

Report to: **Strategic Planning Committee**



Date of Meeting 30 March 2021

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – Committee Work Programme for 2021

Report summary:

This report sets out a proposed work plan to produce a new draft local plan during 2021 and into 2022. The report highlights a series of proposed topic area reports that it is planned to bring to committee over the coming months. The intent being that this work will lead to a draft local plan, which includes preferred land allocations for development, being presented to Committee in December 2021 and for this draft plan, subject to further refinement, going out for public consultation in May 2022.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

- 1) **That Strategic Planning Committee endorse the proposed programme for committee consideration of local plan reports through 2021 and into 2022.**
- 2) **That on the basis of the proposed programme Strategic Planning Committee agree to work towards an early draft local plan for committee consideration in December 2021.**

Reason for recommendation: To advice committee of the work ahead to get to a draft plan consultation in May/June 2022

Officer: Ed Freeman, Service Lead – Planning Strategy and Development Management, e-mail - efreeman@eastdevon.gov.uk, Tel: 01395 517519

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

There are no direct financial implication from the recommendations of this report.

Legal Implications

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

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information - At various points this report refers to a report to Strategic Planning Committee on 15 December 2020, item 96, see:

[Agenda for Strategic Planning Committee on Tuesday, 15th December, 2020, 2.00 pm - East Devon](#)

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 Local plan issues and options report consultation

- 1.1 Members of Strategic Planning Committee will be aware that the new local plan issues and options report was open for consultation responses until the 15 March 2021. A detailed feedback report will be brought to the committee meeting on the 21st April 2021.
- 1.2 The issues and options consultation can be looked upon as the first formal stage of plan making. This committee report sets out a suggested draft programme for carrying forward plan making work throughout the rest of 2021, and in to 2022, with a particular onus on proposed papers to be presented to Strategic Planning Committee.
- 1.3 There are Strategic Planning Committee meetings scheduled for every month of 2021. The proposal is to present a series of topic based papers to each meeting to enable a clear Member steer and instruction on key issues. This, to accord with previously agreed timetables, would allow for the writing of a proposed draft local plan to be presented to members for their initial consideration at a meeting of this committee in December 2021.
- 1.4 We would suggest that this draft local plan should contain preferred policy choices and reasoning and justification for their inclusion as well as a summary commentary on possible realistic alternative choices. The same would also apply for land allocations for development – preferred allocation sites would be shown and alternative options also highlighted. This process of work would neatly dovetail with the Sustainability Appraisal

aspect of plan making as the Sustainability Appraisal needs to look at realistic alternative options and assess them with the assessment process informing (but not determining) policy choices.

2 Committee work plan for 2021

- 2.1 For the monthly meetings we are suggesting the work programme and timetable that is tabled later in this report. It should be noted that the work programme is based around key paper/subject headings. Some of these headings (second column in the table) are the same/similar to the chapter titles that are found in the issues and options report and which may be found in many local plans themselves. However, at this stage nothing is fixed in respect of the plan structure or format. Other headings in the table are more generic or cross-cutting considerations for plan making.
- 2.2 The proposal is that Strategic Planning Committee will receive a topic paper on each of the subject matters in the table, these will link to current evidence documents that are available, are in preparation or which need to be produced (see the next section of this report). Where appropriate relevant papers will set out potential alternative policy options and approaches on each subject matter and will invite member debate around points and options raised.
- 2.3 It is proposed that planning policy officers will prepare papers to present to committee but we will, as well, invite officers from other services and departments of the council to relevant committee meetings to present their thoughts and observations and to set out their aspirations for planning policy. For example there would appear merit in inviting economic development and regeneration staff to meetings debating future economic policies and town centre matters and the countryside and leisure staff to meetings addressing recreation matters. Members may wish to give instruction on whether they see merit in extending any invitations to any other bodies or organisations outside of East Devon District Council, though some degree of caution may be relevant to avoid possible charges of prejudice or bias in the process.
- 2.4 A committee steer on the way forward, in respect of subject matters listed, will be a desirable outcome from each meeting as this steer, or conclusions drawn, will help inform subsequent plan making work and the drafting of the local plan.
- 2.5 It is stressed that the table below is far from definitive of all work matters and papers that will be brought to committee, but it provides a starting point. The table below is a draft timetable and is subject to change.

| Cmte date | Key Papers/ subject | Commentary |
|-------------------|---|--|
| March 2021 | This work programme | Members will be asked to agree the work programme set out in this committee report, including the items listed below. |
| | Urban capacity study | This work will examine the number of new houses that could potentially be accommodated through building inside the existing built-up areas of East Devon towns (early issues and options questionnaire feedback indicates strong support for this approach). |
| April 2021 | Issues and options feedback report | Committee will receive a feedback report (probably initial findings or possibly, if time permits, a final version) on comments received during the issues and options consultation. |
| | Sustainability Appraisal Feedback | This report will provide information on feedback on the Sustainability Appraisal scoping report consultation and more information on how the work may inform policy development. |
| | Scoping and Vision of the plan | This paper will set out commentary and suggested options for the scope of the plan. Specifically whether it should cover all issues or only selected matters, for example strategic policies only, with more detailed policy matters to follow in subsequent plans or documents. It would also consider the vision for the plan and seek Members views on their key aspirations for what they want the plan to achieve for the district. |
| May 2021 | Final issues and options feedback report | If not already completed a final feedback report on issues and options consultation will be presented to members. |
| | Housing development needs | This paper, with options within, will set out future housing need, ranging from minimum levels required to meet Government requirements to higher levels that might deliver additional benefits. Whilst final conclusions will not necessarily be expected at this stage of plan making an early member steer on numbers and wider housing issues would be desirable. |
| | Employment development needs | This paper will present options in respect of the general distribution and nature of future employment and job generating developments. An early steer on thinking, perhaps rather than final conclusions, would be sought. |
| | Development of a spatial distribution strategy - Introduction | This paper will introduce and highlight the importance of establishing a strategy for the spatial distribution of development. In crude terms what, broadly speaking, should be built where and why. This would include consideration of issues around levels of growth at existing towns and villages. Some possible options, with pros and cons and related issues highlighted, will be presented to committee for discussion. Specific further comment on the importance of the early establishing of a plan strategy are set out below this table. |

| Cmte date | Key Papers/ subject | Commentary |
|------------------|---|---|
| June 2021 | Proposed format and structure of a new local plan | To help with initial drafting of the local plan it will be desirable to get an early steer on the proposed format and structure of the draft local plan – this might be as simple as proposed chapter headings and bullet points on matters that each chapter may address. |
| | HELAA site submissions | The Housing and Employment Site Availability Assessment (HELAA) process allows people to submit sites that they consider would be appropriate for development. A paper will be bought to Committee providing details of each site that has been submitted (but this paper will not include a full evaluation of the sites – this comes later in the year). |
| | Local plan relationship with neighbourhood plans | Neighbourhood plans set out, by Parish areas, local community policies to be used in determining planning applications, they also set out broader community aspirations. This paper will set out more details on Neighbouring Plans and potential options and approaches that could be used to take them into account to inform local plan production. |
| July 2021 | Refining a spatial distribution strategy | This paper (if needed) will follow on from an earlier introductory paper and will seek further debate and help refine a spatial distribution strategy for development. It may well be that further papers and meetings are needed on the subject matter but as many detailed policy matters flow from having a strategy it is a critical matter to be determined before plan making can fully progress. |
| | A strategy and approach to future consultation | In this paper we will set out a proposed approach to consultation to align with the approach to plan making this actual committee report proposes. Members may, however, wish to promote additional consultation and engagement or refine the suggested approach. |
| Aug 2021 | Design considerations | The Government are placing increasing importance on design considerations. It may be that in local plan policy, or potentially subsequent documents, that we will need to give considerable thought to site specific (as well as more generic) design guidance. It may be that all or many allocated development sites will need or would benefit from having bespoke Design Codes to inform development. This paper will advise on emerging Government thinking and issues for a new local plan. |
| | Built heritage considerations | Many matters relating to built heritage concerns are addressed through national policy and legislation. There will, however, be scope to address some more detailed concerns through local plan policy as well as considering how, if and where heritage considerations could support other and wider local plan policy initiatives. |

| Cmte date | Key Papers/ subject | Commentary |
|------------------|--|---|
| Sept 2021 | Biodiversity | National policy establishes much of the biodiversity protection within the planning systems. There are, however, key local factors that we need to consider, including: <ul style="list-style-type: none"> • Plan assessment under the Habitat Regulations; • Mitigation of impacts of development on the highest tier of wildlife sites; • Biodiversity net gain (how development should lead to net wildlife improvements rather than losses). |
| | Landscape | We will need to consider landscape policies in general for the plan and how landscape considerations are taken into account through plan making. We will also need to give consideration to possible local landscape (and similar) designations such as coastal landscape protection areas and green wedges. |
| | Health considerations | Health is likely to be an overarching theme for the plan picked up under visioning and strategy work, rather than necessarily having its own policies. It will, however, be desirable to ensure that emerging policies adequately address health concerns. |
| | Coastal erosion and roll back policies | We will need to establish the full extent of the coastline of East Devon that is vulnerable to being lost to the sea and to establish planning policy for development that may or may not be permissible in vulnerable areas, as well as other related policy responses. |
| | Sports and recreation considerations | Key work to inform policy around sport and recreation may be the Playing Pitch Strategy and a Built Sports Facilities Strategy. The former will be produced by the Planning Policy team and for the latter there is a Leisure Strategy being produced for the Council/East Devon. It is hoped that this strategy will meet Sport England and local plan making requirements. |
| Oct 2021 | Infrastructure | There are two key elements to consider in respect of infrastructure: <ul style="list-style-type: none"> • Existing deficiencies and what the planning system may be able to do about them; and • The infrastructure needs arising from new development. To address the first through the local plan generates considerable challenges and in reality the planning system is better structured to address the second. |
| | Transport | Transport may be looked upon as a critical subset of infrastructure. There may be major strategic objectives and aspirations in respect of transport in the plan but the expectation is that a lot of the work will be based around ensuring the deliverability of the plan and robustness, in transport terms, of proposed site allocations. |
| | Climate change | Climate change and policies around minimising carbon emissions and adaptation to impacts are likely to be a major consideration in the local plan. These are likely to inform the overall vision and strategy of the plan and so will be picked up under these elements with this paper highlighting detailed policy considerations relating to climate change issues. |

| Cmte date | Key Papers/ subject | Commentary |
|-----------------------------|------------------------------------|--|
| | HELAA feedback report | If available/completed final feedback will be given on the HELAA outputs. The HELAA will be essential to inform local plan allocation choices and if there are delays in this work stream it could impact on the plan making timetables overall. |
| Nov 2021 | Town centres and retail | This paper will address planning policy matters in respect of town centres – including in respect of retail, mixed use development and the future role and function of town centres. It will also consider retail more generally. |
| | Cranbrook | There is a Cranbrook Plan in production that will set out development policies for the town into the 2030s. This paper will consider if and how a local plan may address planning policies for the town and the relationship with the Cranbrook Plan. |
| | Built-up Area Boundaries | If (assuming) we are to include Built-up Area Boundaries (or something similar) around towns and some (to be determined) villages of East Devon then these will need to be defined. In this paper we will show conclusions drawn, using the methodology (adapted as appropriate) that is used for the Villages Plan to establish draft new local plan boundaries for towns and villages. |
| | Site allocation choices | Recommended preferred site allocation choices, to align with an agreed plan strategy, will be presented to members drawing from HELAA outputs (assuming they are available) and other assessments. At this stage it is proposed that Built-up Area Boundaries (defined through a separate work stream) will be adjusted (outward) to incorporate land allocation choices. |
| Dec 2021 | Draft local plan | In December 2021 the intent is that members will receive a proposed draft plan which will include proposed preferred site allocations for development. It is envisaged that where appropriate it would also include a number of alternative site options considered through the sustainability appraisal that would be highlighted in consultation materials. This would ensure that communities are given an opportunity to comment on site options where there are genuine options to be considered. |
| Jan/ Feb/ March 2022 | Follow on items from 2021 workload | Dates for committee meetings in January, February and March 2022 are to be determined. The expectation is that there will be a number of matters to resolve from the 2021 workload to allow for completion of the final draft plan. This is likely to include completion of the evidence base to support the draft plan, refinement of the draft plan itself and potential for further engagement with Members prior to production of a final draft. |

| Cmte date | Key Papers/ subject | Commentary |
|------------|-----------------------------------|--|
| April 2022 | Draft local plan for consultation | <p>Approval will be sought for consultation on the draft plan in May and June 2022.</p> <p>It is suggested that this draft plan (effectively a preferred approach style document) should comprise of preferred local plan policy and preferred land allocations for development as well as succinct commentary on alternative policy approaches and alternative land allocations (and other map based policy boundaries) for comment.</p> <p>We would hope that this version of the plan will be close to the final version, the Publication draft that will go out for comment in 2023. It is highlighted, however, that there will be further work required in 2022, of particular significance will be a viability assessment. This will need to assess whether the plan, as a whole and component parts, as drafted adds-up in commercial viability terms. It may be the policy changes will need to be made if there are viability concerns, or assessment may indicate further 'gains' can be made.</p> |

2.8 It is reiterated that the time lines for undertaking the work are tight and key decisions will need to be made in a timely manner to allow for plan production to be followed through in a logical, coherent and structured manner. Should committee wish to adjust the work schedule then concerns should be flagged up at the earliest stage noting that changes could have significant knock-on implications.

2.9 We have tried to construct the schedule to spread topics out over the year ahead so as to not overload committee meetings or officer workloads. Key papers come early in the schedule and many papers are timed to allow for evidence documents and related work areas to have been completed or to have made substantive progress.

3 Evidence documents

3.1 The strategy and policies of a Local Plan need to be informed by evidence – we need robust logic to justify plan policy wording as well as evidence to justify where any policy related line or boundary is drawn on a map. For example if the new plan includes a Green Wedge policy (the current local plan has such a policy that seeks to avoid development that would lead to the coalescence or merging together of settlements) we will need evidence and justification for the policy wording and also evidence to justify boundary lines drawn on a map. This land area consideration, however, does not apply where areas are defined by or through Government, for example Sites of Special Scientific Interest or the Areas of Outstanding Natural Beauty.

- 3.2 It is only a starting assessment, and will need to be adjusted over time, but tabled as Appendix 1 to this report is a schedule of evidence documents that have been produced or we consider may be needed in order to justify local plan policy.
- 3.3 It can be seen that the list is long and ultimately not all reports may be needed and some may end up being quite short. However, there is the likelihood that other subject matters requiring evidence will emerge as plan making progresses. This will be especially so if it is deemed desirable to challenge Government policy or go down less conventional policy routes.
- 3.4 In the ideal world all evidence documents would be in place and published (with cross-references made in the plan) before draft local plan consultation starts, in accordance with the projected timetable, of May 2022. This is, however, not going to be feasible and we will need to progress on the basis of the information we do hold. In the draft plan we may need to refer to emerging evidence or advise that work will be ongoing to justify or amend certain policies.

4 The importance of establishing a local plan strategy at an early stage of plan making

- 4.1 It is highly desirable to start to develop a strategy for the plan, most importantly in respect of the distribution of development, at an early stage of plan making. A strategy should establish broad locations that are appropriate for given forms of development and set out reasons why. It may well establish the scale of development that may be appropriate for given towns and potential favoured directions of growth for a town (e.g. northerly, westerly, southerly etc.), for example identifying where differing approximate levels of new house building would be appropriate. A plan strategy would not be expected to go into details, and probably not identify specific sites for development, though it may identify broad areas of search of land for development, perhaps especially so if large scale schemes such as a new town are proposed.
- 4.2 The existing local plan focusses a large part of the overall development in East Devon on land close to the city of Exeter. For the new plan it will be relevant to consider whether this strategy should be carried forward or perhaps accelerated. If so there should be a logic for doing so, or conversely a preferred approach may be to shift, perhaps significantly, away from a focus of building close to Exeter, if this is the case there will need to be a logic for doing so.
- 4.3 Over recent years the towns of East Devon have seen varying levels of growth. Compared to population levels at the turn of the century Ottery St Mary and Axminster have seen the most new housing built, in other towns the comparative house building levels have been lower. A plan strategy will need to consider what levels of development should go to differing towns, what underpinning logic might exist for any town to grow and what that growth may seek to achieve and why.
- 4.4 The same logic will also apply to potential for development at villages and in the countryside - why or why not build and what is development seeking to achieve and why or what might the outcomes be.
- 4.5 A critical point about having a coherent strategy for development is that it then informs and sets a template for the development of the plan overall, the topics within it and site specific

policies in the plan. This is particularly relevant when it comes to making land allocations for development. However, if the strategy were to change as plan making progresses, especially so if it changes significantly, then previous and more detailed work may need to be revisited and this could have knock-on timing implications.

5 Possible challenges of allocating land for development

- 5.1 Identifying sites to be allocated or developed in the local plan may well prove to be the most challenging and contentious element of the plan making process. Past experience suggests that site allocations can generate more comment and objection through plan making than other elements of plan policy.
- 5.2 However, by having a coherent strategy for the distribution of development it should make the allocation process more reasoned and logical (though that is not to say that it will stop objections!). A coherent strategy will help focus the site selection process to the types of locations that are most appropriate for development and which will help deliver the outcomes (i.e. the strategy) that the plan is seeking to achieve. There is though something of a 'chicken and egg' element at play that we do need to be aware of - a general location, perhaps for example a town that supports a very good range of facilities, may in-principle be a strategically appropriate place for further development. However, if there are limited site choices at that town and there are lots of constraints and significant adverse development impacts might occur then, it might, despite in-principle good logic for development not be a location to build at (or at least we might focus development to address specific identified needs).
- 5.3 In the timetable as set out we have indicated that members will have early information, with some limited initial officer assessment, around sites that have been submitted through the HELAA process. This work will give an early indication of the range of sites that might be potential land allocations in the plan. It is stressed, however, that an independent panel will look in more detail at technical matters around credibility for development – this will include such matters as can utility services be secured, is highway access achievable and might development be commercially viable or credible. It is stressed that the HELAA panel do not recommend or decide which sites should be allocated for development, but what they do is provide technical information for use by members of this council, when weighed against other considerations, to use in making their decisions on which sites to allocate.
- 5.4 In the proposed timetable for work, and looking at the committee report from December 2020 (see specifically paragraph 7.10), we advise that an officer report in December 2021 will recommend sites for allocation in the draft local plan. Members will need to be satisfied that they are happy with this approach and if not should advise of any alternative process that they wish to follow.
- 5.5 Whilst they would be officer recommendations, as at December 2021, we have set out a three month period, January 2022 to March 2022, during which there is space to review and assess sites, undertake any engagement that might be seen as beneficial and otherwise identify any revisions that could be seen as appropriate. This work would lead onto allocated sites to feature in a draft plan to be consulted on in May and June 2022.

6 Conclusions

- 6.1 This report sets out what is likely to be a demanding work programme if previously agreed plan making timetables are to be followed. To meet the work programme there will need to be key decisions made on a regular basis to steer and guide the policy and plan making process. If there is a desire to undertake more work or do more consultation it could well impact on plan timetables and this may be especially so in respect of choices of land for allocation for development.
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Appendix 1 – Potential evidence and other requirements – as identified at March 2022- need to produce a new local plan

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
|---|---|---|---|
| Overarching work areas and related studies | Housing and Employment Land Availability Assessment (HELAA) | The HELAA invites people to promote land for development. A call for sites runs to 15 March 2021 and through the remainder of the year appraisal work on site submissions will be undertaken. The HELAA outputs will form part of the evidence to justify allocations of land for development. | This work is being undertaken by staff in the Planning Policy team, though sites will be assessed by an external panel. |
| | Sustainability Appraisal (SA) | The SA is an ongoing iterative process through plan production that evaluates potential sustainability impacts of emerging strategy and policy choices. SA reports will be published as plan production progresses and consultation on a scoping report runs to 15 March 2021. | This work is being undertaken by staff in the Planning Policy team. |
| | Habitat Regulation Assessment (HRA) | HRA is required where development or its impacts could adversely affect the highest tier of wildlife sites. There will need to be cross-authority-boundary coordination on this work which will be ongoing through plan production. | The expectation is that we will need to appoint consultants to undertake this specialist work. |
| | Habitat Regulation - Mitigation Strategy | Allied to Habitat Regulation Assessment will be the need for mitigation strategy/ies to allow for development to go ahead. For the River Exe, Pebblebeds and Dawlish Warren the clear expectation is continued working with Exeter and Teignbridge on a new or rolled forward strategy. We may also, however, now need a mitigation strategy for the River Axe, potentially jointly agreed with Dorset and Somerset authorities. | The expectation is that we will need to appoint consultants to undertake this specialist work. |
| | Equalities Impact Assessment | An equality impact assessment will ensure that the local plan, including its policies and processes in production, specifically engagement and consultation, do not unlawfully discriminate against any persons with protected characteristics. | This work is being undertaken by staff in the Planning Policy team. |
| | Viability Assessment | Viability assessment of the full local plan will need to assess all policies and land allocations to demonstrate that individual elements of the plan, and the plan as a whole, is commercially viable and can therefore be expected to be implemented. It is highlighted that a start should be made on this work in 2021 but significant progress will be unlikely until after policies and allocation choices start to be formed, the bulk of the work will, therefore take place in 2022. | The expectation is that consultants will need to be employed to undertake this work. |
| | Duty to Cooperate | This cross-boundary co-operation work is likely to include a series of agreements on key strategic topic matters with the bodies having a role/relevance to those topic matters. | The expectation is that this work will be done in-house as plan making progresses. |

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
|-------------------------|---|--|---|
| | Appraisal of the previous local plan policy | The intent, to support new plan production, is to undertake a review of all of the policies of the existing local plan in respect of - effectiveness, level of use and compatibility with Government policy and legislation. This will inform potential to roll them forward, if appropriate or desired, into a new plan. | This work is being undertaken by staff in the Planning Policy team. |
| | Audit trail report of work undertaken in preparing the new local plan | We will produce a regularly updated overarching report that forms an audit trail on work undertaken and planned to support production of the new local plan. This report will aim to be succinct with an onus on providing links to more detailed reports. | This work is being undertaken by staff in the Planning Policy team. |
| | Town/villages/rural area visioning study | Consideration will need to be given to the possible need for visioning studies for town/village/rural areas to inform possible policy approaches that may be taken for any specific areas or locations. One or more studies may be most relevant if we have specific local area policies for particular settlements. | If undertaken this work will be produced (or lead) by the planning policy team. |
| | Site allocations study | We will consider the need, for every development site we allocate in the plan, for whether there should be an evidence report to show appropriateness (drawing for example on work on - HELAA, SA , compatibility with plan strategy, viability, transport considerations, 'just being a decent site', etc.). Need some thought to if and how this work will work best and overlaps with other work areas. | If undertaken this work will be produced (or lead) by the planning policy team. |
| | Monitoring indicators report | It will be relevant to give early thought to whether we need a specific study around monitoring indicators, for example linked with SA and HRA work. Though any work could come through as part of the policy development work. | If undertaken this work will be produced by the planning policy team. |
| | Consultation statement | A consultation statement, to be ongoing work, will show how we have met the plan making regulations and good practice. It will specifically include details of how we have consulted, representations received, summary issues raised and the Council response. | This work is and will be undertaken by staff in the Planning Policy team. |
| Spatial Strategy | Role and Function of Settlements | This report will examine how settlements work and function. It will consider population and employment, community facilities and retail, transport and connectivity; and then groups settlements into a hierarchy where they share similar characteristics. | This work is being undertaken by staff in the Planning Policy team. |
| | Distribution strategy | This report will consider issues around the future distribution of development across East Devon - how much of what types of development should go to what types of location and why. The report links to the role and functions of settlement study and should be an early report to committee. | This work is being undertaken by staff in the Planning Policy team. |

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
|-----------------------------|---|--|---|
| Health and wellbeing | To date no specific study is identified as needed on health and wellbeing issues. | Health and wellbeing is seen as a cross-cutting matter that will feature in many other subject and policy matters and at this stage a stand-alone evidence report on the subject is not seen as being needed. | If work were deemed appropriate it is suggested that it should be undertaken by the planning policy team. |
| Climate change | We will need to undertake a review of climate change evidence requirements. | There were various studies undertaken for GESP. These will need to be reviewed to see if there are any additional requirements to support potential local plan policy approaches. | We will need to keep under review possible need for consultant appointment. |
| Housing | Local Housing Needs Assessment | The consultants ORS have completed a local housing needs assessment for East Devon. This may be supplemented by a further study that covers East Devon, Exeter, Teignbridge and Mid Devon and any work might need a future (light touch) update. | Should further work be deemed as necessary it is envisaged that consultants would be appointed. |
| | Gypsy and traveller accommodation needs study | We need to understand the accommodation needs of the gypsy and traveller community. A study that covers East Devon, Exeter, Teignbridge and Mid Devon may be commissioned, or alternatively we may look to do an East Devon only assessment. | If assessment covers a larger area we would look to appoint consultants. At an East Devon only level it could be appropriate for the planning policy team to do the work. |
| | Urban Capacity Study | This study looks at the possible level of housing development that could be accommodated on infill sites within the existing built-up areas of East Devon towns. | This work has been completed by the planning policy team at the Council. |
| | Custom and self-build demand assessment | We will need new evidence of self-build needs/aspirations if we wish to have specific policy on the matter. | We may be able to undertake needs assessment in the planning policy team though it may need external consultant appointment. |
| | Housing to support rural living | We already have policies that support housing to support rural businesses but consideration will need to be given to any necessary refinement of these policies. There are also options for new policy around alternative lifestyles and self-sufficiency where if taken forward the production of an evidence document to justify the policy approach would be appropriate. | This work would be done by the planning policy team. |
| | Nationally Described Space Standards | An option is to have policy that sets minimum size standards for new residential development. We have followed this route in the Cranbrook Plan and to include policy in the new local plan would require an evidence report. | This work would be undertaken by staff in the Planning Policy team. |
| | Employment | Economic Development Needs Assessment | There is an existing Greater Exeter study and this may be updated. If not updated we need to consider whether we need further bespoke East Devon work though at this stage this is not seen as essential. |

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
|-----------------------------------|-----------------------------------|---|---|
| | Employment site analysis | We have identified a benefit in undertaking a bespoke study looking at existing and potential employment sites in East Devon in respect of potential commercial demand, viability and their deliverability. | If further work is deemed necessary then it is envisaged that it would be through an external commission. |
| | Tourism study | We will need to give consideration to whether we need a tourism study or studies. We have a number of tourism policies in the existing local plan but now lack up to date evidence to inform or justify policies going forward. Further assessment will need to be undertaken of need for tourism policies in the plan. | If further work is deemed necessary then consideration will need to be given to whether we need to employ consultants. |
| | Hotel/Tourism protection areas | Study to identify areas/locations we may wish to resist the loss of existing tourism faculties. | This work will be undertaken by staff in the Planning Policy team. |
| | Transformational sectors study | The Greater Exeter Strategic Plan, in its draft form, had policy promoting new transformational employment sectors (these related to hi-tech industries and businesses involved in such fields as managing data and green energy production). Should we seek to specifically and actively promote these sectors though policy in the local plan we may need new or refreshed evidence. | Any extra work needed, especially if of a technical nature, may need to be externally commissioned. |
| | Rural economy | Depending on how we approach rural economy matters through local plan policy we may need to produce or commission evidence to justify the approach being taken. This, however will be a matter for debate at a later stage. | We will need to keep under review any evidence needs and whether planning policy staff can complete tasks or if an external commission is needed. |
| Town Centres (Inc. retail) | Retail evidence report | There was a previous, high level, GESP commissioned study that may need refreshing or we may need to commission new work. Impacts of Covid and the changing nature of retailing and town centre functioning may, however, point to the need for a radical overhaul of planning approaches and a new set of evidence requirements to address ways forward. Evidence needs will need to be kept under review. | If further studies are needed the expectation is that external work will need to be commissioned. |
| | Retail frontages study | We have identified a need to undertake a retail/other uses frontage study in town centres. Such work will be needed to form evidence to define and justify any policy boundaries for town centres and retail/commercial use frontage policies. | This work would be undertaken by staff in the Planning Policy team. |

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
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| | Other and non-town centre retail uses assessment | We will need to keep under review the potential need for any other evidence requirements that may come forward in respect of retail or town centre areas. For example there are suggestions that town centres should accommodate more mixed use and community/social uses as well as housing. Evidence may be needed for any future policy approaches or choices. | We will need to keep under review any evidence needs and whether planning policy staff can complete tasks or if an external commission is needed. |
| Design - spaces and buildings | At this stage there are no specific studies that are identified as needed - but we will keep matters under review. | There is national design guidance that will be sufficient to meet current and local plan making specific needs. However, for specific allocations (choosing sites and specific policy wording) we may need an urban design input to aid consideration of what land should be allocated. Looking forward the Council may need to produce a number of development site specific design codes but unless the timetable for Local Plan production is very much extended this is likely to come forward as supplementary planning documents. | We will need to keep under review any evidence needs and at this stage we would envisage that planning policy staff and other council teams can complete tasks for the Local Plan, however design coding of site allocations is likely to need some external commissions. |
| Built heritage and historic environment | At this stage there are no specific studies that are identified as needed - but we will keep matters under review. | At the present time we would expect to rely on national policy and guidance supported by existing East Devon specific work (for example the Heritage Strategy) to justify and meet our needs. However we may need specific assistance in respect of assessing and making development site allocations and reviewing potential for adverse impacts. There are also specialist areas that may warrant some specific consideration, for example in respect of policy that could address carbon reduction measures in historic buildings. | We will need to keep under review any evidence needs and whether planning policy staff can complete tasks or if an external commission is needed. |
| Natural Environment | Coastal Change Management Area study | We have erosion/shoreline change evidence for the eastern half of East Devon and the intent would be to extend this to cover the western half of the district. | It may be possible to undertake some of this work in the planning policy team though an external commission will be needed for technically complex elements. |
| | Strategic Flood Risk Assessment (SFRA) | This work is seen as essential to support plans. Stage 1 of an SFRA essentially involves assimilating existing data and gives a broad steer on whether development proposals may generate flooding concerns. If no significant concerns are identified then going in to Stage 2 of an SFRA is not necessary. | We would hope that a Stage 1 SFRA can be completed by Planning Policy staff with inputs from other Council staff. If we need to go to Stage 2 then external consultants may need to be commissioned. |

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
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| | Undeveloped coast study | We have existing policy to protect the undeveloped coast and if we are to have similar policy coverage in a new plan we should have an evidence report to justify policy wording and also for the actual designated areas. | This work will be undertaken by planning policy staff. |
| | Water cycle study | This study will show if there are constraints to development in respect of - flooding, water supply or dealing with waste water - whether there are barriers to development that need new infrastructure and also if there are opportunities for natural flood risk management - if there are no constraints or evidence gaps we don't have to do more detailed work. | This work will be started (and maybe completed) by Planning Policy staff. However if it becomes technically complex we may need to appoint external consultants. |
| | Green wedge study | If we are to have Green Wedges (or similar) in the new local plan then we should have a report to justify policy boundaries. | This work will be undertaken by planning policy staff. |
| | Clyst Valley Regional Park | It would be hoped that existing master planning and related work will meet evidence needs - but partly may depend on what we want to do with policy/outcomes sought. | We will work on the basis, to start at least, that appropriate and sufficient evidence exists. |
| | Local landscape designations | If we have local landscape designations in the plan we will need evidence to support and justify them. | This work will be undertaken by planning policy staff. |
| | Nature Delivery Strategy | The current expectation is that there will be a Devon wide Nature Delivery Strategy. We would hope that this will be produced in a timely manner and meet our policy needs. Supplementary work may, however, also be required. | We will work on the basis, to start at least, that appropriate and sufficient evidence will exist. However there may be a need for supplementary evidence gathering if so we would trust by planning policy staff). |
| | Biodiversity net gain study | Legislation is due that will require a biodiversity net gain after development. We will need to consider if and how local policy will assist delivery of requirements and potentially supersede any Government requirements. | Devon County Council are undertaking work and we would look to use this and further develop evidence in the policy team. |
| | Strategic wildlife corridors study | We will need to investigate any evidence requirements and policy outcomes. | This work will be undertaken by planning policy staff. |
| Transport | Overarching transport study | We will need to investigate whether there is the need for any overarching transport, movement and accessibility study for East Devon. | To be determined, though there is likely to be considerable Devon County Council evidence. |
| | Links to Exeter study | We will need to consider possible need for studies specifically looking at links into Exeter, and impacts on and around the western edges of East Devon, in respect of road, rail, buses, bicycle, and walking? | To be determined. |

| Plan subject | Specific evidence study or report | Commentary | Who is doing the work |
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| Infrastructure and facilities | Digital infrastructure | There is the need to consider whether any digital infrastructure evidence documents are required. | To be determined. |
| | Infrastructure Delivery Plan | This plan will identify infrastructure projects required alongside developments proposed in the Local Plan | This work will be undertaken by planning policy staff. |
| | Cemetery provision | There may need to be a study looking at cemetery provision and capacity. | If needed this work will be undertaken by Planning Policy staff. |
| Sport and Recreation | Playing Pitch Strategy | A Playing Pitch Strategy is in production. | This work will be undertaken by staff in the Planning Policy team. |
| | Open space study | Need to consider if we need an update on the previous assessment. | This work, if required, will be undertaken by staff in the Planning Policy team. |
| | Leisure Strategy / Built Sports Facilities Strategy | There may be a need for a Sport England compatible Built Sports Facilities Strategy. The Council may, however, meet needs through ongoing work. | To be determined. |
| Built-up Area Boundaries | Village Built-up Area Boundary Study | It is envisaged, at this stage, that we will do a light touch review of the work for the Villages Plan on boundaries. | This work will be undertaken by staff in the Planning Policy team. |
| | Town Built-up Area Boundary Study | Using the villages boundary methodology we would apply the same logic to assessing town boundaries. | This work will be undertaken by staff in the Planning Policy team. |