

Report to: **Strategic Planning Committee**

Date of Meeting: 23 July 2020

Public Document: Yes

Exemption: None

Review date for release None



Subject: **Greater Exeter Strategic Plan (GESP): Draft policies and site options consultation**

Purpose of report: This report seeks Members support for the on-going engagement of East Devon District Council in the production of the Greater Exeter Strategic Plan through agreeing to consult on draft policies and sites options for inclusion in the plan. The report details the content of the consultation and seeks agreements for this to proceed to consultation in September. The report also identifies a need for additional funding to bolster the GESP officer team to support future work on the plan and seeks the committee's support for these proposals.

Recommendation: **It is recommended that:**

- 1. The GESP Draft Policies and Site Options consultation document attached at Appendix A is approved for public consultation;**
- 2. The GESP Draft Policies and Site Options Sustainability Appraisal Report attached at Appendix B is approved for public consultation;**
- 3. The Initial Habitat Regulations Assessment Report attached at Appendix C is approved for public consultation;**
- 4. The content and conclusion of the GESP Equality Impact Assessment Screening Report attached at Appendix E are noted;**
- 5. Delegated authority is given to the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the above documents arising from decisions by the other GESP authorities before they are published for consultation;**
- 6. A further 'call for sites' process, to be held alongside the consultation on the GESP Draft Policies and Site Options document, is approved;**
- 7. The content of the consultation statement for the 2017 Greater Exeter Strategic Plan Issues consultation attached at Appendix D is noted;**
- 8. That it being recommended to Cabinet that the GESP team is brought up to 8 full time equivalent members of staff and that local planning authority staff resources are provided equitably to the team through equalisation arrangements. For EDDC, subject to**

confirmation of the additional GESP staff roles that will be required, this is likely to equate to a total contribution of approximately £62,000 per annum towards staff costs, or an additional c.£23,025 per annum on top of existing contributions.

Reason for recommendation:

Consultation is a legal requirement of plan preparation. The first Issues consultation on the GESP was held in 2017. Subsequently there has been significant work undertaken to develop evidence, draft policies and consider site options. It is appropriate to consult on this work so that communities and stakeholders have an opportunity to provide comments and shape the development of the plan.

In order to proceed with GESP it is necessary to have adequate staff resources to undertake the required work.

Officer:

Ed Freeman – Service Lead – Planning Strategy and Development Management

Portfolio Holder:

Portfolio Holder Strategic Planning

Financial implications:

Financial implications are considered and contained within the appendices of the report.

Legal implications:

As set out in more detail within the report as a local planning authority, party to the GESP, the council is required to carry out its own consultation and take into account any representations made together with consideration of the environmental assessments and appraisals prior to submission to the Secretary of State. Sufficient resources to be able to progress the GESP are for Cabinet to approve.

Equalities impact:

Low Impact

Under the Equality Act 2010, the vision and draft policies of the GESP consultation document have been considered through a screening process which has identified that the content does not require a full equality impact assessment (see section 7 of this report).

Climate change:

High Impact

The GESP incorporates a target that carbon emissions from the Greater Exeter area are net zero by 2040 at the latest. This is ten years earlier than the national target and reflects the priority given to the climate emergency by the Greater Exeter Councils. Furthermore, the draft policy goes on to state that decisions on infrastructure investment and development applications will consider their impact on achieving this target. More widely, the draft policies contain significant requirements for new developments to be carbon neutral, together with proposals for a low carbon transport strategy which would provide a significant contribution to meeting the target. Site options have been selected in large part because of their potential to minimise carbon emissions due to location and the potential to minimise the need to travel. It should be noted that planning decisions are just one of the actions needed to proceed to a carbon neutral area and country. Individual Councils may proceed faster towards carbon neutrality in accordance with their own individual policies.

Risk:

Low Risk

The GESP is being jointly prepared by four Local Planning Authorities. This means that Committee decisions are required from the four LPAs to enable milestones such as consultations to be reached. There is a risk that one or more of the LPAs does not approve the GESP consultation or associated recommendations. However, significant steps have been taken to avoid this eventuality; Members from each of the LPAs have been involved in developing the GESP and given significant opportunities to shape the consultation documentation. It is acknowledged that revisions to the consultation material could be proposed through the Committee processes of the four LPAs. Recommendation 5 requests delegated authority for the Leader, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the consultation material so that the consultation can be held in a timely manner. This same approach will be taken for all of the four LPAs.

Links to background information:

National Planning Policy Framework – Section 3 – Plan Making: <https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making>

Planning Practice Guidance – Plan Making: <https://www.gov.uk/guidance/plan-making>

GESP website: www.gesp.org.uk

Key SPC reports on GESP:

- 12/07/16 – <https://bit.ly/2BfdCnJ>
- 17/01/17 - <https://bit.ly/3i6wE01>
- 24/04/18 - <https://bit.ly/3g7ab1l>
- 04/09/18 - <https://bit.ly/2Zh7enU>
- 20/08/19 - <https://bit.ly/383JxUc>
- 22/10/19 - <https://bit.ly/2VqHZ1v>

Draft policies & site options consultations – [Appendix A](#)

Sustainability Appraisal Report – [Appendix B](#)

Habitats Regulations Assessment & Mitigation Strategy for the Greater Exeter – [Appendix C](#)

Greater Exeter Strategic Plan – Issues Consultation: 2017 Statement of Consultation – [Appendix D](#)

Equality Impact Assessment – Screening Report – [Appendix E](#)

Future Options – [Appendix F](#)

Link to [Council Plan](#):

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

Report in full**1. Purpose**

This report seeks approval from Strategic Planning Committee to consult on the Greater Exeter Strategic Plan (GESP) draft policies and site options consultation document and associated reports, hold a further 'call for sites' to inform the plan making process and increase staff resources in the GESP team.

2. Introduction

The Greater Exeter Councils are the local planning authorities of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council, together with Devon County Council as a key infrastructure provider and the Minerals and Waste Planning Authority for the area. The Greater Exeter Councils formally agreed to prepare a statutory joint plan at various meetings during 2016 and incorporated the GESP into their Local Development Schemes accordingly. This was agreed at the Strategic Planning Committee meeting on the 12th July 2016 where the case for the GESP was made. The main points are as follows:

The Case for a Joint Plan

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.

How growth is accommodated and how this is co-ordinated between the authorities will be key moving forwards as will the 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 in every sector of the local economy
- 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 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 which was adopted in 2017 and also a plan for the Plymouth and South West Devon area which was adopted in 2019.

Joint plans are finding favour with local plan inspectors indeed 15 Local Plans have either been withdrawn or recommended for withdrawal by the Planning Inspectorate since the duty to co-operate was introduced showing how hard it has become to meet the duty with a standalone district wide local plan. 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 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.

The advantages and disadvantages of undertaking GESP to address strategic planning issues followed by a Local Plan to address non-strategic issues versus a traditional local plan approach are summarised in the table below:

Advantages
<ul style="list-style-type: none"> • GESP provides a sub-regional strategy to help frame the Local Plan
<ul style="list-style-type: none"> • Addresses duty to co-operate requirements with other Greater Exeter authorities and provides a co-ordinated approach to addressing the duty with authorities outside of Greater Exeter
<ul style="list-style-type: none"> • Joint plans are encouraged by government
<ul style="list-style-type: none"> • Greater Exeter brand has traction with government and gives greater access to funding
<ul style="list-style-type: none"> • Planning based on the functionality of the area rather than administrative boundaries makes sense
<ul style="list-style-type: none"> • Enables better co-ordination of the delivery of infrastructure (eg. Transport) and we have a louder voice in discussions with providers through GESP

<ul style="list-style-type: none"> • By addressing common issues such as the climate change emergency and habitat protection together we can achieve much more
<ul style="list-style-type: none"> • More efficient and effective with significant cost savings by jointly commissioning evidence and joint team etc.
<ul style="list-style-type: none"> • Continuing with GESP is likely to be the quickest way to develop an up to date strategy for growth in East Devon
<ul style="list-style-type: none"> • Access to greater resources, knowledge and expertise through joint working on the plan
<ul style="list-style-type: none"> • Greater opportunity to influence the growth strategy of other administrative areas within Greater Exeter
Disadvantages
<ul style="list-style-type: none"> • Perceived loss of control
<ul style="list-style-type: none"> • Lack of control over the rate of progress and risk of delay if partners cannot agree
<ul style="list-style-type: none"> • Recently some joint plans prepared elsewhere have not been found sound at examination
<ul style="list-style-type: none"> • Perceived delay to production of a new Local Plan while we wait for GESP
<ul style="list-style-type: none"> • Potential for the approach to consultation to be more locally based and tailored to our communities
<ul style="list-style-type: none"> • Increased potential for political change to occur and impact on the process
<ul style="list-style-type: none"> • Need to compromise to accommodate partners individual ideas
<ul style="list-style-type: none"> • Complexities around which policies/part of policies within the adopted Local Plan are superseded by GESP leading to a potentially complex picture until new Local Plan adopted

Members should note that aside from the above there are specific issues with disengaging from the GESP process at this stage specifically the need to disentangle the East Devon elements of the evidence base from the wider Greater Exeter assessments that have so far been carried out before a full Local Plan could be produced. There is also a significant issue in that currently only 1 member of EDDC staff is part of the GESP team and so there would need to be a process of the Local Plan team familiarising themselves in greater detail with the evidence base before a Local Plan without GESP could proceed.

The case for undertaking the GESP is considered to remain compelling and continuing with its preparation is considered to be the most appropriate way of delivering a development plan for East Devon.

The GESP will cover the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge (excluding Dartmoor National Park). It is being 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 on a wider geography;
- Set the overall amount of development for the period 2020 – 2040;
- Promote the Liveable Exeter vision by allocating urban regeneration sites in the city of more than 100 dwellings;

- Implement the overall vision and strategy by allocating strategic sites of 500 or more homes outside of the city which may include urban extensions and new settlements, together with strategic employment sites; and
- Provide district and city council local plans with targets for non-strategic development.

The GESP was subject to an early round of public consultation during February to April 2017. That 'Issues' consultation launched the concept of the GESP and explored the key issues that the plan should address. Responses to the comments provided during that consultation are set out within the GESP Issues consultation statement at Appendix D.

The adopted Local Development Schemes (LDSs) of the Greater Exeter Councils set out the formal timetable for the GESP. The LDSs identify that the next round of public consultation on the GESP - the draft policies and site options consultation - was due to have commenced in June 2020. However, the COVID-19 pandemic has necessitated deferring the start of consultation until September 2020. In the future, the Councils' LDSs will need to be updated to reflect both this change and the longer term impacts of the pandemic on the GESP timetable.

The purpose of the draft policies and site options consultation is two-fold. Firstly, to invite comments on a number of draft strategic planning policies which would apply across the Greater Exeter area. These policies are limited to those which cover issues that are better dealt with consistently across the area, rather than on a district-by-district basis in local plans. Secondly, to discuss the proposed spatial development strategy for the area and provide the first indication of the potential housing and employment site options which may form part of the GESP. The proposed consultation document contains a total of 39 site options on which comments will be sought.

3. Content of the GESP draft policies and sites consultation document

The four Greater Exeter Councils are being recommended to publish the draft policies and site options document for an 8 week period of consultation, commencing in September 2020. Because it is a joint plan, the document must be agreed by all four Councils before it is finalised.

The consultation document is divided into three main sections as follows:

- **Section A: Purpose**
This describes why the GESP is being prepared and how it relates to local plans and neighbourhood plans. This was an issue raised during the earlier Issues consultation.
- **Section B: Policies**
This section includes the draft vision for the Greater Exeter area. It has been revised to take account of comments received during the Issues consultation and work undertaken subsequently. The vision is split into three sections: 'the plan' which summarises the purpose of the GESP; 'the place' which explores the future of Greater Exeter; and finally a section on the 'priorities' for the area. The rest of Section B is divided into a series of thematic chapters which include the draft policies for the GESP and provide the associated explanatory text. The following thematic chapters are included:
 - Climate emergency;
 - Prosperity;
 - Homes;
 - Movement and communication;
 - Nature; and
 - Quality places and infrastructure.

- Section C: Spatial development strategy and site options
This final section includes the spatial element of the GESP, setting out the amount of development required, a spatial development strategy and how this could come forward through a series of potential site options. The following elements are included:
 - The number of homes;
 - Existing housing sites and the number of houses on GESP allocations;
 - The spatial development strategy and associated map;
 - Four strategic growth areas covering the central, northern, southern and eastern areas of Greater Exeter;
 - The relationship with local plans and smaller sites; and
 - A series of 39 site options for housing and employment development which fall within the strategic growth areas.

It should be noted that not all of the site options will be required for further consideration and inclusion in the next stage of the GESP.

Spatial development strategy

As set out above, an important element of the draft policies and site options consultation document is the spatial development strategy contained in Section C, from which the 39 site options have been identified. The spatial development strategy is based on the following key themes, which are themselves informed by the draft vision:

- Protecting key environmental assets;
- Recognising the impact of development distribution in terms of carbon production;
- Identifying accessible and well connected development locations;
- Seeking increased densities in our urban areas and around transport hubs;
- Connecting settlements by IT and other infrastructure, reducing the need to travel and minimising grey infrastructure requirements; and
- Ensuring growth has a clear purpose, leading to individual character.

Driven by these themes, the spatial development strategy focuses strategic development:

- On brownfield and greenfield land in Exeter and other main towns where there is an easily accessible range of jobs, services, transport facilities and the potential to enhance these factors; and
- In new or expanded settlements of scale on key transport corridors, particularly the rail corridors which extend out from Exeter, ideally where cycling is also a feasible option to access key jobs and services.

Members should note that in addition to strategic development allocations made in the GESP, local plans and neighbourhood plans will have a role to play in allocating smaller sites in accordance with locally determined priorities and needs. Such allocations will be necessary to ensure that the housing and economic development needs of the four Councils are met.

Some Members have already noted that Policy GESP 16: Housing Target and Distribution states that the Housing Delivery Test and five year housing land supply calculations would be assessed on a Greater Exeter area wide basis from the date of adoption of GESP. Members will understand the consequences of not maintaining a 5 year housing land supply position. Whether measured simply based on what is happening in East Devon or across the wider GESP area the housing land supply position is heavily dependent on the actions of developers both in terms of the build out of new homes and in them seeking consent for housing sites without which an adequate supply cannot be maintained. The control of any local authority is limited to its ability to allocate and grant consent for sites and in so doing ensure that they are viable and deliverable.

Working in partnership always requires an element of trust on both sides and so the policy anticipates that all partners will act responsibly to try and maintain a 5 year land supply position across the Greater Exeter area. Members should however note that the sensitivities of this approach are understood and the governance measures that would be put in place to oversee delivery of housing across the area are for discussion later in the development of GESP. In the meantime as with all of the proposals in the document it is simply proposed to seek views on this approach with no commitment needed by Members to the approach at this stage. It is not a requirement of a joint plan that housing delivery be jointly monitored, but as part of a co-ordinated approach to delivery this approach does make sense in planning terms.

After explaining the derivation of the spatial development strategy, the consultation document identifies four potential strategic growth areas located across the Greater Exeter area where development would fit with the strategy. These strategic growth areas - central, northern, southern and eastern - have been assessed in the GESP Sustainability Appraisal (see section 5 of this report), which concludes that they offer the most appropriate combination of economic, social and environmental benefits (or minimised negative impacts) in terms of development. The four strategic growth areas also reflect the vision of an accessible and networked city region of linked and distinct communities. The site options contained in the consultation document are all within one of these strategic growth areas. The strategic growth areas are summarised below.

Central strategic growth area

This large area includes Exeter and immediate surrounds, the “West End of East Devon” and the Tarka Line railway corridor as far as Crediton. It comprises the focal point of the Greater Exeter area’s transport connections. Much of the Central area has seen very substantial planned growth and investment. It contains the growing new town of Cranbrook, the Science and Sky Park economic hotspots (designated as an Enterprise Zone) and a number of major urban extensions to the city. It is a sustainable transport node with four railway lines, a series of stations (with additional stations planned), excellent bus and cycle provision and an emerging cycle and car club infrastructure. It is also the focus of the strategic road network, while major institutions such as the University of Exeter and the Met Office provide continued economic impetus. These conditions converge to drive significant demand for new homes and economic investment.

Within Exeter there is large brownfield regeneration potential for high quality sustainable development, as articulated in the Liveable Exeter vision for the city. The Central area also offers locations for further urban extensions and new settlements with good sustainability credentials. However, there are environmental sensitivities to consider, including the high quality historic environment and the internationally important Exe Estuary, Dawlish Warren and Pebblebed Heaths, which are potentially vulnerable to visitor pressure. High quality development, green infrastructure and habitat management will be key mitigation requirements, whilst an innovative and multi-modal transport strategy will support development. There are 26 site options within the Central strategic growth area.

North strategic growth area

Towards the northern boundary of the Greater Exeter area, about half way between Taunton and Exeter, the Northern strategic development area stretches from Tiverton to Cullompton. The existing mainline station at Tiverton Parkway combines with two motorway junctions to give excellent access and there are fewer national or international environmental sensitivities than in many other Greater Exeter locations. Proposals within the Mid Devon Local Plan Review include significant economic and housing expansion, with a new tourist and leisure hub at Junction 27 of the M5 and the initial phases of the Culm Garden Village, to the east of Cullompton. Improvements to the motorway junctions and a new railway station at Cullompton are key infrastructure requirements. There are 3 site options within the North strategic growth area.

South strategic growth area

Near the southern extent of Greater Exeter, Newton Abbot, Kingsteignton and Kingskerswell create a significant employment and housing area. This wider urban area has good transport links including the Great Western mainline railway, access to the strategic road network via the A38 and the recently completed South Devon Highway to Torbay. There is the potential to continue to develop the area's role with additional homes and employment, following on from the strategic development allocated on the edge of Newton Abbot in the existing local plan. There are sensitivities to consider in this location; Dartmoor is within proximity of the northern part of the area, there are internationally important bat habitats and considerable reserves of the nationally significant ball clay mineral. Development impact would require mitigation, with green infrastructure likely needing to play an important role. There are 4 site options within the South strategic growth area.

East strategic growth area

Within the eastern part of the Greater Exeter area, the Waterloo Line provides a mainline rail service from Exeter to London together with important local connectivity between towns and to Exeter. The corridor is also well served by the strategic road network, including the A30 which provides good links east and west. The market towns of Honiton and Axminster have economic and housing potential, while settlements with existing stations may provide the opportunity for strategic expansion accompanied by sustainable transport options. Plans to improve frequencies along the Waterloo line would enhance the sustainability of proposals in this area. A key environmental consideration in the area is the presence of Areas of Outstanding Natural Beauty which would need to be protected. There are 6 site options within the East strategic growth area.

Summary

The significant work that has been undertaken on the GESP forms a tangible further stage in the project. The draft vision, draft policies, suggested spatial development strategy and site options require consultation in order that views of the community and stakeholders can be gathered, understood and used to inform the next stage of the GESP. An engagement strategy will be produced to set out how the consultation for this stage of the GESP will be undertaken. This will be in accordance with the revised Joint SCI for the GESP, which is being brought to this Committee for approval in a separate report, and will need to respond to the current Covid-19 situation.

Recommendation 1 requests approval for consultation on the GESP draft policies and site options document.

It should be noted that each of East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council need to approve the consultation on the GESP draft policies and site options document and associated documents from September 2020. Consistent recommendations will be considered by the relevant decision-making body of each Council. During this process, there is the potential for some revisions to be identified by each Council. In order to enable such revisions to be considered through the democratic process in a timely manner, recommendation 5 requests that the Leader be given delegated authority, in consultation with the Portfolio Holder and Chief Executive, to agree changes to the consultation documents which may arise from decisions by the other GESP authorities, before they are published for consultation.

4. Evidence

In order for a local plan or a strategic plan such as the GESP to be adopted, it must first be examined by an independent planning inspector and found 'sound'. The National Planning Policy Framework (NPPF) sets out four tests of soundness. One such test is that the plan must be 'justified'. This means that it must include '...an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence' (NPPF, paragraph 35). On the basis of the need for firm evidence, a range of studies, assessments and research has been undertaken during the preparation of this consultation document.

The evidence base for the GESP is continually evolving and is made available online at www.gesp.org.uk/evidence/. The evidence base currently covers a variety of themes including housing, economic development, transport, digital connectivity, retail and environmental matters. Additional evidence will be added to the GESP website when the consultation starts and as the plan progresses. This will include the reporting of the housing and economic land availability assessment (HELAA) which considers sites put forward during a 'call for sites' process held in 2017. It is important to recognise that there is no need to have all the evidence for the plan completed at this stage and that the evidence currently compiled is sufficient for this stage of the plan.

5. Sustainability Appraisal/Strategic Environmental Assessment

One of the key evidence documents which will support the GESP as it progresses is the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA). Preparing and consulting on the SA/SEA is a legal requirement of preparing a plan.

SA and SEA are similar processes. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development while the SEA process focusses on environmental impacts. Because of the cross-over of these processes, they have been undertaken together for the GESP and are covered by the 'SA Report'.

The SA Report has been prepared to assess the GESP draft policies and site options consultation document. This is attached at Appendix B. The SA Report has been undertaken by 'LUC', an independent consultancy. It follows on from the SA scoping report which set out the way in which the Councils proposed to undertake SA and which was consulted on in 2017 alongside the GESP Issues consultation. The SA approach was subsequently refined to reflect consultation comments received and also to ensure that the assessment objectives reflect each of the topics required by the SEA regulations.

The current SA Report assesses the potential environmental, social and economic impact of the key elements of the draft policies and site options consultation document. In particular, it assesses the vision, draft policies, spatial development strategy and site options. It also assesses 'reasonable alternatives' to the draft policies and site options to ensure that the GESP is progressing with an appropriate strategy. A key feature of the assessment of reasonable alternatives is the consideration of a longer list of 78 potential residential and employment sites. These sites derive from the 2017 call for sites submissions, the associated housing and economic land availability assessment (HELAA) and a wider assessment of potential development locations from within the strategic growth areas. The site options in the main GESP consultation document are considered to be the most appropriate to take forward for further consideration.

The SA Report concludes that the GESP draft policies and site options consultation document provides a basis to ensure that the level, type and location of growth in the plan area is appropriately balanced between the need to maintain and enhance the natural and built environment, to support economic aspirations for the Greater Exeter area and improve health and social wellbeing.

Recommendation 2 seeks approval for consultation on the SA Report alongside the GESP draft policies and site options consultation document.

6. Habitats Regulations Assessment

In addition to the SA, a further key piece of evidence which will inform the preparation of the GESP is the Habitat Regulations Assessment (HRA). Undertaking this process is a legal requirement of preparing a plan to ensure that it does not adversely affect the ecological integrity of a European site. European sites include Special Protection Areas (SPAs), which are classified for their bird populations of European interest, and Special Areas of Conservation (SACs), which are designated for habitats and species of European interest. There are various European sites in the local area which could be affected by the content of the emerging GESP including the Exe Estuary SPA, Dawlish Warren SAC, the East Devon Pebblebed Heaths SPA/SAC, the South Hams SAC and the River Axe SAC.

An initial HRA report has been prepared to assess the GESP draft policies and site options consultation document. This initial HRA Report has been prepared by 'Footprint Ecology', an independent consultancy who have been involved in HRA work within the Greater Exeter area historically. The initial HRA Report is attached at Appendix C.

Producing an HRA is not a legal requirement at this stage of the plan-making process, because the content of the GESP is not yet established. However, consideration of HRA matters at this initial stage enables an early understanding of any likely impacts which the emerging GESP may have on European sites, what evidence we might need to gather to understand potential impacts on sites and what amendments to the GESP might be necessary to reduce or remove these impacts.

The initial HRA Report first includes an initial screening of the policy content and site options in the GESP consultation document for likely significant effects on the European sites. It then provides recommendations to clarify points that are related to HRA. These have been incorporated in the GESP consultation document. Following the screening, topics for the subsequent 'appropriate assessment' stage of the HRA (to be undertaken alongside later stages of the plan) are highlighted with any further evidence which will be needed as the plan progresses. A full HRA, informed by the initial HRA and consultation responses to its contents, will be prepared to support the next version of the GESP.

In summary, the initial HRA report flags the draft policies which could have an impact on European sites. These policies cover housing, economic and employment targets, the airport, gypsy and traveller accommodation and some of the transport policies. The report also identifies that the site options could have an impact on European sites when considered alone or in combination. The initial HRA will enable appropriate evidence gathering to ensure that impacts on European protected sites are minimised and appropriate mitigation is identified.

Recommendation 3 seeks approval for consultation on the initial HRA Report alongside the GESP draft policies and site options consultation document.

7. Equality impact assessment screening report

Under the Equality Act 2010, local authorities have a legal duty to eliminate discrimination and promote equality within service delivery. Local authorities are required to have 'due regard' to the need to:

- Eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- Advance equality of opportunity (remove or minimise disadvantage, meet people's needs, take account of disabilities, encourage participation in public life); and
- Foster good community relations between people (tackle prejudice and promote understanding).

The protected characteristics under the Equality Act are:

- Age;
- Disability – including physical disability, mental health;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex/Gender; and
- Sexual orientation.

In accordance with the Equality Act, the GESP consultation document has been subject to an equality impact assessment. A screening exercise has considered whether the vision and draft policies are likely to have an impact, either positive or negative, on the protected characteristics above. The purpose of this screening stage is to assess whether or not it is necessary to carry out a full equality impact assessment.

The screening report is attached at Appendix E. It concludes that the equality impacts of the vision and some of the draft policies will be positive, and that the remaining draft policies are likely to have no impact due to neutral or negligible effects on groups with the protected characteristics. Therefore the screening report concludes that a full equality impact assessment of the GESP consultation document is not required.

Recommendation 4 requests that the content and conclusion of the Equality Impact Assessment Screening Report attached at Appendix E is noted.

8. Call for sites

A call for sites invites landowners, land agents, planning consultants and the wider public to identify sites which they consider are appropriate and available for development. This evidence is vital in the plan-making process as it helps Councils to demonstrate that the sites included in a plan have a realistic prospect of coming forward. In this regard, call for sites information is critical in ensuring that a plan is 'deliverable over the plan period'. This is a central element of the 'effective' test of soundness identified in the NPPF and against which a planning inspector will ultimately consider the plan.

A call for sites was held in early 2017 alongside the GESP Issues consultation. This work has informed the site options included in the GESP consultation document. However, because circumstances regarding land availability change over time, through for example, the buying and selling of land, it is necessary to update the evidence by holding another call for sites. This will demonstrate the deliverability of the site options and potentially result in further sites being proposed. It is therefore proposed that a second Greater Exeter-wide call for sites be held concurrently with the GESP consultation in the autumn. The call would be a web-based process hosted on the GESP website, requiring basic site information and a plan to be provided. The information provided will be used as evidence for both the GESP and also the individual local plans of the four Greater Exeter Councils.

Recommendation 6 requests approval to hold a further call for sites, to be held alongside the GESP draft policies and site options consultation.

9. Issues consultation

In addition to a range of evidence, the progression of the GESP has been informed by the initial Issues consultation which was held in 2017. The issues consultation document can be found at <https://www.gesp.org.uk/consultation-phases/issues/> together with the public comments received. These comments have been considered and, where appropriate, a response provided.

A variety of matters were raised in answering the six Issues consultation questions including:

- The need to clarify the role of the GESP, local plans and neighbourhood plans;
- The relevance and importance of the “duty to cooperate”;
- The role of government policies relating to housing need;
- The need for significant community involvement in preparing the GESP;
- Health and wellbeing;
- Environmental issues;
- Transport and other infrastructure provision;
- Housing matters;
- Employment issues; and
- The development strategy and the forms of new development.

It is a requirement that a statement is produced detailing the responses received during consultation and the way in which the preparation of the GESP has been informed by such responses. This consultation statement should then be made publicly available. The consultation statement for the previous GESP Issues consultation is therefore included at Appendix D. This will be made available on the GESP website.

Recommendation 7 requests that the content of the Issues Consultation Statement is noted.

10. Councillor involvement

Member involvement has been an important part of the work undertaken to develop the GESP. To facilitate Member engagement, the four Councils set up a Member Reference Forum to discuss and consider the GESP and its evidence as it was prepared. The Forum originally comprised 5 members per authority, but this was extended to 10 members per authority in 2019 to allow for greater representation of the wider Council membership. In its first format, the Forum met five times between April 2017 and March 2019. Once reconstituted, it met a further five times between November 2019 and March 2020.

Forum Members have inputted to the general strategy to consider growth constraints and opportunities, the implications of the climate emergency, transport strategy and housing need. In the last three of the Forum meetings, Members have considered the draft policy wordings and the site options. Suggested changes by Members at these Forum meetings have been considered and taken into account in the GESP consultation document.

11. Future resourcing of the Greater Exeter Strategic Plan team

The GESP team was established in 2017 and is hosted by Exeter City Council at the Civic Centre in Exeter. It comprises planning officers from East Devon, Mid Devon and Teignbridge District Councils, Exeter City Council and Devon County Council. The team is established on an informal basis, with each officer continuing to be employed solely by their contractual employer.

From the outset, it was informally agreed by the authorities that each would contribute two officers to the team. However, due to individual authority demands this has not been consistently provided and the professional level and respective salary of individual officers provided by the different authorities varies. When established in April 2017, the GESP team included approximately 8.5 full time equivalents (FTEs). Over time this level of resource has fluctuated and as of March 2020, the

number of staff had decreased to approximately 5.2 FTEs. In addition, in March 2020, the established team leader left the project. There are a number resourcing issues which currently need resolving:

- The staff contributions to date have not been split equally between the 4 local planning authorities and remain unequal within current arrangements;
- The current staffing levels have reduced by around 40%, significantly impacting on the ability of the GESP team to deliver the plan within identified timescales;
- There is no dedicated/appointed team leader responsible for project management, staff management (even if informal), Member liaison and wider engagement for the GESP (currently the team is being led by two principal planning officers); and
- There is no planning technician resource to assist with mapping and general IT/administration support.

Financing the staff resource is a particular consideration. Currently, each staff member is paid for by their respective authority. Because the professional level of the officers varies, there are different financial implications for each authority. It has been identified that there is a need to evenly distribute the financial costs relating to overall staffing between the four Local Planning Authorities. This will have budget implications for each of the authorities.

It should be noted that the County Council sits outside of this discussion because it is not a LPA for the purposes of the GESP. The County Council does however continue to support an informal arrangement for the input of its resources and has provided consistent staff resources since the GESP team was established.

Going forward, there is a need to resolve the GESP team staffing resources in order to progress the plan. A detailed analysis of likely future staffing requirements for the GESP team has been undertaken and is provided in Appendix F. Although there will be some fluctuations in future workload, the analysis demonstrates that it is appropriate for the GESP team to increase staffing levels to 8 FTEs to steer the project forwards. There is also a need to discuss the composition of the team to consider the potential for a dedicated team leader and technician. Looking more widely, it is necessary to evenly distribute the overall staff costs between the four LPAs.

A range of staffing options have been discussed with the Leaders of the Local Planning Authorities and are summarised below.

Option 1: Maintain the status quo

This option would see the GESP team remain at 5.2 FTEs, with each team member continuing to be employed solely by their individual authority. Under this option, there would be no financial equalisation agreement and a lack of resource in the team which would affect the GESP timetable.

Option 2: Retain existing staff and identify additional resource to bring staffing levels up to 8.0 FTEs

There are 3 scenarios under this option:

2a. Identify resource from within the existing planning teams and, subject to how these staffing contributions come forward, agree financial equalisation arrangements as necessary between the four LPAs covering the full LPA resource. Officers would continue to be employed solely by their individual authority. This would require all LPAs to reprioritise current plan programmes in order to divert staff to the GESP.

2b. Recruit additional staffing resources through a competitive recruitment process. The full costs of LPA staff in the team would be apportioned equally between the four LPAs by way of a financial equalisation agreement, payable to a host authority. New officers appointed would be employed by a single host authority. This would improve the contractual management arrangements for the GESP team.

2c. A hybrid between 2a and 2b whereby additional resources are obtained through a combination of existing team members and external recruitment. All contributions, whether financial or existing officers, would be balanced equitably through a financial equalisation agreement for the four LPAs. New officers appointed would be employed by a single host authority.

Option 3: All GESP team members (excluding DCC officers) to be hosted by a single LPA

This would comprise both existing and new GESP team members who would be seconded to a host authority, with all financial contributions underpinned by an equalisation agreement. As per option 2, additional staff members would be recruited to bring staffing levels up to 8.0 FTEs.

The financial implications of options 2 and 3 are summarised in the table below, which shows that the total GESP team staffing costs for each LPA would be approximately £62,000 per annum for a team of 8 FTEs.

Options 2 and 3 – Equalisation (future only)			
	Estimated annual existing staff cost/contribution (£)	Annual equalised contribution or equivalent resource cost of the additional staff (£)	Total annual equalised staff cost/contribution (£)
Staff costs (TOTAL)	145,952	103,000	248,952
East Devon	39,213	25,750	£62,238
Exeter	28,670	25,750	£62,238
Mid Devon	44,933	25,750	£62,238
Teignbridge	33,136	25,750	£62,238

Following the analysis of staffing options, recommendation 8 requests approval to increase staffing levels in the GESP team to 8 FTEs and for the total staff resource provided by the local planning authorities to be provided equitably, supported by an equalisation arrangement.

12. Financial implications of the GESP draft policies and site options consultation and future GESP team staffing arrangements

Each of the Greater Exeter local planning authorities have currently agreed to total budget contributions of £170,000 for the preparation of the GESP. The Council budget contributions are being used mainly for evidence preparation which is necessary for the production of a sound plan. The budget also covers public engagement and therefore there is no need for further funding to be provided to cover the draft policies and site options consultation.

The budget contributions do not cover staffing. Having considered the potential future staffing arrangements for the GESP team as outlined in section 12, staff or financial contributions would be required from each local planning authority to bring the staffing levels up to 8 FTEs. Although the specific costs of this staffing would be determined in future once the composition of the team

emerges, it is likely that the total staff costs for each local planning authority will be approximately £62,000 per annum.

Looking at the wider GESP budget, additional budget contributions are not currently being sought. However, once the GESP has gone through its various consultation stages and has been submitted, an Inspector and Examination will be required and this could cost in the order of £150,000 which would require additional, equal budget contributions of around £37,500 from each of the four local planning authorities. This cost would be likely to be incurred in 2022/23. A further report to Cabinet will consider this matter further in due course.

13. Legal implications of the GESP draft policies and site options consultation

Section 19 of the Planning and Compulsory Purchase Act 2004 sets out a statutory requirement for local planning authorities to prepare development plans. These plans must identify the priorities for the development and use of land in the authority's area. This stage of the plan-making process is under "Regulation 18" of the 2012 Local Planning Regulations. The four LPAs formally agreed to prepare the GESP as a statutory joint development plan at various meetings during 2016 and the GESP is incorporated into their Local Development Schemes accordingly.

Under relevant legislation, development plans must be accompanied by a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (see section 5 of this report). These similar requirements are usually integrated into one document/process which considers the effects of the plan on the environment, people and the economy, considers reasonable alternatives, propose measures to mitigate harmful effects, and proposes monitoring measures. The SA Report is provided at Appendix B.

Legislation also requires that a plan will not adversely affect the ecological integrity of European wildlife sites. This is considered through a Habitats Regulation Assessment (HRA). The Initial HRA for this stage of the GESP plan-making process is included at Appendix C and is discussed in section 6 of this report.

Consultation on the GESP will be carried out in accordance with the Joint GESP Statement of Community Involvement, which is recommended for adoption under a separate report to this committee after being consulted on in 2017. Further details about the specific approach to consultation on the GESP draft policies and site options consultation will be included in an engagement strategy. This will specifically consider the current COVID-19 pandemic.