within this traditional building, are considered to cause unacceptable harm to the landscape setting of the A39 and the visual amenity of people using this key road through the National Park. The retention of these windows and door would be contrary to Policies GP1, CE-S1, CE-D1, CE-S4 and CE-S6 of the Exmoor National Park Local Plan 2011 - 2031, and the National Planning Policy Framework.

Informatives

Positive and Proactive Statement

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. In this case, the planning objections to the proposal could not be overcome.

Appeal to the Secretary of State

If you want to appeal against your Local Planning Authority's decision then you must do so within 6 months of the date of this notice.

6.1

6.2



Committee Report

Application Number:	GDO 20/05
Registration Date:	30-Mar-2020
Determination Date:	23-Apr-2020
Applicant	Mr W Amos
Agent:	
Case Officer:	Joe White
Site Address:	Driver Farm, Simonsbath, Minehead, TA24 7LH
Proposal:	Prior notification for the proposed partial demolition and replacement of existing barn (30.48m x 9.14m) together with erection of extension (27.43m x 1.52m).
Recommendation:	Prior Approval Not Required
Reason for bringing before Authority Committee:	The application has been made by Exmoor National Park Authority and therefore comes before the Authority Committee for consideration.

Relevant History

GDO 09/16 Prior notification for the installation of an underground tank for the collection of silage effluent – Withdrawn

6/14/82/001 Proposed use of land at Driver Farm, Simonsbath, as a site for a caravan, as described in the plans and drawings submitted – Approved April 1982

Site Description & Proposal

This application is a prior notification application made under the Town and Country Planning General Permitted Development Order and relates to the partial demolition and replacement of an existing barn together with an extension of the barn.

The application site is Driver Farm, which lies north of the B3358, west of Simonsbath. The farm is one of the original farmsteads built by the Knights on Exmoor. The farmstead is depicted on the 1st Edition Ordnance Survey map and is owned by Exmoor National Park Authority. The house was built in 1847 and sits with a courtyard of traditional farm buildings, that lie to the south.

Further south is a large modern farm building and a silage clamp. The access drive to the farmstead passes to the east side of the building group.

6.2

The proposal is to replace existing timber uprights/stanchions within the building, which have failed and caused the roof to drop at its western extent.

The proposal would see the existing failed timber posts replaced with metal posts. The walls and roof covering for the rebuilt part of the building would be replaced with materials corresponding with the existing building, including timber and metal cladding on the side elevations, replacing the existing cladding. The roof would be clad with fibre cement.

The area of the barn to be rebuilt measures approximately 9.14 metres by 30.48 metres (approximately 300 sqm) and is less than half the area of the total existing building.

A relatively small extension is also proposed to the existing barn, including the area proposed to be rebuilt. The extension would be in the form an extension over the eaves of the existing building on its south east side. The roof extension would be mounted on and supported by the existing building uprights/stanchions and provide a covered feed passage along the side of the shed, within the area between the shed and the silage clamp.

Consultee Representations

Exmoor Parish Council – No objection

ENPA Wildlife Officer - Helix Ecology carried out a preliminary bat roost assessment and nesting bird assessment at Driver farm on 20 March 2020. The results of the survey were as follows:

Bats: No evidence of bats was found during the survey, although search conditions were constrained. The shed has low-potential roost features for bats in the form of crevices between overlapping corrugated roofing sheets, and internally on top of supports & roofing timbers. However, the elevation and exposure of the site, and presence of more substantial buildings on site, reduces the likelihood of use of these features by bats.

Birds: The frame of the shed provides nesting potential. A bird nest high up on a supporting timber was likely that of a house sparrow. Wrens, song thrush and pied wagtail are confirmed present on site and all could nest on roof timbers /supports within the shed without leaving obvious evidence of their presence.

Recommendations:

Bats

As potential roost/nest sites will be retained throughout the work in the majority of the structure, and effectively recreated in the repaired shed, no compensatory roost/nest sites are required.

6.2

Due to the opportunistic behaviour of some bats species, including pipistrelles, along with the site's location set within habitats that will support bats, please attach the following informative:

- The developers and their contractors are reminded of the legal protection afforded to bats and bat roosts under legislation including the Conservation of Habitats and Species Regulations 2017. In the unlikely event that bats are encountered during implementation of this permission it is recommended that works stop and advice is sought from a suitably qualified, licensed and experienced ecologist at the earliest possible opportunity.

Birds

Although it may not be possible to attach a conditions, the following should be attached as an informative and advice regarding nesting birds:

- The developers are reminded of the legal protection afforded to nesting birds under the Wildlife and Countryside Act 1981 (as amended). In the event that nesting birds are encountered during implementation of this permission it is recommended that works stop until the young have fledged or then advice is sought from a suitably qualified and experienced ecologist at the earliest possible opportunity.

ENPA Archaeologist - Sadly the construction of the 20th century barn has destroyed part of the fine water management system of field gutters that were constructed at the farm by the Knight family in the mid-19th century. However, the current proposals will not increase the impact of the barn and associated activity on these features and so I have no objections to the proposals.

ENPA Landscape Officer - I have reviewed this application and consider that in landscape terms that the proposed works will result in localised small scale change to the wider landscape character and visual amenity of the surrounding holding. I do not consider this will result in additional harm given that the condition and appearance of the existing building is likely to improve.

Please note that the proposed installation of an area of concrete hardstanding to service the extended overhang to the existing roof will result in a small scale permanent change and I would request that this proposed extension of hard surfacing is fully minimised to limit that permanent change.

SCC Highways – No observations

Somerset West and Taunton Council – No comments received

Representations

6.2

No comments received

Policy Context

The proposed building work is permitted development under Part 6 to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015. In accordance with the requirements of this Order, the developer is required to give the Local Planning Authority 28 days prior notification of their intention to form the hardstanding. The principle of development is accepted by virtue of the Town and Country Planning (General Permitted Development) Order 2015. Only matters of siting, design and external appearance of the building should be considered. The Local Planning Authority can request 'prior approval' of these details if they are not convinced by the scheme and can ultimately refuse permission.

An extension of time for the determination of the prior notification application has been agreed with the applicant. The agreed period expires on 31 July 2020.

The Exmoor National Park Local Plan 2011-2031 is a material consideration.

Planning Considerations

Part 6 of Schedule 2 to the General Permitted Development Order (GPDO) grants certain permitted rights for erecting, extending or altering an agricultural building, or any excavation or engineering operations that are reasonably necessary for the purposes of agriculture within the unit. The proposal in this instance is considered to comply with the definitions, conditions and criteria in Part 6, Schedule 2 of the GPDO 2015.

Best practice is that provided all the GPDO requirements are met, the principle of whether the development should be permitted is not for consideration, and only in cases where the local planning authority considers that a specific proposal is likely to have a significant impact on its surroundings would it typically be considered necessary for an authority to require the formal submission of details for approval. It states that by no means all the development proposals notified under the Order will have such an impact.

The advice is that local authorities should always have full regard to the operational needs of the agricultural and forestry industries; to the need to avoid imposing any unnecessary or excessively costly requirements; and to the normal considerations of reasonableness. Government advice also states that local authorities will also need to consider the effect of the development on the landscape in terms of visual amenity and the desirability of preserving ancient monuments and their settings, and sites of recognised nature conservation value and, that they should weigh these two sets of considerations.

6.2

The arrangements under the prior notification procedure do not impose full planning controls over the development to which they apply – those developments remain “permitted development” under the GPDO. The principle of development will not be relevant providing the Order conditions are satisfied, nor will other planning issues.

The proposed building would replace an existing part of a building, which is very clearly in a poor state of repair. The replacement building would match the form, scale, appearance and materials of the existing building and is considered to be acceptable in this regard. The proposed extension at the eaves of the building, along the length of the south east elevation, would have little impact on the appearance of the building in the landscape and the setting of the historic farmstead. The scale of the development is considered appropriate to the context of the existing building complex.

The effect of the development upon the landscape in terms of visual amenity, as well as the desirability of preserving ancient monuments and their settings, known archaeological sites, listed buildings and their settings, and sites of recognised nature conservation value are to be considered. In this regard, the proposal is not considered to have a significant impact, particularly having regard to the nature of the development proposed and its relationship to the existing more modern building elements at the farm.

The building complex is open to views from the wider landscape, particularly from the south. The relative scale of the development, having regard to the relationship of the buildings and the nature of the local topography and vegetation, is considered to have an acceptable impact on the visual amenity and character of the area. There would be no adverse impact on ancient monuments or listed buildings or their settings.

The siting, design and external appearance of the buildings is judged to be acceptable.

A Wildlife Survey has been carried out for the development and the proposal is not considered to bring unacceptable impact on important wildlife interests at the site. The development relates to the area of existing farmyard.

Other matters

Paragraph 148 of the National Planning Policy Framework requires that “the planning system should support the transition to a low carbon future in a changing climate”, Exmoor National Park Authority has declared a climate emergency. The scope for individual planning applications to contribute to these initiatives will be dependent on the nature and scale of the development being proposed. This application is relatively minor in this regard and will have minimal impact on the reduction of carbon emissions. However, the works are necessary to safeguard the building against collapse and to support the agricultural activities at the farm holding. The proposal is considered to be an acceptable form of development.

6.2

Human Rights

The provisions of the Human Rights Act 1998 and Equalities Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

On balance, the proposed development is considered to be acceptable. The character and scenic beauty of the National Park landscape would be conserved through the development. There would be no unacceptable impact on ecology and the siting, design and external appearance of the buildings is judged to be acceptable.

It is, therefore, recommended that PRIOR APPROVAL IS NOT REQUIRED.

Recommendation

Prior Approval Not Required

Informatives

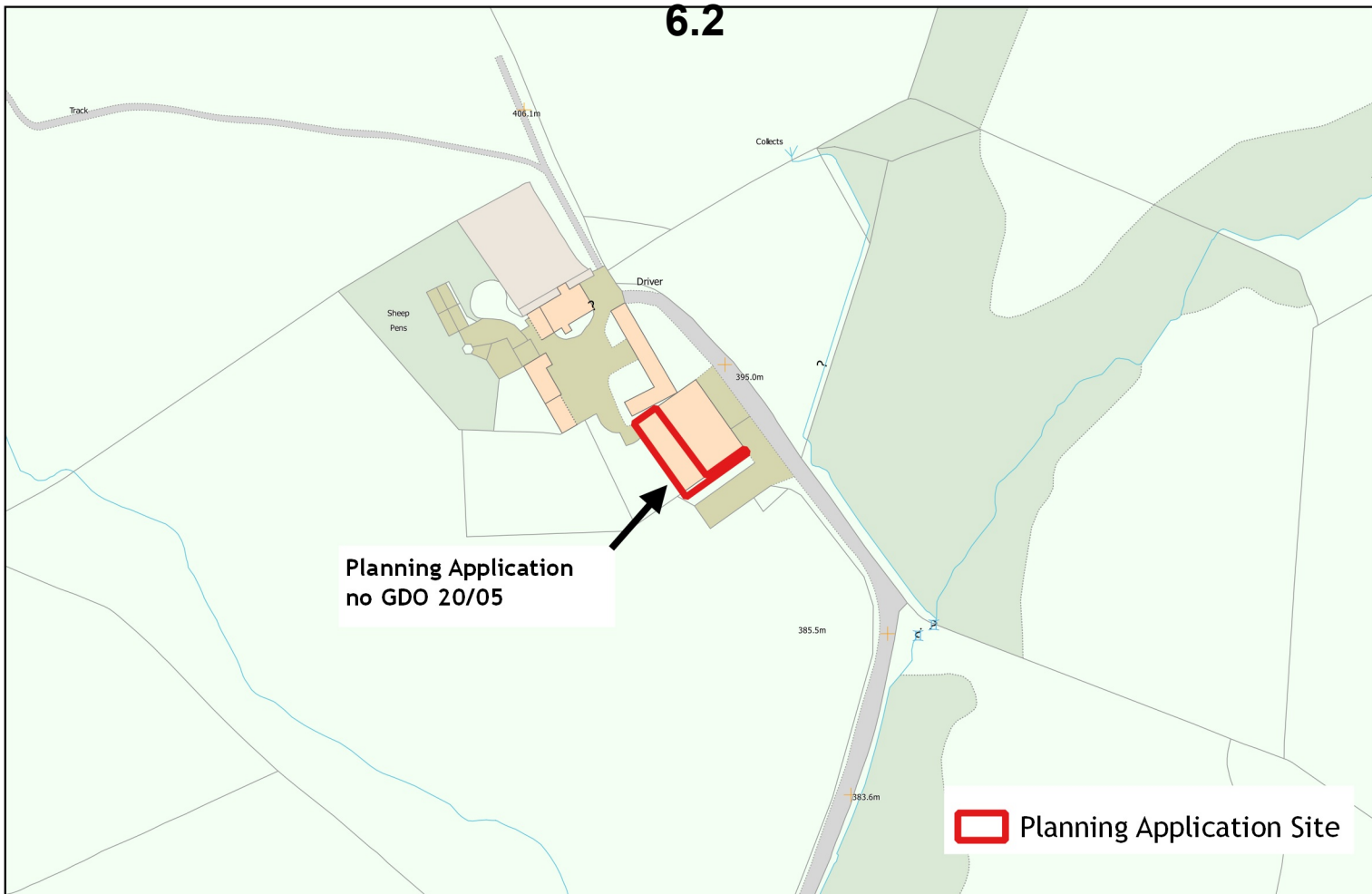
POTENTIAL IMPACT ON BATS

The developers and their contractors are reminded of the legal protection afforded to bats and bat roosts under legislation including the Conservation of Habitats and Species Regulations 2017. In the unlikely event that bats are encountered during implementation of this permission it is recommended that works stop and advice is sought from a suitably qualified, licensed and experienced ecologist at the earliest possible opportunity.

POTENTIAL IMPACT ON NESTING BIRDS

The developers are reminded of the legal protection afforded to nesting birds under the Wildlife and Countryside Act 1981 (as amended). In the event that nesting birds are encountered during implementation of this permission it is recommended that works stop until the young have fledged or then advice is sought from a suitably qualified and experienced ecologist at the earliest possible opportunity.

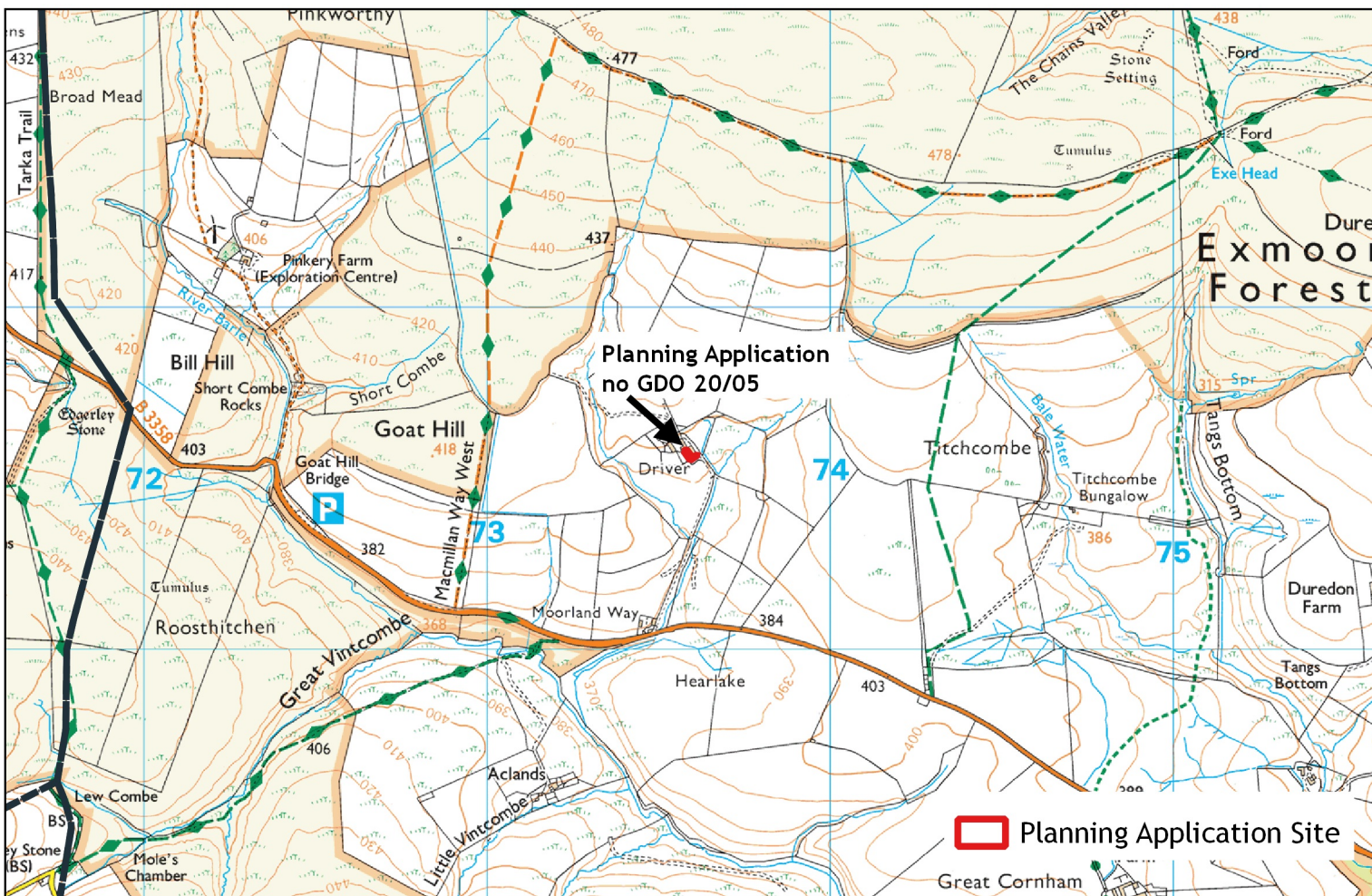
6.2



Site Map

Scale 1:2,500

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Overview Map

Scale 1:20,000

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EXMOOR NATIONAL PARK AUTHORITY

2 June 2020

INTERNAL AUDIT REVIEW

Report of the Chief Finance Officer

Purpose of Report: To present to Members a report on the internal audit work carried out during 2019/20 and the planned programme for 2020/21.

RECOMMENDATIONS: The Authority is recommended to RECEIVE the Internal Audit report for 2019/20 and NOTE the Work Programme planned for 2020/21.

Authority Priority: Achieve by providing core services; getting best value from our resources; and improving our performance.

Legal and Equality Implications: Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), Sections 1-39, Accounts and Audit (England) Regulations 2011, Part 2 (Financial Management and Internal Control).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

Financial and Risk Implications: Provision has been made in the 2019/20 and 2020/21 budgets to cover the costs of both external and internal audit. Internal Audit forms a major part of the governance and risk management arrangements of the Authority.

1. INTERNAL AUDIT

- 1.1 The Local Government Act 1972 and our Financial Regulations require the Chief Finance Officer (Section 151 Officer) to arrange for the provision of an adequate and effective system of internal audit. This service has been provided through a Service Level Agreement with Devon County Council and delivered by the Devon Audit Partnership (DAP) which is a shared service arrangement between Devon County Council, Torbay Council, Torridge and Plymouth City Council. The Partnership also provides the internal audit service to Dartmoor National Park Authority.
- 1.2 Attached at Appendix 1 is the Internal Audit Annual Report for 2019/20 and the proposed Audit Plan for 2020/21. Members will note from the appendix that in the last financial year Internal Audit appraised Key Financial Systems, Safeguarding and the Annual Governance Statement. In Section 4.2 of Appendix 1 there is a list of the five core areas concerning our key financial systems and the auditor has given a high or good level of assurance for these.
- 1.3 Section 2 of Appendix 1 contains the Internal Audit Plan for 2020/21. This plan continues at the previously agreed number of 23 audit days per annum that includes 3 days contingency provision.
- 1.4 It is anticipated that a member of the Devon Audit Partnership will be present to introduce their report.

Gordon Bryant
Chief Finance Officer
May 2020

EXMOOR NATIONAL PARK

ANNUAL INTERNAL AUDIT REPORT 2019/20 and PROPOSED INTERNAL AUDIT PLAN 2020/21

Section 1 - ANNUAL INTERNAL AUDIT REPORT 2019/20

1 INTRODUCTION

1.1 The following report sets out the background to audit service provision, review work undertaken in 2019/20, and provides an opinion on the overall adequacy and effectiveness of the Authority's internal control environment.

1.2 The Accounts and Audit Regulations 2015 specify that all Authorities are required to carry out a review at least once each year of the effectiveness of its system of internal control, and to incorporate the results of that review into their Annual Governance Statement (AGS), which must be published with the annual Statement of Accounts.

2 BACKGROUND

2.1 Service Provision

2.1.1 The Internal Audit (IA) Service for Exmoor National Park Authority is delivered by the Devon Audit Partnership. This is a shared service arrangement between Devon, Torbay, Plymouth, Torridge and Mid-Devon councils constituted under section 20 of the Local Government Act 2000.

2.2 Regulatory Role

2.2.1 There are two principal pieces of legislation that impact upon internal audit in local authorities:

- **Section 6 of the Accounts and Audit Regulations (England) Regulations 2015** which states that:

“.....A relevant authority must, each financial year—

- (a) conduct a review of the effectiveness of the system of internal control and
- (b) prepare an annual governance statement”

- **Section 151 of the Local Government Act 1972**, which requires every local authority to make arrangements for the proper administration of its financial affairs.

2.2.2 'Proper practices' have been agreed and defined by the accounting bodies including the Chartered Institute of Public Finance and Accounts and the Chartered Institute of Internal Auditors as those set out in the Public Sector Internal Audit Standards (PSIAS).

2.2.3 In addition, Internal Audit is governed by policies, procedures, rules and regulations established by the Authority. These include standing orders, schemes of delegation, financial regulations, conditions of service, anti-fraud and corruption strategies, fraud prevention procedures and codes of conduct, amongst others.

3 OBJECTIVES AND SCOPE

3.1 This report presents a summary of the audit work undertaken; includes an opinion on the adequacy and effectiveness of the Authority's internal control environment. The report outlines the level of assurance that we are able to provide, based on the internal audit work completed during the year.

3.2. The Chief Internal Auditor is required to provide the Authority with an assurance on the system of internal control of the Authority. It should be noted, however, that this assurance can never be absolute. The most that the internal audit service can do is to provide reasonable assurance, based on risk-based reviews and sample testing, that there are no major weaknesses in the system of control. In assessing the level of assurance to be given the following have been taken into account:

- the audits completed during 2019/20;
- any significant recommendations not accepted by management and the consequent risks;
- internal audit's performance;
- any limitations that may have been placed on the scope of internal audit.

4 INTERNAL AUDIT COVERAGE 2019/20

4.1 In January 2020, Devon Audit Partnership carried out the annual review of the Authority's Key Financial Systems. In addition, auditors carried out a review of the arrangements in place to generate the Authority's Annual Governance Statement (AGS), ahead of the production of the 2019/20 AGS and a review of the Authority's safeguarding processes and procedures operating across its various services.

Key Financial Systems

4.2 We are, once again, able to provide a "high" level of assurance to the Authority in relation to the internal controls that are in place to manage the Main Accounting System, budget setting / monitoring process, Payroll and Treasury Management. This means the system and controls in place adequately mitigate exposure to the risks identified. The system is being



adhered to and substantial reliance can be placed upon the procedures in place. The individual opinions issued in respect of our assignment work were as follows:-

Areas Covered		Level of Assurance
1	Income Collection	High Standard
2	Purchasing and Payments	High Standard
3	Payroll and Travel Expenditure	Good Standard
4	Main Accounting System	High Standard
5	Budgetary Control	High Standard
6	Bank reconciliations	Good Standard

4.3 As noted in previous annual reports the financial management arrangements within the Authority are well established and many members of staff have long experience giving them a good understanding and knowledge of the financial controls and requirements of regulations and policies. We have developed good relations with the Head of Finance & Operations and are available to be consulted on matters relating to control mechanisms.

4.4 Following discussions and limited testing over a two-week period, our opinion is that the Exmoor National Park Authority continue to operate financial systems and controls to a high standard.

4.6 Some recommendations, chiefly around updating and reviewing key documents have been included and these are intended to assist management with maintaining these high standards going forward.

4.7 Our testing highlighted that the Authority meeting minutes are not published on the website as a separate document although they do appear as an item on the agenda of the next meeting and are available as an audio recording. In the interests of transparency, the Authority should consider publishing the minutes of meetings on the website.

4.8 Somerset County Council continue to provide payroll services to the Park Authority, using the County Council's SAP financial systems. It was noted that there is no current service level agreement in place between the two organisations for the provision of access to SAP. This may lead to difficulties in the event of a dispute such as may arise due to poor standards of service. Whilst this has been suggested to colleagues at the County Council, Park Authority management are happy with the current arrangements.

4.9 Several instances were noted where receipts in respect of parking had not been attached to members claims forms. This may affect the Authority's ability to recover VAT.

4.10 It is recommended that the Park Authority's Financial Regulations be reviewed to ensure they remain up to date. The current Regulations were adopted in 2015 and whilst there is much within the document that remains valid, some information is now out of date due to organisational restructuring.

Safeguarding

4.11 Exmoor National Park Authority has a legal duty of care to provide a safe environment when children and adults at risk access its services. The Authority needs to ensure that its policies and practices reflect this duty.

4.12 As part of the agreed 2018/19 Audit Plan, time was allocated to evaluate the adequacy of the safeguarding processes and procedures operating across services.

4.13 The areas examined during the course of this review were:

- Authority's policies and procedures;
- Governance and Legislation;
- Communication, Awareness and Training;
- Sharing and Recording of Information;
- Reporting and Complaints;
- Safer Recruitment.

4.14 The review of the safeguarding framework identified that ENPA have a number of good safeguarding measures in place, including:

- "Young and Vulnerable People's Protection Policy" in place, which sets out the Authority's approach to safeguarding and promoting the welfare of children, young people and vulnerable people;
- safer recruitment checks for staff and volunteers who work directly with vulnerable groups and run activities;
- all activities run by ENPA are risk assessed, hazards / risks identified, and mitigation put in place as necessary.

4.15 As part of the agreed 2018/19 Audit Plan, time was allocated to evaluate the adequacy of the safeguarding processes and procedures operating across services.

However, an "Improvements Required" level of assurance has been provided overall in respect of the safeguarding framework, due to the absence of, or breakdown in, key controls, which will compromise ENPA ability to be able to fulfil its statutory "duty of care" responsibilities, thereby increasing the safeguarding risk for children and vulnerable adults. Absent controls include:

- The Park Authority not appointing designated safeguarding lead;
- No formalised safeguarding training in place for staff, volunteers or members of the Park Authority;

4.16 It is recognised, however, that the overall safeguarding risk is low since all services provided involving children or vulnerable adults would be supervised by the visiting group leader, who would have overall responsibility for the safeguarding of the individuals group members. The assurance level therefore needs to be considered in context. The recommendations made below will assist management in strengthening the safeguarding framework moving forward.

4.17 In their response to our findings and recommendations, management have informed auditors that steps have been taken to identify training needs for the now designated Safeguarding Officer and their deputy, with their role responsibilities detailed in the Safeguarding Policy. Other policies, such as social media, are under review to ensure that they cover safeguarding where necessary. In addition, steps are being taken to arrange training for staff and members, the updating of the Employee Handbook, induction programme and Health & Safety briefings together with the provision of guidance for contractors and external activity leaders. Training/briefings will be subject to the lifting of COVID-19 restrictions in many cases.

Annual Governance Statement (AGS)

4.18 A review of the processes in place to generate the 2018/19 Annual Governance Statement was undertaken in November 2019.

4.19 The audit was carried out against the new "Delivering Good Governance in Local Government" that has been produced by Chartered Institute of Public Finance and Accounting (CIPFA) and Society of Local Authority Chief Executives and Senior Managers (SOLACE), based around the seven core principles of good governance.

4.20 We are pleased to confirm that the arrangements in place to generate the Annual Governance Statement (AGS) remain sound and effective and the Authority is able to demonstrate effective governance controls. In relation to governance arrangements, we have made one observation relating to the Standards Committee, and suggested that management produce an annual report for the Committee on performance against the Code of Conduct. Whilst It is understood that, as there have been no issues relating to non-compliance of the Code of Conduct, nothing has been formally reported to the Standards Committee. Monitoring compliance with and training of members and officers in the Code of Conduct is one of the key roles of the Standards Committee and, without such a report, it would be difficult to see how they are able to satisfy themselves and discharge their duty in this respect.

5 INTERNAL AUDIT OPINION

5.1 In carrying out systems and other reviews, Internal Audit assesses whether key, and other, controls are operating satisfactorily within the area under review, and an opinion on the adequacy of controls is provided to management as part of the audit report.

5.2 Our final audit reports also include an action plan which identifies responsible officers, and target dates, to address control issues identified during a review. Implementation of action plans are reviewed during subsequent audits or as part of a specific follow-up process.

5.3 Management has been provided with details of our work completed in 2019/20 to assist them when considering governance arrangements. The expectation is that if significant weaknesses are identified in specific areas, these should be considered by the Authority in preparing its Annual Governance Statement; there are no such "significant weaknesses" arising from our work in 2019/20.

5.4 Overall, and based on work performed during 2018/19, Internal Audit is able to provide Full Assurance on the adequacy and effectiveness of the Authority's internal control environment.

Full Assurance	Risk management arrangements are properly established, effective and fully embedded, aligned to the risk appetite of the organisation. The systems and control framework mitigate exposure to risks identified & are being consistently applied in the areas reviewed.
Significant Assurance	Risk management and the system of internal control are generally sound and designed to meet the organisation's objectives. However, some weaknesses in design and / or inconsistent application of controls do not mitigate all risks identified, putting the achievement of particular objectives at risk.
Limited Assurance	Inadequate risk management arrangements and weaknesses in design, and / or inconsistent application of controls put the achievement of the organisation's objectives at risk in a number of areas reviewed.
No Assurance	Risks are not mitigated and weaknesses in control, and /or consistent non-compliance with controls could result / has resulted in failure to achieve the organisation's objectives in the areas reviewed, to the extent that the resources of the Council may be at risk, and the ability to deliver the services may be adversely affected.

Section 2 - INTERNAL AUDIT PLAN 2020/21

1 INTRODUCTION

1.1 Under the Local Government Act 1972, the Chief Financial Officer has a statutory duty to ensure that all financial systems in the Authority are secure. Assurance that this is the case is given through the reporting of Internal Audit. Audits will be carried out under the terms of Accountancy and Audit Regulations 2015.

1.2 As the Internal Auditors for Exmoor National Park Authority it is our responsibility to ensure that all financial systems are operating effectively and in line with the Authority's financial regulations.

2 THE AIM OF THE PLAN

2.1 The plan is reviewed and agreed on an annual basis, incorporating the key risks identified through the Authority's risk register and areas identified by Internal Audit. The plan also incorporates the requirements of the External Auditors in reviewing finance systems.

2.2 The main objectives of the plan are to provide assurance to the Section 151 Officer and the external auditors that all financial systems are: -

- Secure;
- Effective;
- Efficient;
- Accurate;
- Complete;
- Compliant.

2.3 In order to confirm this, system reviews and compliance testing are completed at the Authority's HQ (Dulverton, Somerset) and other sites located throughout the Park, as required.

3 THE PLAN

3.1 The audit plan for the financial year 2020/21 allows for up to 23 days of internal audit support.

3.2 This covers the financial audit reviews required as part of Internal Audit responsibilities in reporting to the Section 151 Officer, but also satisfies your external auditors of the security and effectiveness of the financial systems. As your Internal Auditors we will provide the documentation required by external audit to ensure they are satisfied with operations.

3.3 We liaise with your external auditors to discuss the testing planned to ensure this satisfies their requirements and reduces their need for review of these financial systems. The remainder of the planned days incorporates reviews of specific systems as identified through an audit risk assessment process, the Authority's risk register and liaison with management.

3.4 The plan includes a review of the following key financial systems:-

- Payroll
- Creditors (payments)
- Debtors (income collection)
- Main Accounting system
- Budgetary control
- Bank Reconciliation

Note – these reviews may change to take account of the needs of External Audit.

3.5 Any major findings (if applicable) from the previous year’s audit plan will be reviewed to ensure that agreed recommendations have been implemented and are effective. An annual report for your Park Authority Committee will be produced in good time and for the expected June 2021 meeting.

3.6 As part of the audit plan we will also provide assistance and advice and be a central contact point for the Head of Finance and Operations. We would be happy to consider undertaking special project work as and when appropriate and required.

4 TIMETABLE

4.1 The audits will be completed at specified times of the year through consultation and prior agreement of the Head of Finance and Operations. This will also take into account the timetable of external audit where applicable.

4.2 All findings will be reviewed with the Head of Finance and Operations at the end of each audit programme and prior to the issue of any draft reports.

4.3 A copy of all final reports will be available to your External Auditors for their information.

5 2020/21 PLAN

5.1 The following table sets out the planned internal audit work for 2019/20. Other issues and systems are sometimes identified during the course of the audits and if found will be discussed with the Head of Finance and Operations. These issues may be incorporated into future audit plans dependent upon priority and risk assessment.

Audit	Days
Material systems	
Financial Systems	12
Risk Based	
Safeguarding – Follow-up to 2019/20 Review	2
Climate Change	4
Other work	
Audit Plan / Annual Report etc	2
Contingency - To cover additional work if required	3
Total days	23

5.2 The cost of these 23 days will be £6,670 (plus VAT) (please note we shall only charge for contingency days if these are required). Additional support will be provided as and when required. Our standard daily rate for this work will be £290, although specialist support may be at a different rate. Please contact us for further details. (Please note that this is an increase of £5 on last year's rates due to Pay related increases).

Robert Hutchins
Head of Devon Audit Partnership
May 2020

EXMOOR NATIONAL PARK AUTHORITY

2 June 2020

MEMBERS' ALLOWANCES SCHEME

Report of the Chief Finance Officer

Purpose of Report: To publish the amounts paid to Members during 2019/20 by way of the Members' Allowances Scheme adopted by the Authority for that year.

RECOMMENDATION: The Authority is recommended to NOTE the amounts paid to Members in 2019/20 through its Scheme for Members' Allowances.

Authority Priority: Achieve by providing core services; getting best value from our resources; and improving our performance.

Legal and Equality Implications: Publication of the amounts paid to Members through the Members' Allowance Scheme is required under The Local Authorities (Members' Allowances) (England) Regulations 2003.

The equality and human rights impact of the recommendation of this report has been assessed as having no adverse impact on any particular group or individual.

Financial and Risk Implications: No financial or risk implications have been identified in publishing the amounts paid to Members of the Authority by way of the approved scheme of allowances.

1. INTRODUCTION

- 1.1 Members agreed the Scheme of Members' Allowances to be operated in 2019/20 at the Authority's meeting held on 5 February 2019. The scheme adopted provided for:-
- Future in-year adjustments to Basic Allowances and Special Responsibility Allowances to be linked to staff pay cost of living awards.

2. SCHEME OF ALLOWANCES 2019/20

- 2.1 The total allowances paid to Members for meetings attended during the year are set out in Appendix 1. The allowances and reimbursements paid in 2019/20 totals £71,338 (2018/19 = £84,274).
- 2.2 The amount paid in 2019/20 represents a decrease from the previous year of £12,936, or 15%.
- 2.3 The financial data in the Appendix is supplemented by columns which show for each Member the actual mileage claimed, the number of main meetings of the Authority, Standards and Final Accounts Committees attended by Members in the year, and the number of other meetings and training/awareness events attended.

Gordon Bryant
Head of Finance and Operations
May 2020

SUMMARY OF ALLOWANCES PAID TO MEMBERS 2019/20

Member (Home town)	Basic Allowance £	Special Responsibility Allowance £	Sub-sistence £	Re-imbursment for Fares, Tickets etc £	Mileage Allowance £	Total Allowances paid £	Miles claimed in connection with Authority business	Main business meetings attended Actual/Possible	Other meetings and training events attended
Mrs L Blanchard Tansley (Parracombe)	2,739			67	382	3,188	900	10/11	31
Miss A Davis (Kentisbury)	2,739	4,109		111	934	7,894	1,739	9/12	66
Mr M Dewdney (appointed to 10.06.19) (Watchet)	685	1,027			181	1,893	310	3/3	13
Mr R Edgell (South Molton)	2,739			56	282	3,077	605	11/12	38
Mr M Ellicott (Exford)	2,739	1,024		65	182	4,009	386	12/13	40
Mr B Heywood (appointed to 10.06.19) (Dulverton)	685					685		3/3	8
Mr N Holliday (Stroud)	2,739		81	223	1,877	4,920	4,217	12/12	41
Mr J Holtom (appointed from 26.06.19) (Parracombe)	2,093							7/8	17
Mr J Hunt (Wellington)	2,739			32	151	2,922	336	9/11	19
Mr I Jones (appointed to 10.06.19) (Porlock)	685			2	15	702	118	1/3	1
Mr M Kravis (appointed from 10.06.19) (Blue Anchor)	2,214				44		97	7/8	18
Mrs C Lawrence (Minehead)	2,739			18	151	2,908	346	10/11	19
Mr E Ley (Bishops Nympton)	2,739				142	2,881	316	8/11	23
Mr R Milton (West Anstey)	2,739	5,479		52	400	8,670	1,248	12/12	71
Mrs F Nicholson (East Anstey)	2,739			47	174	2,960	387	12/12	43
Mr J Patrinis (Parracombe)	2,739	512		52	436	3,738	760	11/13	34
Mr B Peacock (appointed to 26.06.19) (Lynton)	685			16	111	811	246	3/3	10
Sir R Peek (appointed to 26.06.19) (North Molton)	685				27	712		3/3	6
Mr P Pilkington (appointed from 10.06.19) (Wheddon Cross)	2,214							7/8	21
Mr S Pugsley (Withypool)	2,739	3,417		5	274	6,435	589	12/13	58

Mr W Revans (North Petherton)	2,739				2,739		8/11	17
Mr M Ryall (Kentisbury)	2,739	54	462		3,255	1,028	11/11	38
Mrs E Stacey (Chudleigh)	2,739	60	574		3,373	1,260	9/13	25
Mrs S Takle (appointed from 26.06.19) (Timberscombe)	2,093						4/9	16
Mr N Thwaites (appointed from 10.06.19) (Dulverton)	2,214						8/9	22
Mrs P Webber (appointed to 26.06.19) (Minehead)	685	14	49		747	70	3/3	8
Mr V White (Wheddon Cross)	2,739	78			2,817		12/12	44
TOTALS	58,767	15,567	81	948	6,846	71,338	14,958	

NB:

- Mileage allowances paid vary because of the distances members have to travel to attend meetings
- Those members in particular who receive a special responsibility allowance attended a range of other meetings and events outside the recognised Authority meetings
- Some details of "Other meetings and training events attended" are noted from claims submitted by members. If members have chosen not to claim, it may mean that some meetings attended by that member are not included.

EXMOOR NATIONAL PARK AUTHORITY

2 JUNE 2020

ANNUAL TREASURY MANAGEMENT REPORT

Report of the Head of Finance & Operations

Purpose of Report: To report to Members on Treasury Management Performance in 2019-20.

Recommendation: The Authority is recommended to NOTE the Treasury Management Outturn for 2019-20.

Authority Priority: Achieve by providing core services; getting best value from our resources; and improving our performance.

Legal and Equality Implications: Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to “do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to-

(a) The accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]

(b) The carrying out of any functions conferred on it by virtue of any other enactment.”

The Local Government Act 2003 (LGA 2003)

The CIPFA Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes: Revised 2017 Edition (CIPFA TM Code).

The CIPFA Prudential Code for Capital Finance in Local Authorities: Revised 2017 Edition (CIPFA Prudential Code).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

1. Introduction

1.1 The Authority’s Treasury Management activities are defined as follows: -

“The management of the Authority’s investments and cash flows, its banking and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

It is acknowledged that effective treasury management provides support to the business and service objectives of the Authority.

1.2 Many Local Authorities continue to invest in non-financial assets, with the primary aim of generating profit. Others have entered into very long-term investments or providing loans to local enterprises or third sector entities as part of regeneration or economic growth projects. The National Audit Office and the Public Accounts Committee raised a number of concerns about Local Authority (investment) behaviour, and as a result Statutory Guidance on Local Government Investments has been revised as from 1st April 2018. The CIPFA Treasury Management and Prudential Codes have also been reviewed and updated.

- 1.3 The CIPFA Treasury Management Code requires public sector authorities to determine an annual Treasury Management Strategy and as a minimum, formally report on their treasury activities and arrangements mid-year and after the year-end. These reports enable those tasked with implementing policies and undertaking transactions to demonstrate they have properly fulfilled their responsibilities and enable those with ultimate responsibility/governance of the treasury management function to scrutinise and assess its effectiveness and compliance with policies and objectives.
- 1.4 During 2019-20, Somerset County Council (SCC) has continued to manage Treasury Management activities under an agreed Service Level Agreement. Investments were made on the basis of aggregating funds in order to maximise the benefits for both bodies (including using SCC's "Comfund"). Accounting arrangements were in place to divide the interest gained (and charged) between the Authorities.
- 1.5 As a result of the second Markets in Financial Instruments Directive (MiFID II), from 3rd January 2018 local authorities were automatically treated as retail clients but could "opt up" to professional client status, providing certain criteria was met. SCC continues to meet the conditions to opt up to professional status and has done so in order to maintain its erstwhile MiFID II status prior to January 2018. As a result, SCC will continue to have access to products including money market funds, pooled funds, treasury bills, bonds, shares and to financial advice.
- 1.6 The Authority delegates responsibility for the implementation and monitoring of its treasury management policies and practices, and the execution of administration of treasury management decisions, to me as Head of Finance & Operations.

2. The Economic Background to 2019-20

- 2.1 All Treasury Management decisions are made in a dynamic environment in which market sentiment, and rates for borrowing and investment are subject to constant change from many different factors. Any volatility in markets makes risk management, forecasting and decision making more difficult. Here follows a brief review of the key issues for 2019-20.
- 2.2 The UK's exit from the European Union and future trading arrangements had remained one of the major influences on the UK economy and sentiment during 2019-20. The 29th March 2019 Brexit deadline was extended to 12th April, then to 31st October and finally to 31st January 2020. Politics played a major role in financial markets over the period as the UK's tenuous progress negotiating its exit from the European Union together with its future trading arrangements drove volatility, particularly in foreign exchange markets. The outcome of December's General Election removed a lot of the uncertainty and looked set to provide a 'bounce' to confidence and activity.
- 2.3 GDP growth in Q4 2019 was reported as flat by the Office for National Statistics. Service sector growth slowed and production and construction activity contracted on the back of what at the time were concerns over the impact of global trade tensions on economic activity. The annual rate of GDP growth remained below-trend at 1.1%.
- 2.4 The headline rate of UK Consumer Price Inflation fell to 1.7% year-on-year in February, below the Bank of England's target of 2%. Labour market data remained positive. The ILO unemployment rate was 3.9% in the three months to

January 2020 while the employment rate hit a record high of 76.5%. The average annual growth rate for pay excluding bonuses was 3.1% in January 2020 and the same when bonuses were included, providing some evidence that a shortage of labour had been supporting wages.

- 2.5 Then coronavirus swiftly changed everything. COVID-19, which had first appeared in China in December 2019, started spreading across the globe causing plummeting sentiment and falls in financial markets not seen since the Global Financial Crisis of 2008, as part of a flight to quality into sovereign debt and other perceived 'safe' assets.
- 2.6 In response to the spread of the virus and sharp increase in those infected, the government enforced lockdowns, central banks and governments around the world cut interest rates and introduced massive stimulus packages in an attempt to reduce some of the negative economic impact to domestic and global growth.
- 2.7 The Bank of England, which had held policy rates steady at 0.75% through most of 2019-20, moved on March 11th to cut rates to 0.25% from 0.75% and then on March 19th brought them down further to the record low of 0.1%. In conjunction with these cuts, the UK government introduced a number of measures to help businesses and households impacted by a series of ever-tightening social restrictions, culminating in pretty much the entire lockdown of the UK.
- 2.8 Financial markets sold off sharply as the impact from the coronavirus worsened. After starting positively in 2020, the FTSE 100 fell over 30% at its worst point with stock markets in other countries seeing similar huge falls. In March sterling touched its lowest level against the dollar since 1985. The measures implemented by central banks and governments helped restore some confidence and financial markets have rebounded in recent weeks but remain extremely volatile. The flight to quality caused gilts yields to fall substantially. The 5-year benchmark falling from 0.75% in April 2019 to 0.26% on 31st March. The 10-year benchmark yield fell from 1% to 0.4%, the 20-year benchmark yield from 1.47% to 0.76% over the same period.
- 2.9 With Base Rate remaining at 0.75% for the majority of the year money markets rates for periods up to 3-months averaged similar to those for the previous year. However, due to the negative sentiment caused by Brexit, average rates for periods over 6-months reduced. For a few days in March overnight LIBID actually turned negative. 1-month, 3-month, 6-month, and 12-month LIBID (London Interbank Bid) rates averaged 0.56%, 0.63%, 0.70%, and 0.80% respectively over the period. A summary of PWLB and key benchmark lending rates is included at Appendix A.

3. Treasury Management Outturn for 2019-20

3.1 Debt Management

- 3.1.1 The Authority is currently debt free. Any potential borrowing is driven by the capital plan. There were no plans that necessitated borrowing during 2019-20.

3.2 Investment Activity

- 3.2.1 The Guidance on Local Government Investments in England gives priority to security and liquidity and the Authority's aim is to achieve a yield commensurate with these principles.

- 3.2.2 As mentioned in 1.4, SCC has managed Treasury Management activities under an agreed Service Level Agreement. Investments were made on the basis of aggregating funds in order to maximise the benefits for both bodies (including using SCC's "Comfund"). The current arrangement strategy of lending all surplus funds to SCC represents an investment that is virtually free from risk of counterparty default, as SCC is the only counterparty. Also, with MiFID II, SCC will continue to have access to products that would be beyond ENP.
- 3.2.3 Security of capital remained SCC's main investment objective. Current SCC approved counterparties are listed below. Those used during the year are denoted with a star.

Bank or Building Society		Bank or Building Society	
Australia & NZ Bank	*	Standard Chartered Bank	*
Bank of Scotland		Handelsbanken Plc	*
Bank of Montreal		Toronto-Dominion Bank	*
Bank of Nova Scotia		United Overseas Bank	*
Barclays Bank Plc			
Canadian Imperial Bank of Commerce			
Close Brothers Ltd	*	Sterling CNAV Money Market Funds	
Commonwealth Bank of Australia		Goldman Sachs MMF	
DBS Bank Ltd	*	Deutsche MMF	
DZ Bank	*	Invesco Aim MMF	*
Goldman Sachs International Bank	*	Federated Prime MMF	*
HSBC Bank	*	JP Morgan MMF	
Landesbank Hessen-Thuringen		Insight MMF	*
Lloyds Bank	*	Aberdeen Standard MMF	*
National Australia Bank		LGIM MMF	*
National Westminster	*	SSGA MMF	*
Nationwide BS			
Nordea Bank			
OP Corporate Bank			
Oversea-Chinese Banking Corporation		Other Counterparties	
Rabobank	*	Other Local Authorities	* (16)
Royal Bank of Scotland		Debt Management Office	
Santander UK	*	CCLA Property Fund	*

- 3.2.4 SCC has continuously monitored counterparties, and all ratings of proposed counterparties have been subject to verification on the day, immediately prior to investment. Other indicators taken into account have been:-
- Credit Default Swaps and Government Bond Spreads.
 - GDP and Net Debt as a Percentage of GDP for sovereign countries.
 - Likelihood and strength of Parental Support.
 - Banking resolution mechanisms for the restructure of failing financial institutions i.e. bail-in.
 - Share Price.
 - Market information on corporate developments and market sentiment towards the counterparties and sovereigns.
- 3.2.5 In Quarter 4 2019 Fitch affirmed the UK's AA sovereign rating, removed it from Rating Watch Negative (RWN) and assigned a negative outlook. Fitch then affirmed UK banks' long-term ratings, removed the RWN and assigned a stable outlook. Standard & Poor's also affirmed the UK sovereign AA rating and revised the outlook to stable from negative.
- 3.2.6 The Bank of England announced its latest stress tests results for the main seven UK banking groups. All seven passed on both a common equity Tier 1 (CET1) ratio and a leverage ratio basis. Under the test scenario the banks' aggregate level of CET1 capital would remain twice their level before the 2008 financial crisis.
- 3.2.7 Fitch downgraded the UK sovereign rating to AA- in March 2020 which was followed by a number of actions on UK and Non-UK banks. This included revising the outlook on all banks on the counterparty list to negative, with the exception of Barclays Bank, Rabobank, Handelsbanken and Nordea Bank which were placed on Rating Watch Negative. Close Brothers long-term rating was cut to A-. HSBC Bank and HSBC UK Bank, however, had their long-term ratings increased by Fitch to AA-
- 3.2.8 After remaining flat in January and February and between a range of 30-55bps, Credit Default Swap spreads rose sharply in March as the potential impact of the coronavirus on bank balance sheets gave cause for concern. Spreads declined in late March and through to mid-April but remain above their initial 2020 levels.
- 3.2.9 While the UK and Non-UK banks on the SCC counterparty list remain in a strong and well-capitalised position, the duration advice on all these banks was cut to 35 days for new deposits in mid-March by SCC advisors Arlingclose.
- 3.2.10 In order to increase diversification of the portfolio, more deposits were placed with UK Local Authorities. Sixteen deposits were placed with Local Authorities during the year. This allowed for longer-dated maturities with excellent creditworthiness and an appropriate yield.
- 3.2.11 It should be emphasised that the current Authority strategy of lending all surplus funds to SCC represents an investment that is virtually free from risk of counterparty default, as SCC is the only counterparty.
- 3.2.12 The Treasury portfolio at the end of this and the previous financial year is set out below:-

	Balance on 31/03/2019 £000	Rate %	Balance on 31/03/2020 £000	Rate %	Average Balance £000	Average Rate %
Revenue Balances	7	0.375	-41	0.00	265	0.37
Comfund Balances	2,800	1.01	2,800	0.92	2,961	0.99
Total Balances	2,807	1.01	2,759	0.92	3,226	0.94

There was a decrease of £48,000 in overall cash balances held by the Authority at 31st March 2020 as compared with 31st March 2019.

- 3.2.13 The average daily balance of the Authority's revenue cash was around £265k, an increase of £9k, earning net interest at Base Rate minus 0.375% for most of the year until base rate reductions in March. Currently no interest is paid on revenue balances. Net interest earned on revenue was £974 compared to £735 for the year in 2018-19.
- 3.2.14 At year-end, revenue cash held by SCC was £-41k. Minimising revenue cash enables a larger balance to remain invested in Comfund. The Comfund rate (net of fees of 2% of interest) earned more than the net revenue return of 0.37% by 0.62%.
- 3.2.15 Comfund investment averaged £2.961m over the year (£2.975m in 2018-19). Investment peaked at £3.2m in January and ended the year at £2.8m. Interest earned was 0.99% gross, 0.97% net, producing £28,873 income net of fees (£25,197 in 2018-19). Fees amounted to £589 (2% of interest received). The net benefit of investing in the Comfund equates to a monetary benefit of £18,662.
- 3.2.16 The ENPA combined average gross return of 0.94% was 0.22% higher than the average Base Rate for the year. This out-performed the benchmark used by SCC and was 29 basis points in excess of that for the average 6-month LIBID rate, and 19 basis points above the average 12-month LIBID rate (see Table 1 in Appendix A).

4. **Compliance**

- 4.1 During the year, all ENPA treasury management policies, practices, and activities remained compliant with all relevant statutes and guidance, namely the MHCLG investment guidance issued under the Local Government Act 2003, the CIPFA Code of Practice for Treasury Management, and the CIPFA Prudential Code.
- 4.2 The MHCLG's current Guidance on Investments, revised 1st April 2018, reiterated security and liquidity as the primary objectives of a prudent investment policy. All lending was compliant with guidance issued by the MHCLG, and as SCC was the only counterparty for all funds for the year, this was achieved at minimal risk.
- 4.3 For completeness, and to comply with guidance, Prudential limits set, and actual outcomes are to be reported. All treasury activity was conducted within the benchmarks set as Prudential limits for prudent and sustainable capital plans, financing, and investment. Indicators approved for the year are set out in the left-hand columns, with actual outturns on the right:-

1 Borrowing Limits

Authorised £100,000

Operational £100,000

Actual
Nil
Nil

2 Maturity Structure

	Upper Limit	Lower Limit	Value	Actual
	%	%		%
< 12m	100	0	0.00	0.0
> 12m < 24m	0	0	0.00	0.0
> 24m < 5yrs	0	0	0.00	0.0
> 5yrs < 10yrs	0	0	0.00	0.0
> 10yrs	0	0	0.00	0.0
			<hr/>	
			0.00	0.0

3 Investments > 365 days

0 0

Gordon Bryant
Head of Finance & Operations
May 2020

Table 1. Money Market Rates 2019-20 (LIBID Source = ICE LIBOR previously BBA LIBOR)

	O/N LIBID	7-Day LIBID	1-Month LIBID	3-Month LIBID	6-Month LIBID	12-Month LIBID	2-Yr SWAP
01/04/2019	0.55	0.57	0.60	0.72	0.83	0.93	0.97
30/04/2019	0.56	0.57	0.61	0.69	0.82	0.97	1.04
31/05/2019	0.56	0.58	0.60	0.67	0.75	0.87	0.87
30/06/2019	0.55	0.56	0.60	0.65	0.73	0.83	0.83
31/07/2019	0.54	0.56	0.59	0.65	0.69	0.73	0.66
31/08/2019	0.56	0.56	0.58	0.63	0.66	0.71	0.65
30/09/2019	0.54	0.57	0.59	0.63	0.70	0.76	0.65
31/10/2019	0.55	0.57	0.59	0.68	0.75	0.85	0.76
30/11/2019	0.55	0.56	0.58	0.67	0.73	0.82	0.78
31/12/2019	0.55	0.57	0.58	0.67	0.76	0.86	0.79
31/01/2020	0.55	0.56	0.58	0.64	0.69	0.75	0.66
29/02/2020	0.56	0.56	0.55	0.55	0.56	0.63	0.56
31/03/2020	-0.07	0.01	0.12	0.47	0.60	0.74	0.49
Average 2019-20	0.52	0.53	0.56	0.63	0.70	0.80	0.83
Minimum	-0.07	0.00	0.11	0.26	0.31	0.39	0.60
Maximum	0.56	0.58	0.61	0.72	0.83	0.98	1.06
Spread	0.63	0.58	0.50	0.46	0.52	0.59	0.46
Average 2018-19	0.49	0.51	0.53	0.67	0.79	0.94	1.09
Difference in average	+0.03	+0.02	+0.03	-0.04	-0.09	-0.14	-0.26

Table 2. PWLB Rates 2018-19 (Maturity rates unless stated)

	1 Year	5 Year	5 Year EIP	10 Year	15 Year EIP	30 Year	50 Year
01/04/2019	1.66	1.72	1.65	2.04	1.88	2.58	2.44
30/04/2019	1.75	1.88	1.78	2.22	2.06	2.71	2.58
31/05/2019	1.62	1.61	1.57	1.90	1.74	2.48	2.36
30/06/2019	1.63	1.61	1.59	1.88	1.73	2.49	2.36
31/07/2019	1.46	1.40	1.40	1.70	1.53	2.41	2.32
31/08/2019	1.44	1.29	1.35	1.41	1.31	2.01	1.88
30/09/2019	1.48	1.27	1.34	1.47	1.33	2.01	1.87
31/10/2019	2.61	2.41	2.48	2.61	2.48	3.18	3.05
30/11/2019	2.61	2.46	2.51	2.65	2.52	3.21	3.08
31/12/2019	2.62	2.63	2.60	2.87	2.74	3.39	3.25
31/01/2020	2.56	2.40	2.45	2.53	2.43	3.04	2.91
29/02/2020	2.42	2.28	2.33	2.45	2.32	2.94	2.79
31/03/2020	2.1	2.15	2.12	2.34	2.22	2.80	2.58
Average 2019-20	2.03	1.97	1.97	2.20	2.07	2.74	2.60
Minimum	1.37	1.20	1.27	1.33	1.23	1.92	1.77
Maximum	2.67	2.65	2.62	2.96	2.82	3.41	3.25
Spread	1.30	1.45	1.35	1.63	1.59	1.49	1.48
Average 2018-19	1.70	2.00	1.81	2.39	2.22	2.82	2.66
Difference in average	+0.33	-0.03	+0.16	-0.19	-0.15	-0.08	-0.06