

Report to: **Strategic Planning Committee**

Date of Meeting: 22nd October 2019

Public Document: Yes

Exemption: None

Review date for release None



Subject: **Greater Exeter Strategic Plan – Updated Scope and Timetable**

Purpose of report: This report is intended to update Members on discussions that have taken place between the leaders of the partner authorities involved in the Greater Exeter Strategic Plan (GESP) regarding the future scope and timetable for production of the GESP. The report seeks Members agreement to a draft scope and timetable which if agreed by all partner authorities will form the basis for progressing work on the GESP.

Recommendation: **That Members agree the proposed scope and timetable for the Greater Exeter Strategic Plan as detailed in this report and summarised in Appendix 1.**

Reason for recommendation: The proposed scope and timetable are considered to be the best approach to deliver the Greater Exeter Strategic Plan and Members endorsement of this approach is needed to ensure that work on the GESP can move forward.

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Financial implications: As a collaboration between the four councils the funding of the Greater Exeter Strategic Plan has in the past and should in the future continue to be shared by the four councils with the shared funding mechanism to be established once the scope and timetable has been agreed.

Legal implications: The Council is legally required to maintain and update a Local Development Scheme(LDS) to reflect the amended timescales proposed within the report, if approved these will come forward at the December 2019 Strategic Planning Committee. There are no legal implications other than as set out within the report.

Equalities impact: Low Impact
The report relates to the form and process for production of a development plan for the area and therefore does not directly address any equalities issues.

Climate change: High Impact
By its nature, climate change is something which cannot be considered in one isolated area, but can only be tackled through work which reflects cross-boundary transport movements and other strategic matters. Involvement in the Greater Exeter Strategic Plan provides this opportunity to consider carbon emission and climate change impacts of development and transport over a wider area. Because of this, involvement in GESP is likely to be beneficial to climate change policy compared with seeking to achieve carbon neutrality in just one district.

The key impacts will arise from the specific policies and strategy chosen, however. These implications will arise as the GESP is prepared.

Risk: Low Risk

Links to background information:

- Initial report to Strategic Planning Committee on GESP: <https://bit.ly/2o9qc0V>
- GESP scoping and Resources Report: <https://bit.ly/2mAqBZM>
- Principles for Accommodating the Future Growth Needs of East Devon report: <https://bit.ly/2p1GbyA>
- GESP website: www.gesp.org.uk

Link to Council Plan: [Encouraging communities to be outstanding; Developing an outstanding local economy; Delivering and promoting our outstanding environment; Continuously improving to be an outstanding council.](#)

Introduction

On various dates in mid-2016 the four councils of East Devon, Exeter, Mid Devon and Teignbridge agreed formally to prepare a statutory joint local plan to be known as the Greater Exeter Strategic Plan (GESP). A joint planning team has been set up and work has progressed on various aspects of the plan.

The reasons given for preparing a joint plan between the councils are still highly relevant today and are summarised below:

- The Greater Exeter area geography reflects economic, housing and transport patterns. Coordinated planning and infrastructure provision will be enhanced to the wider benefit of councils taking part.
- Related to this, the legal requirement on local plans to be prepared under the Duty to Cooperate will be significantly easier than through the separate preparation of individual plans by the four councils on differing timetables.
- Strategic decisions taken previously by the Regional Spatial Strategy and Structure Plans have now been effectively completed, so a new vision and strategy for the area is needed.
- Joint working and planning gives the Greater Exeter authorities greater profile and weight when applying for national and regional infrastructure funding and in other relationships with other bodies.

The case for a joint plan was explained in detail in a report to Strategic Planning Committee on 21st July 2016 and is reproduced below for Members ease of reference:

“A joint plan has a number of clear benefits aside from simply meeting the duty to co-operate and the policy vacuum formed by the withdrawal of the RSS and Devon Structure Plan. The cross border co-ordination of issues particularly those associated with the growth of Exeter as the region’s city is going to be key for Exeter and its neighbouring authorities. The impact of Exeter is felt beyond the boundaries of the city on a regional scale in terms of economy, housing need and transportation pattern. This area of influence has expanded to encompass East Devon, Mid Devon and Teignbridge. Together with Exeter City itself, this wider area can now be regarded as ‘Greater Exeter’ and therefore there is a clear benefit of planning across functional geography.

Exeter is running out of space to accommodate the levels of economic growth that is envisaged and the housing needs that are likely to be generated. Significant growth is already being accommodated in East Devon in the form of Cranbrook, Science Park and Sky Park as well as in Teignbridge where large scale housing sites are being developed to the south west of the city. How such growth is accommodated and how this is co-ordinated between the authorities will be key moving forwards while regardless of which authority's area development is accommodated in there is a need to co-ordinate the delivery of infrastructure to support the development that is needed. Infrastructure such as the main road network for example runs between the different authorities and impacts on each area and so how the pressures that are placed on this infrastructure is dealt with is important to each authority and needs to be co-ordinated. Clearly Devon County Council also has a key role in terms of transport infrastructure, education and social care and proposes acting in a partnership role to support the Greater Exeter authorities in strategic plan making. Economic, environmental and other planning pressures and processes do not respect administrative boundaries and joint decision-making on these strategic matters will enable us to better plan for the future of the area.

A co-ordinated approach is also necessary when looking to secure government funding and investment. Individual authorities can no longer access the funding required to deliver the necessary infrastructure for large scale developments such as a new community like Cranbrook on their own. Such funding no longer exists with the government now expecting a co-ordinated approach between authorities and devolution bids to secure large scale funding. A joint plan will give a clear strategy for the area that will assist in accessing funding for infrastructure. In addition it would provide a clear strategy for growth to support the emerging devolution bid should this proceed. The Heart of the South West devolution bid highlights a number of challenges facing the LEP area which planning has a key role in addressing. These are:

- Comparative productivity is 29th out of 39 LEP areas
- An aging workforce and major skills shortages reported
- Our performance remains low on key productivity measures: wages, innovation, inward investment exports and global trade
- Disproportionate growth in our older population is placing unsustainable burdens on our services
- Strategic infrastructure has good coverage, but is incomplete
- Insufficient capacity of the road network and motorway junctions
- Uncompetitive travel times to London and the south east
- Incidents and extreme weather threatens transport resilience
- Housing supply not keeping up with demand
- Threats to National Parks and Areas of Outstanding Natural Beauty

These challenges are common to the Greater Exeter area as they are to the wider LEP area and whether the devolution bid proceeds or not a joint strategic plan is considered to be part of the mechanism to addressing these issues that can only really be resolved by working together. A further major benefit of joint working on plan preparation is the cost savings that this presents. Whilst traditionally some local plan evidence has been jointly commissioned, such as the Strategic Housing Market Assessment (across the housing market area), a joint strategic plan would present an opportunity to take this further through the pooling of resources for the commissioning and preparation of evidence. This could lead to significant savings over individual authorities each making separate commissions or separately producing the work. There is also potential for skills and specialisms within the individual authorities to be shared for the benefit of the partnership.

Other authorities have already undertaken joint plan making and it is understood that many of the plans that are currently in production are being produced in partnership between neighbouring authorities. Examples that are similar to the proposed approach for the Greater Exeter area include a joint plan for the Gloucester, Cheltenham and Tewkesbury area and also a plan for the Broadland, Norwich and South Norfolk Council's areas. More locally, joint plan making is already being pursued by North Devon and Torridge and is also taking place in the wider Plymouth area.

Joint plans are finding favour with local plan inspectors and the government's Local Plan Experts Group (LPEG) has also expressed a preference for this approach. The group was established in September 2015 to consider how local plan making can be made more efficient and effective. When the group reported earlier this year they highlighted the importance of joint working particularly in city regions where the administrative boundaries of the principal urban area mean that it cannot meet its housing needs. The Greater Exeter area is an example where this is increasingly the case and joint working will be necessary to address this issue."

Current Local Development Scheme (LDS)

The description and timetable of GESP is contained within a common section in the four LDS as follows:

"The Greater Exeter Strategic Plan will cover the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge (i.e. those Councils' administrative areas excluding Dartmoor National Park). It will be prepared jointly by those four local planning authorities with the support of Devon County Council under Section 28 of the Planning and Compulsory Purchase Act. It will:

- **set an overall vision and strategy for the development of the area in the context of national and other high level policy;**
- **include overarching, cross-boundary and strategic targets, policies and proposals for development and conservation;**
- **guide the overall level and distribution of development;**
- **make strategic development and infrastructure proposals;**
- **contain other strategic policies necessary to implement the vision and strategy; and**
- **cover the period 2020 to 2040.**

Once adopted it will supersede specified strategic parts of the East Devon Local Plan, Exeter Core Strategy, Exeter Local Plan, Mid Devon Local Plan (once adopted), Teignbridge Local Plan and any other Development Plan Documents as necessary.

The preparation timetable is as follows:

- **February 2017 – Issues consultation**
- **June 2019 – consultation on draft plan**
- **September 2020 – Publication (Proposed Submission)**
- **March 2021 – Submission**
- **May 2021 – Inspector's Hearings**
- **December 2021 – Adoption"**

Revised Timetable

However, with changes in administration arising from the recent elections it has been necessary to ensure that the GESP is proceeding in a way and on a timetable which continues to meet the objectives of the four councils. Discussions between lead officers and members have therefore been taking place and the planned June 2019 consultation was put "on hold". Recently, at the first meeting of the GESP Leadership Group (see below), the councils' leaderships confirmed their commitment to continuing GESP preparation but with a revised timetable. It is necessary that the new timetable is formally inserted into the councils' Local Development Schemes.

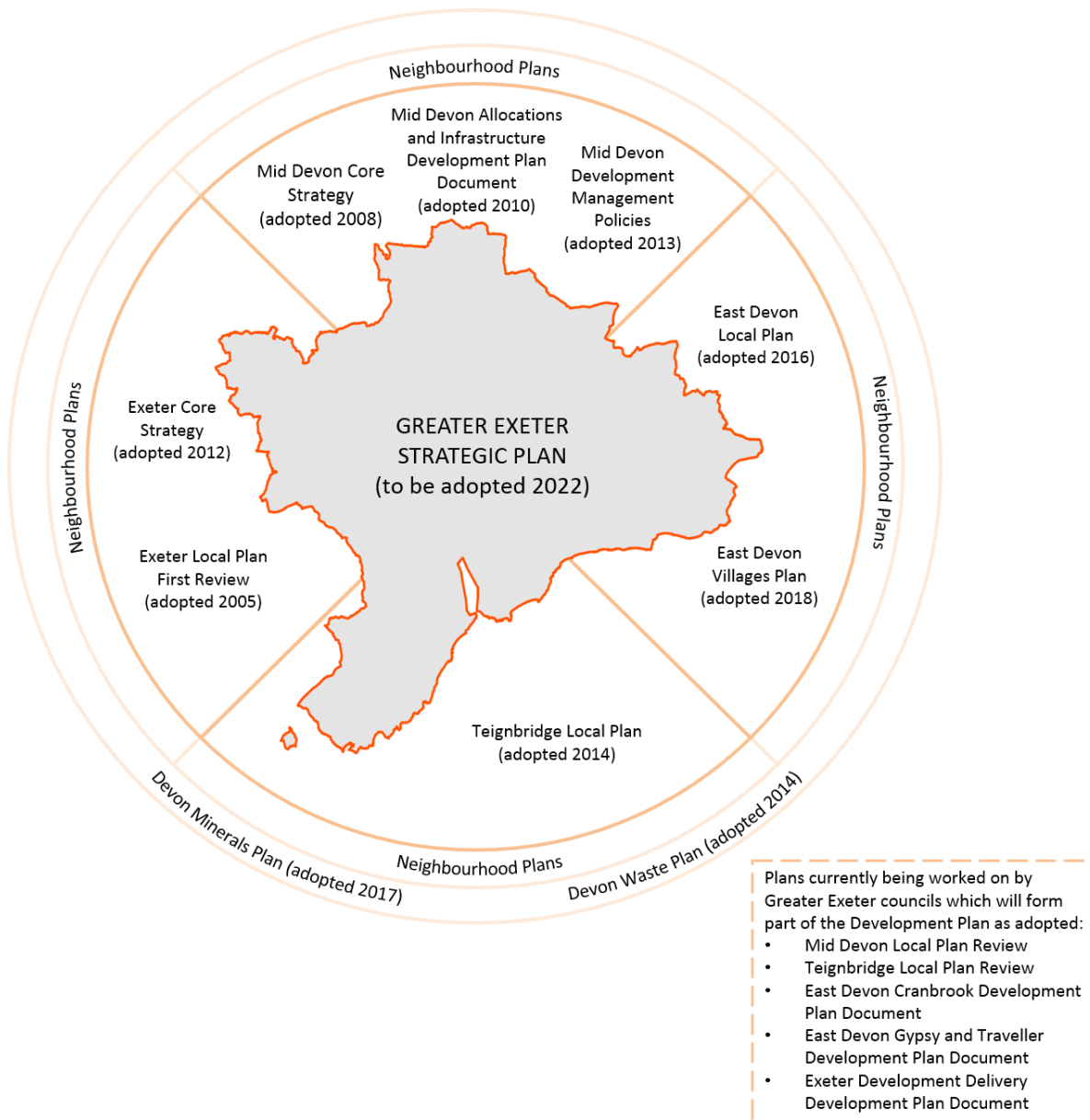
The following milestones are now proposed to replace those set out above, including an explanation of their role in the plan preparation process:

Stage	Notes	Date
Draft Policies and Site Options	A document containing the proposed strategic policies for comment, together with a number of potential strategic site options. There will be more options than will eventually be contained in the GESP, giving communities and others the opportunity to respond in the light of a wide range of alternative sites.	June 2020
Full Draft Plan	The full draft will contain revised policies, taking account of the consultation and any further work undertaken. More controversially, it will have narrowed down the strategic allocations to the final list, and seek further comments on those. The “rejected” options will no longer be within the plan.	November 2020
Proposed Submission	The form of the plan which the council wishes to submit, based on the full draft, but taking account of any comments received to the draft. This is the last formal consultation on the plan before it is submitted. Also known as the “publication” stage.	February 2022
Submit Plan	The plan and all its evidence is sent to the Planning Inspectorate and the examination process starts.	July 2022
Examine Plan	An Inspector leads an examination into the plan through a series of hearings. The focus is on whether the plan is “sound”. There may be further changes to the plan in the form of “Main Modifications” recommended by the Inspector.	September 2022
Adopt Plan	The Plan can only be adopted with a positive recommendation from the Inspector with any Main Modifications proposed by them.	April 2022

GESP Scope revisited

The Greater Exeter Strategic Plan, as its name indicates, is intended to provide an overarching strategy for the area, but not to include the full suite of policies and proposals. Each council will continue to update their own individual local plan (or plans) covering issues not include in GESP. In addition, Neighbourhood Plans will continue to be prepared by local communities. The various plans, once adopted, will be read together to provide the “Development Plan” against which planning applications are to be assessed.

The diagram at the top of the following page helps to explain the relationship between the various plans:



Issues of interpretation can arise where planning policies overlap with different wording affecting the same application. In order to avoid this it is important that the distinction between what goes in the GESP and what is expected to go into local plans, ie the scope of each plan, is sufficiently clear.

The current LDS, quoted above, describes the GESP scope in quite general terms. The Leadership Group considered the matter afresh with 3 options being presented which are summarised below with a list of their pro's and con's:

Scope 1 Strategic Allocations

- GESP would allocate Strategic sites of 500+ homes plus strategic employment sites, with comprehensive policies setting out infrastructure and planning requirements for the sites.
- Local Plans would not need to contain further policies on the Garden Communities and Strategic sites although there would be the option to do so if needed in a particular case.

Pro's

- Minimises re-working of currently produced documents as based on current scope

- Quickest way to deliver the full suite of policies for the delivery of strategic allocations and enable their delivery
- Gives greatest clarity to communities as early as possible

Con's

- Includes the most detail of the options and therefore has the greatest scope for disagreements and delays
- Could lead to a perception that detailed local level issues are being determined jointly at strategic level
- Leads to a need for early decision making about how sites are to be delivered

Scope 2 Strategic Locations

- GESP would show the location of strategic development proposals and strategic employment sites. Comprehensive infrastructure and other policy requirements for these sites would not be included.
- Therefore, the later Local Plans would include the full planning requirements for the garden communities and strategic sites.

Pro's

- Requires some stripping out of detail from the currently produced work and some reworking to align with new scope
- The lesser detail would lead to fewer areas for potential disagreement and delay
- Provides more scope for delivery options to be considered and mechanisms put in place before setting detailed requirements

Con's

- Splits the policy framework for strategic sites between the GESP and Local Plans making both documents relevant to them and a potentially confusing policy position
- Would take longer than scope 1 to provide the full suite of policies required to deliver strategic sites
- Less clarity for communities as would be consulting on proposed strategic allocations without details of how and what would be delivered.

Scope 3 New Communities only

- GESP would show the location of the largest new settlements (such as Culm Garden Village). However, comprehensive infrastructure and other policy requirements for the Garden Communities would not be included.
- Local Plans following on from GESP would therefore include the full planning requirements for the garden communities.

Pro's

- Includes the least detail and therefore the least potential for disagreement and delays
- Potentially quickest as less to consult on and potentially quicker turn around between consultations
- Provides more scope for delivery options to be considered and mechanisms put in place before setting detailed requirements

Con's

- Would require significant stripping out of details and reworking
- Would leave greatest uncertainty for communities
- Risks criticism for deferring the difficult decisions
- Increase to local plan remainder figures
- Splits the policy framework for strategic sites between the GESP and Local Plans making both documents relevant to them and a potentially confusing policy position
- Would take longer than scope 1 to provide the full suite of policies required to deliver strategic sites

The Leadership Group considered the above potential scope options with varying levels of detail and sites. Overall options 2 and 3 provide less certainty for communities and later delivery of the strategic sites. This latter issue would lead to the need to allocate additional development sites either within GESP or within the later local plans.

The Leaders Group supported an updated version, containing a clearer description based on scope 1, as follows:

The Greater Exeter Strategic Plan will cover the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge (i.e. those Councils' administrative areas excluding Dartmoor National Park). It will be prepared jointly by those four local planning authorities with the support of Devon County Council under Section 28 of the Planning and Compulsory Purchase Act. It will:

- **set an overall vision and strategy for the area in the context of national and other high level policy and in particular climate emergency declarations and the NPPF;**
- **contain policies and proposals for strategic and cross boundary issues where these are best dealt with at a larger-than-local scale;**
- **set the overall amount of growth for the period 2020 – 2040;**
- **promote the Liveable Exeter vision by allocating urban regeneration sites in the city;**
- **implement the overall vision and strategy by allocating strategic sites of 500 or more homes which may include urban extensions and new settlements ;**
- **provide districts' local plans with targets for non-strategic development**

This updated scope provides the following key benefits.

- It is legally "sound" because GESP will contain enough detail to be justified by evidence and by comparison with other potential strategy approaches, the proposals will be worked up in enough detail for their effectiveness to be tested and confirmed, and it will deal with the strategic matters facing the area rather than deferring them.
- The policies can be applied as soon as GESP is adopted, rather than waiting for a later plan to add further detail. This is highly beneficial in matters of urgent policy renewal like climate change. At the same time GESP will not be filled with policies which are better dealt with in district local plans.
- It means that communities will be aware of the detail of proposals early in the process, ensuring that they have the opportunity to comment on them with a good understanding of the plan and the potential alternatives. Once the GESP is adopted, communities will have clarity and certainty about the policies and proposals.

- The allocated strategic development sites, including the “Liveable Exeter” brownfield sites and any strategic greenfield sites could start to develop earlier. This reduces the number of other sites needed within GESP or the districts’ own local plans.

It is envisaged that the revised description and timetable detailed in Appendix 1 will be incorporated in a revised Local Development Scheme (LDS) to be reported to Strategic Planning Committee on 17th December 2019.

Governance - how will GESP decisions be made?

There have been suggestions made that the Greater Exeter Strategic Plan removes decision-making authority from the individual councils. However, this is not the case, since despite being a joint plan, the GESP must be approved by all four of the participating councils at each stage. As a result of this it is clearly important that there is a co-ordinated approach to member involvement in plan decisions if decision-making is to be effective. The governance of the plan is set out below, for information:

- **GESP Officer Team**
Working on evidence development and plan preparation and making recommendations as necessary to the other bodies and to individual councils on GESP matters. The team consists of informally seconded officers from the partner authorities, with a Team Manager. The team works out of Exeter Civic Centre and manages the joint GESP budget which has been agreed by the partner authorities.
- **Project Assurance Group:**
Provides a regular steer and decision making on detailed matters to the GESP team, including considering reports, evidence and plan drafts. Gives advice to the Principals Group. It generally meets monthly and consists of the Head of Planning or equivalent from each of the partner authorities.
- **Principals Group:**
Acts as the main officer board for the project, providing high level corporate input and direction. Considers reports, evidence and plan drafts including recommendations from the Project Assurance Group. It generally meets monthly and consists of the Chief Executives or equivalent from each of the partner authorities.
- **GESP Leadership Group:**
Primary Member Group which provides political advice and steer to the work of the GESP, oversees progress on the plan and secures political agreement and support for GESP proposals. Considers advice and recommendations from the GESP Team, Project Assurance Group, Principals Group including reports and draft plans. It will meet approximately six times per year, but this will be varied to reflect GESP workload. Consists of the Leader and Planning Portfolio Holder (or equivalent) of each of the Partner Councils. The first meeting has been held, and supported the timetable and scope as recommended by this report.
- **Member Reference Forum:**
Provides wider, informal councillor input to plan preparation through workshops, discussion and other appropriate methods. Will support the preparation of plan policies and proposals including discussion of draft plan proposals before they are formally considered by each council. It will meet as and when it is needed. Consists of 10 councillors, politically balanced, from each of the four local planning authorities (total 40 councillors). Meetings are usually also attended by members of the Principals Group, Project Assurance Group and Leadership Group. Meetings have been arranged starting in November through to March with invitations going out shortly.

- **Local Planning Authorities:**
The formal decisions on plan contents up to and including its adoption are made by the four local planning authorities through their own decision making structures. The governance bodies referred to above are intended to ensure GESP progress through these formal processes without undue delay. The councils will be considering the Draft Policies and Site Options consultation document in or around May 2020 in time for June consultation. In the case of EDDC it would be considered by Strategic Planning Committee and would need to be agreed by all partner authorities before consultation could commence. The same process would apply to further consultations and then any decision to submit the GESP for examination would need to be made by full council and then adoption would also have to be agreed by the council.

Conclusion

The preparation of the Greater Exeter Strategic Plan has been somewhat on hold while the implications of new administrations in three of the councils have been absorbed. The council leaders have now met and discussed a preferred way forward for the plan, including an updated description of the plan and a new timetable. Members are now asked to agree the scope and timetable for GESP.

Appendix A

Draft Local Development Scheme – GESP Section

The Greater Exeter Strategic Plan will cover the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge (i.e. those Councils' administrative areas excluding Dartmoor National Park). It will be prepared jointly by those four local planning authorities with the support of Devon County Council under Section 28 of the Planning and Compulsory Purchase Act. It will:

- set an overall vision and strategy for the area in the context of national and other high level policy and in particular climate emergency declarations and the NPPF;
- contain policies and proposals for strategic and cross boundary issues where these are best dealt with at a larger-than-local scale;
- set the overall amount of growth for the period 2020 – 2040;
- promote the Liveable Exeter vision by allocating urban regeneration sites in the city;
- implement the overall vision and strategy by allocating strategic sites of 500 or more homes which may include urban extensions and new settlements ;
- provide districts' local plans with targets for non-strategic development

Once adopted it will supersede specified strategic parts of the East Devon Local Plan, Exeter Core Strategy, Exeter Local Plan, Mid Devon Local Plan (once adopted), Teignbridge Local Plan Parts 1 and 2 and any other Development Plan Documents as necessary. The preparation timetable is as follows:

- Site Options and Draft Policies – June 2020
- Draft Plan – November 2020
- Publication (Proposed Submission) – February 2022
- Submission – July 2022
- Examination – September 2022
- Adoption – April 2023