

**Report to:** **Strategic Planning Committee**

**Date of Meeting:** Tuesday 27 November 2018

**Public Document:** Yes

**Exemption:** None



**Review date for release** This is an update and resources report on the Greater Exeter Strategic Plan, further reports on this plan will come to committee in the coming months and years.

**Agenda item:** 9

**Subject:** **Update report on progress, resource and staffing matters for the Greater Exeter Strategic Plan and also an update on the work programme for future East Devon Local Plan production.**

**Purpose of report:** This report updates committee of ongoing work on the Greater Exeter Strategic Plan and the plan production timetable. The report also highlights financial and staffing resource considerations in respect of taking the plan forward and through to adoption. In addition reference is made to the work programme for a new East Devon local plan.

**Recommendation:** **The Strategic Planning Committee is recommended to:**

- 1. Note the future work programme for Greater Exeter Strategic Plan production.**
- 2. Note the proposed work plan for new East Devon Local Plan production in the light of Greater Exeter Strategic Plan timetables.**
- 3. Endorses that a joint budget be established for the 2019/2020 financial year of £150,000 to fund the continued preparation of the necessary evidence base for the plan on the basis of an equal split of £30,000 per district/city/county Council level authority.**
- 4. Endorses the principle of retention of the two additional members of staff to provide sufficient capacity in the Planning Policy Team to continue to work on the Greater Exeter Strategic Plan and backfilling within the planning policy team (non-GESP) to provide coverage for the seconded officer to GESP. In so doing this will avoid delays in production of a new Local Plan and planned Development Plan Documents (DPD's) and Supplementary Planning Documents (SPD's) and other planning policy work.**

**The Strategic Planning Committee recommends to Cabinet:**

- 1. To include the sum of £30,000 in the draft budget for 2019/20 as this Council's contribution to the joint budget**

and to include a sum of £74,800 in the draft budgets for 2019/2020 and 2020/21 each year for staffing costs. Of the total budget requested of £179,600 over the two years, £97,000 will be met from reserves leaving a net additional sum requested of £82,600 required in 2020/21.

<b>Reason for recommendation:</b>	To gain endorsement for the future work programme and to ensure financial and staffing resources from East Devon District Council are available to contribute to plan production.
<b>Officer:</b>	Ed Freeman, Service Lead – Strategic Planning and Development Management
<b>Financial implications:</b>	The funding implications are mentioned within the above recommendation and should be considered against the financial pressures the council is expected to experience in the financial year 20/21 as highlighted within the medium term financial plan.
<b>Legal implications:</b>	Co-operation and joint working is promoted by the NPPF. Economies of scale in commissioning evidence in support of plan policies together with the requirement to keep local plan policies under review are all met by the approach as set out in this report. There are no legal implications other than as set out in the report.
<b>Equalities impact:</b>	Low Impact Low Impact
<b>Risk:</b>	Low Risk  As endorsement is sought for continuation of current work there is a low identified risk associated with this report.
<b>Links to background information:</b>	<ul style="list-style-type: none"> <li>• Links to background reports and information are included in the body of the report.</li> </ul>
<b>Link to Council Plan:</b>	The Greater Exeter Strategic Plan has links to all Council priorities.

## 1. Introduction

### 1.1 Members will be aware that the following authorities:

- East Devon District Council;
- Exeter City Council;
- Mid Devon District Council;
- Teignbridge District Council; and
- Devon County Council

working in partnership are producing the Greater Exeter Strategic Plan (GESP). GESP will be a strategic plan, it will address higher level, bigger and more significant and cross-boundary planning matters across the areas of planning jurisdiction of the three District Council's and Exeter City. Devon County Council are a partner in plan production but are not a planning authority in respect of policy matters that GESP will address.

- 2.1 GESP will include planning policies of relevance across the whole of East Devon, but there will need to be further policy coverage in the District. A new East Devon Local Plan is to be produced and there will be future policy documents, Neighbourhood Plans and other guidance documents to inform the implementation of policy.

## **2 Logic and reasons for producing the GESP**

- 2.1 It is worth highlighting some of the key considerations and reasons that lie behind the production of GESP. In being a strategic higher level plan GESP will be able to take a view over a wider geographical area than just a single local authority. This wider geographic perspective is very important as the way people live their lives and where they work and play, how business functions, transport systems work and how any number of other factors and issues operate do not align with local Government boundaries. By working and thinking across a larger geographical area it becomes possible to plan in a far more collective and holistic manner that recognises the interactions that exist across differing areas and locations whilst taking into account the differing characteristics of different areas, their strengths and weakness and the potential they offer.
- 2.2 Government policy increasingly encourages joint working across local authority areas and joint plans are increasingly common. On a local level Plymouth, South Hams and West Devon are close to completing a joint plan, West Dorset and Weymouth & Portland have an adopted joint local plan, and are producing a new one, whilst Torridge and North Devon are on the verge of adopting a joint plan. More widely many large urban conurbations are producing joint plans, relatively close by these include Bristol and surrounding authorities, and an interesting example of joint plan making can be found in Norwich where the city, which is very similar in size to Exeter, is partnering with neighbouring rural authorities (not dissimilar to those in the GESP area) and Norfolk County Council on production of a joint plan. The city of Oxford (a city not too much bigger than Exeter) and surrounding Districts are another example where joint plan making is proceeding.
- 2.3 Government funding and grant aiding is increasingly going to those authorities that are working on joint plans, especially where they are proposing or need to accommodate higher levels of growth. Such funding can form one of the key means to secure future infrastructure provision. Furthermore should the GESP Council's wish to promote more innovative and interventionist approaches to delivery of planning policy proposals then there should be far more potential and leverage by having a joint plan and going through joint plan making processes than each authorities doing their own plan.
- 2.4 On the financial side there is also scope to save money through joint plan making as it can provide for economies of scale when it comes to commissioning evidence reports and studies as well as plan writing, undertaking consultation and plan examination. A joint plan, with the joint team in place as currently exists, also provides a greater collective pool of knowledge and skills to draw on and the ability for specific officers and members to develop specialist skills in technically complex matters that can then support policy work and be shared across a number of separate authorities.
- 2.5 Notwithstanding the clear positives associated with GESP production it is relevant to highlight possible negative considerations. Of key relevance is the fact that GESP will

require the buy-in and sign-off from four separate planning authorities. These four authorities may have some differing priorities and concerns and be working to differing time scales. For GESP to make sense it will need to be a plan that each of the four authorities can clearly see the resulting collective benefits that will be delivered whilst also having relevant and appropriate benefits for their own area. However, there could be the need to accept that there may be some details that would not necessarily be the first choice of an authority but that overall greater gains will outweigh possible smaller local compromises.

### **3 Work to date and past consultation on the GESP**

- 3.1 In July 2016 the five local authorities jointly committed to production of the GESP and officers from the Councils commenced work on evidence production and allied tasks. This early work led to production of an Issues consultation report, highlighting some of the key issues and considerations relevant to the GESP area, and possible policy approaches for the plan. The Issues report was consulted on from 27 February 2017 to 10 April 2017. Further information can be found on the GESP website at:  
<https://www.gesp.org.uk/consultations/issues/>
- 3.2 In Spring 2017, following approval by the five partner Council's, a team, drawing on staff from each Council, was formed to work on production of GESP. Two officers were appointed to this team from East Devon District Council, one a secondment from an existing post and the other a new post, both, at present, are two year contracts that expire on 16 April 2019. The joint GESP team, who are based in the offices of Exeter City Council, have produced and commissioned a number of evidence documents, they have completed (though not yet published) a Housing and Employment Land Availability Assessment (HELAA) and they have undertaken a wide range of additional tasks to support GESP production.

### **4 Previously proposed autumn 2018 GESP consultation**

- 4.1 Strategic Planning Committee of this Council, on the 4 September 2018, received a report proposing consultation on a GESP document called "Our New Vision and How We Make It Real". This document contained a new (refined) vision for the GESP and more information on homes and infrastructure matters. It should be noted that this proposed consultation did not form part of the earlier work programmes but was felt to have merit in respect of gathering public feedback in order to inform overall GESP production. This report was scheduled to go to committees of the four planning authorities in the GESP partnership; each committee was recommended to approve the document for consultation. For East Devon see paperwork at:  
<http://eastdevon.gov.uk/media/2581497/040918strategicplanningcombinedagenda.pdf>  
and minutes at:  
<http://eastdevon.gov.uk/media/2602297/040918-strategic-planning-committee-minutes.pdf>
- 4.2 The Strategic Planning Committee of East Devon District Council determined, however, not to approve the document for consultation and resolved (as noted in the minutes):
1. that before consultation, the consultation document "Our New Vision and How We Make It Real" be amended to:

- a. include reference to assisting the rural community;
- b. include reference to increasing healthcare provision in response to demographic changes;
- c. include entry level sports provision and sports hub;
- d. include provision of passing loop at Whimble, and other transport provision;
- e. include a review of energy needs and how to supply them;
- f. include an indication of forward funding; and
- g. include a clear set of questions that provide information that can be analysed.

2. That before consultation, the amended document be considered at a future meeting of the Strategic Planning Committee.

4.3 After the East Devon District Council committee, and the determination to not undertake the consultation as proposed, there was a meeting of the leaders and chief executives (or in some cases their representatives) to discuss next stages and the way forward. This meeting, which is one of the regularly held Growth and Development Board meetings, determined that it was not appropriate to resurrect and amend the proposed autumn 2018 consultation. Rather the intention now is to undertake a further, more comprehensive, additional stage of consultation in June 2019 (further details are provided below).

## **5 Future timetable for GESP production alongside East Devon Local Plan work stages**

5.1 In the light of the additional consultation work proposed for June 2019 there is a need to amend the GESP timetable and the stages of work, as tabled over the page. To place future local plan work in the context of GESP timetables there is also commentary provided in the table, final column, on equivalent stages suggested for local plan work along with dates for this work.

5.2 This committee report does not comment in detail on matters that a new local plan for East Devon may address or go into great depth on production time lines. In the coming months a detailed action plan for production of a new East Devon Local Plan will be produced. It is highlighted, however, that GESP will only cover some of the bigger planning issues and make strategic (large scale) land allocations for development. A new local plan will need to address a wide range of subject matters and detailed policy considerations that do not feature in the GESP and a local plan will also need to make smaller scale (and potentially some larger) land allocations for development.

5.3 Whilst the GESP timeline will impact on making speedy progress on production of a new local plan (especially in respect of documents that we may make available for public consultation) there are a number of areas of work to support a local plan that can and will be started early on. These include evidence gathering as well as undertaking a critical review of existing local plan policies in light of the new NPPF and other new and emerging considerations. Such a review will help inform the appropriateness of rolling past policies forward or whether they need moderate or fundamental changes, or perhaps are not needed at all and whether there are new issues we need to address.

- 5.4 Members will note that the timeline for adoption of a Local Plan Review is a long way off but it is important to bear in mind that the GESP will supersede large sections of the currently adopted Local Plan and so in many respects the Local Plan Review is already well underway.

Date for GESP work	Key stage of GESP work with commentary	Commentary with dates for corresponding East Devon Local Plan work
February 2017	<b>Consultation on the Issues report</b> This work has been completed and a feedback report produced.	<i>The expectation is that there will be an issues report consultation on a new local plan though at this stage it is suggested this should also contain alternative development options (including possible site development options). It would seem inappropriate to start this consultation until after consultation on a draft GESP plan has concluded and consultation feedback is analysed. Therefore a date for this consultation of Spring 2020 is identified.</i>
June 2019	<b>Consultation on draft policies and site options</b> It is proposed that a series of potential options will be presented for public comment. The options may set out main policies proposed for inclusion in the plan along with options for sites or land areas for development. This further consultation will provide the means to address the concern expressed by members in respect of the now abandoned “Our New Vision and How We Make It Real” proposed consultation. It would be expected, however, to cover other issues as well.	<i>For a new local plan, assuming the above issues and options work is undertaken, this stage of work would not be needed. However, there would be positive potential in undertaking various wider public engagement events and such engagement could run through 2020.</i>
November 2019	<b>Consultation on full draft plan</b> Feedback from the draft policies and site options consultation, and further evidence gathering and assessment, will inform a full draft version of the plan which will go out for public consultation.	<i>We would envisage producing and consulting on a full draft of the local plan. It would, however, be inappropriate to undertake this prior to submission of the GESP for examination, so an Autumn 2021 date is proposed.</i>
February 2021	<b>Publication (Proposed Submission)</b> The publication stages is the point at which GESP in what the GESP authorities agree is the final form is made available for public comment.	<i>It would be inappropriate to go to publication of a new local plan before the adoption of the GESP. On this basis a Summer 2022 date is proposed for publication.</i>

Date for GESP work	Key stage of GESP work with commentary	Commentary with dates for corresponding East Devon Local Plan work
July 2021	<b>Submission</b> All comments made at the publication stage along with the plan itself and supporting evidence is submitted for examination (the paperwork is sent to the Planning Inspectorate).	<i>Submission of a new local plan to the Inspectorate for Examination would be likely to be in late 2022.</i>
September 2021	<b>Inspector's Hearings</b> The examination of the plan starts at the point of submission, however, a key part of the examination will be hearing sessions at which the inspector will hear verbal evidence in respect of the plan and objections to it. It is normal practice for inspectors to require modifications to be made to plans for them to be deemed to be sound and appropriate for adoption and these modifications will need to be consulted on.	<i>Hearing sessions for a new local plan would be expected in early 2023.</i>
April 2022	<b>Adoption</b> The examination concludes at the point at which the Inspector issues his or her final report. The plan can then be adopted by the Councils. Once a plan is adopted there are follow on tasks that are required in respect of final document production and publicity.	<i>Adoption of a new local may be expected in Summer 2023.</i>



## **6 Keeping planning policy up to date**

- 6.1 There is a need to have up to date planning policy in place with this being an issue stressed in the National Planning Policy Framework, see for example paragraph 33 – which references the need for plan review “*at least once every five years*”, at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)
- 6.2 Noting that GESP now has an envisaged adoption date of April 2022 it is valuable to look at current local plan coverage across the four GESP planning authorities. In respect of how up to date plans will be:
- The East Devon Local Plan was adopted in January 2016 - GESP adoption would be more than six years after the local plan adoption;
  - The Exeter Core Strategy was adopted in February 2012 - GESP adoption would be more than ten years after local plan adoption;
  - Mid Devon currently have a Local Plan in production with adoption expected in 2019 - on assumption of the local plan being adopted the GESP adoption would be within the five year period; and
  - The Teignbridge Local Plan was adopted in May 2014 - GESP adoption would be around eight years after local plan adoption.
- 6.3 Given the fact that local plan policy coverage, across a number of the GESP planning authorities, including East Devon, is or will become dated, it can be seen to be of great importance to work to overall GESP plan production timetables. Linked to this is a need for partners to maintain a 5 year housing land supply wherever possible during the production of the GESP. Exeter already cannot show a 5 year supply and as such are pressing for rapid progress to be made on GESP.
- 6.4 GESP will cover some major but not all policy matters and therefore there can be expected to be some policy areas, as addressed in the existing East Devon Local Plan, which will be very out of date should timely progress on a new local plan for the District not proceed quite rapidly. The time lines set out in this report for a new local plan are seen as the quickest reasonable possible timescales to work to given the GESP timetable.

## **7 New local plan considerations in the absence of GESP**

- 7.1 Should GESP not proceed (depending on when it is determined that it should not proceed) the timelines set out in this report for production of a new East Devon Local Plan could be a realistic timetable for work on a local plan that covers all matters (including strategic considerations that might have otherwise been addressed by GESP and other local plan matters). Should GESP be further delayed, however, it would be expected that this could delay production of a new East Devon Local Plan.

- 7.2 In terms of resources the pursuit of a Local Plan Review in the absence of GESP would involve similar resources with the two officers that currently form part of the GESP team being needed to provide the required resources to progress a full Local Plan process. We would of course benefit from the evidence work already undertaken by the GESP team and the savings that have already been achieved by jointly undertaking this work. There may also be potential for further work to be undertaken in partnership but it is likely that there would be additional costs in producing further evidence and additional examination costs in the event of the GESP not progressing to adoption.
- 7.3 In the absence of GESP members of this Council would need, at an early stage, to consider their aspirations and vision for a new local plan. GESP is being prepared as a plan that is ambitious in the outcomes it seeks and will have a vision for the whole Greater Exeter area that the strategy will be built around. Inevitably a Local Plan Review following a GESP will follow through on the detailed and more local aspects of that vision. In the event that GESP did not proceed Members would need to consider a vision for the Local Plan to include the wider strategic issues currently being considered through GESP. There is however an expectation that the draft vision for GESP is one that is shared by the partner authorities and therefore a vision for a non-GESP Local Plan Review would identify similar issues and aspirations. The main difference may be that rather than being delivered jointly slightly different approaches may be taken in the different authorities and discussed and co-ordinated through the duty to co-operate.
- 7.4 The role of the Council in the future delivery of the GESP is an issue that has yet to be fully addressed but there is growing evidence of a need for a more interventionist and proactive approach to delivery than any of the partner authorities have previously taken. This is endorsed by government guidance and reports which similarly indicate the need for this approach in order to secure high quality spaces and sustainable communities from large scale developments. Undertaking the investments and accepting the risks of this approach without the GESP partnership would be a very different proposition both in terms of the financial undertaking for the Council but also in terms of the potential to lever in funding from other sources. Government funding is increasingly focused around joint initiatives and working between authorities and so the opportunities for a single authority to access the levels of funding accessed in the past by EDDC to deliver infrastructure at Cranbrook no longer exist. In the event of the GESP not progressing the Council would need to carefully consider their approach in this area and tailor the vision and aspirations for the plan to reflect our commitment and ability to deliver.
- 7.5 A local plan that promotes significant change and one that seeks to place the council as a interventionist player in plan delivery could be expected to be more complex than one that seeks to take neither of these roles. In simple terms a plan that does not seek to bring about significant changes and one that does not set out an interventionist role for the Council will be much simpler, quicker and cheaper to produce.

## **8 Proposed East Devon District Council future staffing contributions to GESP**

- 8.1 Being a partner in GESP production requires East Devon District Council to have staff in the GESP team. At present the Council have two staff members, a Senior Planning Officer

post and a Planning Officer post, in the GESP team. Both posts are, however, temporary and are due to terminate on the 16 April 2019.

- 8.2 It will be necessary for East Devon District Council to retain the input of two full-time staff members into GESP; therefore this committee report recommends funding the extension of these contracts for a further two years. This will take the contracts of employment from 17 April 2019 through to 16 April 2021. At this time it is unclear what capacity the GESP team will need going into examination of the plan and for post-examination work, however there may be a need for a further extension of these contracts once this is known.
- 8.3 By extending these GESP posts for a further two year period it will ensure that officers of East Devon District Council will be contributing to GESP all the way through to plan examination. Assurance of staff inputs and continuity of a staff involvement from this Council, in the GESP team, is critical for ensuring that plan production through to and beyond adoption is successfully undertaken.
- 8.4 It should be noted that member endorsement for ongoing staff involvement and employment in GESP will provide the basis for seeking to secure additional funding and budgets for completion of GESP. Furthermore one of the current GESP post-holders has been seconded from an existing post in the planning policy team and their position has been 'back-filled' by an additional temporary planning officer post. Through ensuring that the GESP posts are secured and funded through to 2021 it will provide a basis for submitting paperwork to ensure that the current temporary planning officer post, working directly in the planning policy team, can be extended, also for two years. The extension of the temporary planning officer post, with the post holder working directly in the policy team, will ensure that policy team work on production of Supplementary Planning Documents, other guidance and strategy documents can continue in an appropriate and timely manner. Extension will also ensure that resources will be available to make a start on early work for a new local plan for East Devon and that Neighbourhood Plan production is supported.

## **9 Financial implications and future contributions to GESP**

- 9.1 There will be cost implications for the future production of GESP. To date, to cover the Years 2016/17, 2017/18 and 2018/19 the Council has provided £140,000 to GESP, though this figure does not include salaries for the two East Devon officers dedicated to GESP work.
- 9.2 Looking forward, from 2019 through to 2022 (i.e. for a three year period) there will be further costs associated with completion and adoption of GESP. The major cost areas identified, from an East Devon District Council perspective, are:
- **Employment of staff** – continued employment of two planning policy officers for two years, and to include 'on-costs' and an allowance built in for future pay rises, will cost in the region of £170,000. However one of the GESP staff members has a permanent contract of employment with the Council and he is seconded into the GESP team. On the basis that he actually has an East Devon salary already the net extra cost to the Council for the two posts, for two years, is a little over an estimated

£87,000 – or around £43,500 per year. As one of the posts is a secondment it was also necessary to recruit on a fixed term contract cover for that post and it is proposed that this arrangement is also extended for a further two years to enable progress on DPD's, SPD's and other policy work to progress unaffected. This would bring the total additional cost per annum to £74,800.

- **Technical and evidence work on GESP production** – much of the cost on technical work to date has been spent on employing consultants (many work areas are very specialist in nature and do require specific specialist skill sets). Going forward there is likely to be less need for employment of consultants and total monies for technical work on GESP is estimated at £150,000. A five way equal split across the partner authorities would lead to an East Devon District Council contribution of £30,000.
- **Cost of the examination** – the Planning Inspectorate charge for examinations and also there will be a need for the partners authorities to employ (either directly or on a consultancy basis) a Programme Officer to assist the Inspector in the smooth and efficient running of the Examination.
- **Other costs** – there will be further smaller costs also associated with GESP production but these will be covered in the above estimates or will be met through other existing budgets. Costs could include – printing, postage, room hire for exhibitions and the like. There will also be costs associated with member involvement and decision making in respect of GESP, but again these are assumed to be covered from existing Council budgets.

9.3 Endorsement by this Strategic Planning Committee to future working on GESP will form a basis for a submission through the current budget rounds for GESP funding.

9.4 There may be Government funding to contribute to GESP and GESP related projects, schemes and proposals. Where the Government (or others) invite bids for funding for projects or initiatives these are scrutinised with respect to possible GESP relevance. Any monies secured through bids may offset some of the funding that would otherwise fall to the partner local authorities or it could provide scope for undertaking additional work. It should also be noted that developments secured as a consequence of GESP proposals, such a new house building, may secure additional Government funds, for example in the form of New Homes Bonus.