

Date of Meeting 15th December 2020

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Proposed consultation on a local plan issues and options report

Report summary:

This report seeks approval for consultation to start in January 2021 on a new local plan issues and options report. The proposed document for consultation is appended to this report. As drafted the issues and options report does not seek to set out defined solutions for a new local plan, rather it raises some of the key issues and seeks feedback on options presented. The intent is that consultation will start on Monday for 18 January 2021 and run for eight weeks, concluding at mid-day on Monday 15 March 2021. The feedback received from the consultation will be used to inform emerging and developing thinking on the form, structure and content of a new local plan. This report provides further detail on the proposed work streams for the next two years which will see the plan submitted for Examination in early spring 2023 and also some background material and considerations relevant to plan production overall.

Recommendation:

That Members agree:

- 1. That consultation on the draft local plan issues and options report, as appended to this paper, starts in January 2021 and runs for an eight week period.**
- 2. That delegated authority is granted to the Service Lead – Planning Strategy and Development Management in consultation with the Portfolio Holder for Strategic Planning, to make any minor changes to finalise the consultation document and facilitate the requirements of consultation software as well as to make any changes agreed at committee.**

Reason for recommendation:

To ensure that authority is given to start consultation on an issues and options report to support production of a new local plan and to finalise the document and ensure on-line questions are suited to software requirements.

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Portfolio(s) (check which apply):

- Climate Action
- Corporate Services and COVID-19 Response and Recovery
- Democracy and Transparency
- Economy and Assets
- Coast, Country and Environment
- Finance

- Strategic Planning
- Sustainable Homes and Communities

Financial implications: The financial implications have been discussed within the body of the report and the Local plan funding requirement has been addressed within the budget setting process. An increase to the budget requirement for Consultancy expenditure in 21/22 has been proposed within Planning Policy, in addition to the two staff members that have previously been considered.

Legal implications: There are no legal implications other than as set out in this consultation report.

Equalities impact Low Impact

Climate change High Impact

Risk: High risk; the issues and options consultation is an important stage in local plan production and sets a tone for future work. Should the consultation not go well it could send out negative messages for future plan making work.

Links to background information [Appendix 1 East Devon Local Plan 2021 – 2040 Issues and Options Consultation January 2021](#)

Link to [Council Plan](#):

Priorities (check which apply)

- Outstanding Place and Environment
- Outstanding Homes and Communities
- Outstanding Economic Growth, Productivity, and Prosperity
- Outstanding Council and Council Services

1 Legal context and introduction

- 1.1 The legal context for producing a new local plan is set out in the Planning and Compulsory Purchase Act 2004 (as amended) and also in The Town and Country Planning (Local Planning) (England) Regulations 2012. In the latter, at Regulation 18, it advises that at the start of plan making a local planning authority must notify interested parties of the intent to produce a local plan and also invite them to make comment about potential content.
- 1.2 In making the issues and options report available for public comment we will also advise that it addresses the requirements to meet Regulation 18. The consultation on the issues and options report will, therefore, formally start the process of producing a new local for East Devon.
- 1.3 At this stage we envisage that the new local plan will cover all key policy matters that routinely need to be taken into account in determining planning applications in East Devon. In this respect it is considered that a new local plan should supersede, in its entirety, the existing local plan and also the villages plan. It is though yet to be established if, how or when all or parts of the emerging Cranbrook Plan may be superseded. As an alternative we could adopt an approach of only addressing certain matters in this plan, perhaps just key strategic themes and issues, and then pick up on matters of more detail in one or more subsequent plans. In the issues and options report we ask a question about the

desirability, or otherwise, of producing more than one plan so that this issue can be considered further with the benefit of the consultation responses to inform any decision.

2 Local Development Scheme

- 2.1 The timetable for producing the new local plan will need to feature in a document called a Local Development Scheme (LDS). This is a simple timetabled plan of planning policy documents that we intend to produce. There is a separate LDS paper that goes to this committee meeting and then on to Council. It sets out the proposed new LDS, though over time it is likely to need updating.

3 Content and format of the draft issues and options report

- 3.1 In producing the issues and options report we have sought to identify the key issues that could be relevant to address through a new local plan and for these issues, where bigger scale alternative policy choices or approaches may exist, we have sought to set these out in questions. In some questions we have sought to gauge respondent's degree or level of support for themes or approaches that may run through plan preparation.
- 3.2 The issues and options report majors on a number of key topic matters that could, in their own right, form chapter headings in a future local plan. It also raises issues around, and asks questions about, the strategy for distribution of future development in the district and highlight differing generic types of site developments and seeks views on these. At this stage of consultation specific possible development sites options are not being consulted on, we have not put lines on maps and asked if people would like to see things built inside them. This issues and options consultation is, therefore, about matters in principle, more detailed matters and specific possible development sites will be addressed at a later stage in plan making.
- 3.3 There will frequently be a tension in any consultation document between keeping it short and simple, which should typically encourage greater levels of response or making it complex and longer as may be seen appropriate for what can be a technically complex planning document or matter. As drafted and pitched we think that we have struck an appropriate balance between the two.

4 How and when we will consult

- 4.1 The intention is that we will use on-line technology, as far as possible, to undertake the consultation. A separate report to this committee sets out more detail through a proposed consultation strategy. We will aim to make the issues and options report as widely available as possible to anyone to comment on, whether individuals or private, public or voluntary sector organisations or bodies. There will be no limits placed on who can comment.
- 4.2 The issues and options report will be produced in pdf format, so anyone wanting to view a paper copy (or on-screen equivalent) can do so. The questions in the document will also be available in pdf format and people can if they wish submit written responses to us. We will, however, strenuously and actively be encouraging people to complete an on-line questionnaire form where they can. The answers in any paper copies received will need to

be input into software by officers and this could become a time consuming exercise, hence the very clear attraction of receiving on-line responses.

- 4.3 At the present time, for undertaking the consultation, working with STRATA to have appropriate software in place to enable the consultation materials to be viewed in an easy to read and accessible format. In the draft issues and options document we have included questions in a range of differing styles. We would hope that whatever software we use it will be compatible with the questions as laid out. However, if compatibility matters arise there may be a need to adjust question format after committee to suit the systems used. Committee approval is sought to undertake such adjustments.
- 4.4 Extensive effort will be put into the design of the planning policy web sites to encourage active engagement in the consultation. We hope to use a software system called Storybook which will be new to the council. The software will be used to set out sections of the issues and options report in attractive blocks of information with hyper-links to relevant questions.
- 4.5 Our intent is that consultation will run from Monday 18 January 2021 for an eight week period concluding at mid-day on Monday 15 March 2021. Eight weeks is more appropriate than the usual six week period on account of the limitations that Covid places on delivering more pro-active face-to-face engagements events. To start consultation, and specifically have all systems in place on the 18 January 2021, may prove challenging but we hope it will be possible and will prove to be realistic.
- 4.6 We will aim to process all feedback from the consultation as speedily as possible and to prepare a feedback report that will come back to Strategic Planning Committee in late Spring 2021. However, ability to feedback in a speedy manner will partly depend on the number of responses we receive, how many are on-line, how extensive or otherwise 'other comments' are and the amount of and nature of feedback received that is not submitted in response to the actual questions asked.
- 4.7 It is often the case that some respondents to planning policy consultation exercises will not respond to questionnaires or even if they do will provide extra information as well. Frequently it will be respondents that are promoting land for development that will adopt this approach but also it may be specialist interest groups or respondents opposing a specific proposal. In questionnaire analysis it will typically not be possible to incorporate such responses, but we will summarise issues raised and report back on them.
- 4.8 We will work on the basis that all responses received will be public documents and published on our Council web site, in accordance with our own privacy standards. However, in exceptional circumstances there may be valid reasons as to why a response or respondent details should be kept as confidential. A case-by-case assessment will be undertaken in respect of confidentiality issues.

5 The Duty to Cooperate

- 5.1 Planning legislation requires that we work with neighbouring local authorities, Government agencies, the Local Enterprise and Local Nature partnerships and other public bodies in our plan making activities. The intent under the Duty to Cooperate is to seek to ensure that we

consider strategic cross-boundary matters and issues in a coordinated and planned manner.

- 5.2 The clear expectation is that we will build up a body of knowledge and expertise that will inform our plan and specifically the potential impacts that our plan and policies may have on matters that lie across boundaries in adjoining areas. The potential exists, through the Duty to Cooperate, to establish common policy approaches to development. Furthermore, and amongst other matters, it provides an opportunity for local authorities to share or distribute some of their housing needs or other development needs across and into other local authority areas, though very importantly, only if the others are willing recipients.
- 5.3 The Duty to Cooperate is not a 'duty to agree'. A documented process of discussion and engagement needs to take place but in the end there is no requirement to agree with your neighbours and other partners, rather the requirement is to go through a documented process of joint thinking to establish if it is possible to reach agreement, we would hope that this is the conclusion that can be reached.
- 5.4 Planning legislation does not specify exactly how or when the Duty needs to be met but at plan examination an inspector will consider if and whether procedural and legislative requirements have been addressed. We will need to factor meeting the Duty to Cooperate into our plan making timetables and workloads.
- 5.5 There is a separate Duty to Cooperate paper that goes to committee so summary commentary only is provided in this paper.

6 Other related and on-going work streams to support the local plan

- 6.1 To support the local plan production there are additional work streams that are and will be ongoing as the issues and options report is consulted on and after its consultation is concluded. Alongside consulting in this issues and options report we are also intending to consult on the following items with separate reports on each also coming to this committee meeting;
- **Housing and Employment Land Availability Assessment** – which invites people to submit sites that they consider may be suitable for development; and
 - **Sustainability Appraisal scoping report** - which is the first stage of work on what will be a series of evolving reports that will identify potential positive and negative environmental, social and economic impact that may result from emerging drafts and the final plan.
- 6.2 We will also need to undertake or commission from consultants a number of studies that will need to be completed, or at least some draft conclusions drawn, in order to make progress with producing a draft version of the local plan. Some of the work areas are specialist in nature and the Council may lack expertise, hence the need to buy-in outside help. In some cases work can be done in house where resources permit. Listed below are studies that maybe needed over the next twelve months and beyond to support the local plan, where outside advise may need to be bought in this is noted:
- a) **Habitat regulation assessment and mitigation** – there is a legal requirement for plans to be assessed under the Habitat Regulations if or where development

could impact on the highest tier of wildlife sites (that is Special Areas of Conservation, Special Protection Areas and Ramsar sites). This work is specialist in nature, as is identifying potential mitigation, and the expectation is that specialist consultancy advice will need to be bought in. This is one specific area where collaborative working with neighbouring authorities can be especially important and we already have long established joint working practices.

- b) **Employment land study** – specifically to assess the deliverability of any current and proposed new employment sites. We have some expertise ‘in-house’ but may also need to buy in consultancy support.
- c) **Strategic Flood Risk assessment** – this work will look at potential long term flooding issues. We are reviewing current evidence that we hold but we may also need to buy-in further expert assessment.
- d) **Viability assessment** – there is a requirement, the importance of which has increased, for local plans to be subject to viability assessment to demonstrate that expectations and policies in a plan are commercially viable and sound.
- e) **Local landscape area studies** – if the new local plan, like the previous one, is to have local landscape designations such as coastal protection areas or green wedge designations then site areas and boundaries will need to be justified through assessment work. Staff time dependent we would envisage doing this work in-house.
- f) **Built-up Area Boundary study** – if we are to retain Built-up Area Boundaries in a future plan there will need to be assessment work undertaken to justify their positioning. We would envisage building on work already undertaken for the villages plan and would plan to do this in-house.
- g) **Gypsy and traveller accommodation needs study** – past needs assessment work is becoming increasingly dated and may need replacing. Staff resources dependent we would hope to do this work in-house.
- h) **Planning for low/zero carbon** – we have a substantial body of technical reporting in this work area though lack specialist policy officer expertise in the subject matter. It may be a work area that requires us to buy in outside expertise, though in part this could depend on emerging and evolving policy choices.
- i) **Urban design and master planning** – larger scale development sites, in particular, benefit from careful urban design and master planning work. This may be undertaken outside of local plan and policy production, but to inform and justify planning policy and site allocation boundaries, if not more specific details, there are some good arguments to undertake some work at least in parallel with policy production. The Council has only 1 urban designer on staff and may need to buy-in external help. It is relevant to note that if proposed Government planning reforms are implemented it could be that there will be a very significant expectation of an increase in urban design and master planning work for local planning authorities.
- j) **Town centre viability studies** – with a focus falling on promoting town centres, and current major challenges that town centres are facing, we may need to refresh and overhaul what is becoming dated evidence that we currently hold. Buying in external advice may be required.

- k) **Transport studies** – large scale development proposals and/or the cumulative impacts of many smaller development schemes may require some detailed transport impact assessment work. External advice may need to be bought in, however, requirements will only really become clearer as possible policy choices are more fully investigated.

- 6.3 It should be noted that this is not a definitive list of all tasks that need doing; other studies and work streams will almost inevitably be required. Ideally for any policy in a local plan we should be able to point to relevant evidence that backs up and justifies that policy. Where any policy refers to an allocation on a map or policy line drawn on a map we should ideally also have evidence that justifies why that line or boundary is drawn in a particular position or to a particular alignment. Though where other bodies define sites, for example Sites of Special Scientific Interest or Areas of Outstanding Natural Beauty, then it would only be relevant to justify any specific wording that we use in policy that relate to these.
- 6.4 It is also the case that the level of evidence to justify policies and/or map based boundaries can depend on the degree to which there are realistic choices that can be made over alternatives and the degree to which Government guidance, policy or legislation may clearly determine or strongly lead to a particular (perhaps inevitable) policy conclusion.
- 6.5 In all respects evidence needs to be proportionate to the job that it is seeking to do. There has been past criticism that local plans can sometimes have too much evidence behind them, or perhaps more precisely evidence reports that do far more than justify a plan policy when, in so far as a local plan is concerned, it is justification of the policy that matters. We will need to carefully consider what evidence is needed to inform potential policy choices and actual content as plan production progresses.

7 Timetable and Gantt chart for local plan production

- 7.1 In order to progress local plan production at speed a refined timetable for plan making work has been established. The Gantt chart on the following page sets out in timetable form the key tasks and steps in preparation of the local plan and also how the timetable for producing the Housing and Employment Land Availability Assessment (HELAA) feeds in. It has been prepared taking into account Members comments on engagement at the meeting of the committee on 20th October and the additional staff resource. As a result it is a hybrid of the two options previously presented to Members.

- 7.2 It is highlighted that there are a substantial number of tasks that need to be undertaken in order to get a plan to Examination and Adoption. These tasks (bar the HELAA work) are not shown on the Gantt chart; to do so would make it very long and complex. However, some of these tasks are already highlighted and discussed in this report and it is important to recognise that in many cases tasks will need to be completed at set times in order to feed into the local plan work overall and to allow subsequent stages of plan making to progress.
- 7.3 In the Gantt chart tasks are set out in sequential order and for visual display purposes they are typically shown as separated from one another by a calendar month, as such they are shown with abrupt start and end points. In practice some tasks may fall in the same months and there may be some degree of overlapping time scales. In other cases it may be that longer time periods are needed to complete one task before another is undertaken. This may be the case where lead-in times could be lengthy, perhaps for example because of committee report timetabling considerations. The HELAA work is critical, at least for the next twelve months (i.e. for work in 2021), as it is needed alongside other work, such as the sustainability appraisal, in order to inform the selection of site allocations for development for inclusion in a draft local plan. The HELAA is one of the tasks where we need to draw on technical assistance and support outside of the council. The timetable set out on the Gantt chart is seen as being close to the quickest reasonable timescale that plan making can progress.
- 7.4 The Gantt chart has a block of activities that fall under the title of 'East Devon Local Plan – Timetable Core Tasks'. These are the key steps identified to take a local plan from the Issues and Options consultation, starting in January 2021, to a suggested adoption in early 2024. The timetable shows adoption in February 2024, but in reality the further into the distance you look the more speculative any dates become. There are invariably unknowns in the plan making process that can impact on timelines, one of these is - if, when or whether the Government may change the planning and plan making system. Any changes could have at least minor and quite possibly major impacts on the local plan.
- 7.5 It is important to note that after the plan is submitted for examination it is the Inspector that is largely in charge of timetables, the best we can do is give an indication of the possible speed at which examination may progress.
- 7.6 The Gantt chart is hopefully, for most tasks, self-explanatory. In it are a number of references to 'on-going' work by officers. This 'on-going' work relates to assessment and evaluation work, evidence gathering, report writing and producing plan text, as well as responding to queries and a whole range of associated work-streams.
- 7.7 In the Gantt chart the HELAA conclusions are fed into plan making in late 2021. They will be used alongside other assessment work, notably the Sustainability Appraisal, to provide a body of evidence to help inform choices made on which sites to allocate or identify for development. Committee needs to be aware that the next local plan we are producing will need to allocate sufficient land to accommodate several thousand additional new homes.
- 7.8 The latest housing monitoring report, from the Council, to a starting base date of 1 April 2020 showed that under current local plan policy there is a predicted 11,945 new homes that will be built from the 1 April 2020 to the 31 March 2031. If we apply a minimum annual average requirement for 918 homes per to be built in East Devon, to accord with current

(from 2021 onward) Government requirements, and apply this figure from 1 April 2020 to the 31 March 2040 then it would generate a 20 year total minimum need for 18,360 new homes. If we work on the basis that the 11,945 homes are committed to be built we can deduct this figure from a total need of 18,360 to generate a net residual need of an additional 6,415 new homes that a new local plan would need to provide. This figure, however, comes with significant 'health warnings':

- it assumes that the 11,945 homes will be delivered, of course if this number were exceeded then the residual would fall, but if a 'committed' site did not come forward then the residual number would go up;
- it does not build in any kind of buffer, over and above planning to meet a minimum, a buffer factor would increase the need to be planned for; and
- potentially most significantly it assumes the 918 figure will remain in place. Government consultation in autumn 2022 on amending the methodology to revise housing numbers generated an annual average requirement figure of 1,614 for East Devon. Replacing the 918 figure with 1,614 would generate a need for a new local plan, over the 2020 to 2040 period, to accommodate a residual extra 20,334 new homes.

It should be noted that the dates given above are illustrative only and at this stage a start date and an end date for a new local plan are not yet determined.

- 7.9 In terms of planning to accommodate new homes drawing lines on maps stating that this land is earmarked for new house building (or it is earmarked for some other form of development) can prove to be very contentious. It was not that many years ago that an East Devon local plan received over 15,000 objections to the allocation of land for the development of what is now Cranbrook. Objections and challenges to development site allocations do not, however, just come in for big sites. Medium and smaller scale development sites can also be contentious and generate much concern and challenge.
- 7.10 In the Gantt chart we identify that Committee will receive an officer report in December 2021 that will set out details of all of the sites that have been submitted or proposed by land owners and agents for development, along with an assessment of these sites and recommendations on which sites may be appropriate for allocation in the emerging local plan. In the timetable as drafted we have allowed three months, from January 2022 to March 2022, for further debate and discussion to take place on possible site choices. It is suggested that Members should lead this debate and they may wish to liaise and consult with their local communities, perhaps parish and town councils, in drawing their conclusions. There will be some scope to amend site choices at later stages of plan making but it is suggested that the onus really should be, at later stages, on making minor rather than major changes.
- 7.11 It should be noted that officer recommendations to members on which sites to allocate will be informed by discussions on an overall strategy for development, that will identify the types of areas or locations that are suitable and appropriate across East Devon for development and the scale or amount of such development. In undertaking this work it will help establish those areas that are less suitable or not suitable for development. Site selection should not, therefore, be based on just the consideration of sites themselves, the choices made should fit into a bigger picture and wider objectives and outcomes that a

District wide plan is seeking to deliver. Good plan making should typically start with establishing an overall distribution strategy first and then site choices should align with that strategy.

- 7.12 In 2022 it is proposed that the plan strategy and site choices will feature in a draft local plan along with a full suite of draft plan policies. The expectation is that the draft plan will be consulted on in late spring/early summer 2022 (the timetable shows this as May/June 2022). Feedback from this consultation, alongside any further evidence gathering and refinement and associated work, will need to inform the final local plan ('final' in so far as the Council is concerned). This 'final' local plan is then approved for 'Publication' and this plan goes out for public scrutiny and any comments made at this stage as well as the plan itself and any evidence and supporting documents that informed the plan are submitted to the Planning Inspectorate and the plan is subject to Examination. It is almost inevitable that the Planning Inspector will propose modifications to the plan and there will need to be consultation on these. Finally, we trust, the Inspector will issue a report and the plan can be adopted.

8 Future meetings of Strategic Planning Committee

- 8.1 Given the high workload in producing a new local plan it is likely that Strategic Planning Committee will need to meet on a more regular basis over at least the next year and probably the next two years. At busier times the expectation is that committee may need to meet on a monthly basis or perhaps even more frequently. This is so that Members can be appraised of emerging evidence and can guide officers on how they wish to proceed. It is likely that some of these extra meetings may be more discussion based and involve inviting other parties to present or advise to inform debate rather than focusing on a particular recommendation or decision.
- 8.2 It is important to note that servicing these additional meetings will put a strain on resources in terms of both officer and Member time. The preparation of reports, briefing papers and presentations will impact on officer resources and of course Member time in reviewing them and debating the issues at the meeting. There is also clear impacts on democratic and legal services in providing the necessary administrative and legal support to enable additional meetings to go ahead.

9 Cutting out tasks to make plan production quicker

- 9.1 It is reiterated that to produce a plan to the timetables set out will be challenging, though it is also highlighted that there are ways that the above timetable can move more quickly, should members consider that a plan should be prepared more quickly. Some options are highlighted below.
- 9.2 **Do not do a draft plan** – there is no legal requirement to do a draft plan and consult on it. It is considered that it is good practice as any consultation feedback can highlight possible concerns in a plan before doing the 'real thing'. However, not all council's do a draft plan and so long as problems do not arise not doing one could knock around six months off the suggested plan making timetable. However, this presupposes that all goes well and also it may be felt that it is not a sufficiently democratically accountable way to undertake plan

making. It could be seen to lessen scope for public and subsequently member involvement in determining plan content.

- 9.3 **To have less debate on site allocations** – in the timetable as drafted it is proposed that a report will go to Committee in late 2021 (timetabled as December 2021) in which Members will be invited to determine which sites they are minded to show as allocations for development in the draft local plan. Whilst the report would be expected to include officer recommendations, informed by site assessment work, it is assumed that Members will wish to take some time (more than just a single committee meeting) to arrive at their conclusions. Therefore, in the timetable as drafted, there is a three month gap included between this first report on site choices and a subsequent report for early Spring 2022 (shown as being in April 2022) at which the draft plan will be presented to committee with a recommendation for consultation. This period for member debate on site choices was seen as useful to ensure Members could consider potential options and it could also allow potential for what would be speedy engagement with local communities or others. However, if Members are satisfied that relevant site allocation choices can be made in a shorter timeframe then it may knock months off the plan preparation time line. However paperwork to committee could show assessments relating to 300, 400 or perhaps more sites to choose from and so this could be an intensive period of work for Members. In reality it may be difficult to assess how long will be needed and how many additional meetings during this period may be needed until Members have the papers in front of them but this should be highlighted as a potential risk to the timetable if longer than has currently been set aside is needed.
- 9.4 **Plan to produce a basic plan that does not challenge Government policy or convention** – plans invariably take longer to get to adoption if they seek to challenge Government policy or conventional approaches to plan making or plan content. Should Members choose to fully align the plan with all aspects of Government policy, and choose not to go down policy routes that require extra work seeking to challenge such policy, then speedier plan production may be possible. But members would need to be satisfied that this is what they and local communities want.
- 9.5 **Go for a simpler plan** – e.g. covering just strategic policies and then do more detailed plans at a later date. Doing a simpler plan, not covering all matters, could knock time of the production process for a core strategy. But it would mean work in the future on new plan making to address matters not covered in the first instance and often a longer timeframe overall.
- 9.6 This approach could lead to the production of a core strategy potentially similar to the strategic part of the existing local plan including the strategy for growth and key policies to deliver it alongside site allocations. A separate DPD comprising the development management policies could then be produced separately at a later date. Equally it could be split down further with site allocations forming a separate phase of work to the main strategy. It is however considered important to at least establish a strategy for growth and site allocations in the first phase of work to ensure that we maintain the necessary housing land supply. This would then only leave the development management policies to progress at a later date, however this is rarely a controversial element of plan working and is not envisaged to be that resource intensive and so there are little benefits resource wise. In terms of timescales it could save some limited time through the consultation and

examination process but if done separately leads to additional separate consultations which could lead to consultation fatigue as well as the need for a further examination which would be likely to add to cost and the overall timescale. It is therefore considered that progressing all elements as one cohesive package is the best way forward.

10 Taking longer to produce the plan

10.1 The timetable presented is a speedy one as it is understood that this was Members wish but for completeness it is worth highlighting benefits of a longer timescale. It is possible to give a longer period for Member consideration of the emerging plan and specifically site allocation choices. The public consultation we envisage is considered sufficient to fully engage our communities but it could be extended. For example a plan could be informed by pro-active stakeholder events and workshops, 'planning for real' types of exercises could be undertaken or we could train and empower local communities (to some degree at least) to undertake assessment and make recommendations on site allocation choices. However, under the timetable as planned, it is not envisaged that any of these more engaging and hands-on but lengthy types of consultation activities will be realistic or possible.

11 Risk considerations

11.1 There are a number of risk considerations associated with local plan production. Many of these are already highlighted in the early part of this report but drawing these together and further considerations are set out below.

11.2 **Changes to the plan making system** – in the autumn of 2020 the Government advised, through a White Paper, of fundamental proposed changes to the plan making system and planning more generally. If introduced in full and in a speedy manner they would supersede work as currently envisaged on a new local plan. Some of what we have done may be of use and applicable to a new style local plan but it is not clear how much and this could depend on how much progress we make. Whilst the Government have proposed changes to the planning system it is not clear, of course, if these will be made, what they may finally say and indeed when they may happen. It is considered that there is little that can be done to minimise this risk other than to be mindful of the governments proposed changes so that where possible we remain agile in our approach can adapt to the changes as quickly as possible.

11.3 **Changes in resourcing levels** – the timetable for producing a new local plan places considerable demands on officer time and also considerable demands on Member time. Should staffing, financial or other resourcing levels reduce it could jeopardise the ability to produce the plan to the timetable envisaged. The additional resources already agreed by Members will help to minimise this risk but clearly if any members of the team were to leave it will be important that replacements are recruited quickly.

11.4 **Negative public responses to plan proposals** – if there is a negative response by the public to plan proposals, or even if more people comment on the evolving plan than anticipated, it could have timing if not wider impacts or implications. To minimise this risk it will be important that we communicate proposals in an effective way to ensure that public responses are based on accurate information and that proposals are fully explained in a way that is accessible and easy to understand.

11.5 **Local elections in May 2023** – the next local elections are scheduled for May 2023 and in the timetable presented in this report the expectation would be for the plan to be submitted for Examination in early (March) 2023. The local plan could become an election issue. The best way to mitigate this potential risk would be to stick to the timetable as much as possible and minimise slippage so that the plan is as advanced as possible by election time.