CABINET 3 DECEMBER 2020

REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION

FUTURE STRATEGIC PLANNING WORKING WITH EXETER CITY COUNCIL, EAST DEVON DISTRICT COUNCIL, TEIGNBRIDGE DISTRICT COUNCIL AND DEVON COUNTY COUNCIL

Cabinet Member(s): Cllr Richard Chesterton, Cabinet Member for Planning &

Economic Regeneration

Responsible Officer: Mrs Jenny Clifford, Head of Planning, Economy and

Regeneration

Reason for Report and Recommendations: To set out options for future joint strategic planning arrangements with partner authorities in the Exeter Housing Market Area and Travel to Work Area. The recommendations sought are to agree a preferred approach.

Recommendation:

That Cabinet recommends to Council to support in principle the production of a joint non-statutory plan, to include joint strategy and infrastructure matters, for the Greater Exeter area in partnership with Exeter, East Devon, Teignbridge and Devon County Councils. This will be subject to agreement of details of the scope of the plan, a timetable for its production, the resources required, and governance arrangements to be agreed at a later date.

Financial Implications: The preparation of a joint non-statutory strategy and infrastructure plan would have associated production costs. However, such costs are likely to be significantly lower than those previously agreed for the production of the Greater Exeter Strategic Plan since there will be no need for a formal examination. As a collaboration between the four councils, the funding of this joint non-statutory plan will need to be shared by the four councils with a shared funding mechanism established once the scope and timetable has been agreed. Budgetary provision exists for the preparation strategic and other plans including the new Local Plan for Mid Devon through earmarked reserves. The cost of jointly prepared technical evidence would be shared between the partner councils.

Budget and Policy Framework: The likely cost for the production of a joint non-statutory strategy and infrastructure plan will need to be agreed at a later meeting, but is anticipated to be less than would have been the case for GESP and would be met through ear marked reserves set aside to support strategic planning. The Policy Framework consists of both statutory documents that have to be adopted or approved by the Council as well as locally determined policies and strategies. Once adopted, the non-statutory plan will agree a common approach for addressing key strategic cross-boundary issues.

Legal Implications: The production of a joint non-statutory plan addressing strategy and infrastructure matters would not have any direct legal implications as it would not

form part of the adopted development plan for the District. However, it will assist in discharging the requirements of the current Duty to Cooperate over cross-boundary planning matters as the Council progresses it's next Local Plan.

Risk Assessment: If the Council approves the above recommendations then further agreement will be sought between the participating Councils on the scope and content of the joint non-statutory plan in due course. The proposed scope and content will be subject to additional risk assessment, but as a non-statutory plan, there would not be an examination process or the need to meet tests of soundness. Risks are likely to be over the joint nature of the plan now proposed, necessitating an agreed approach and content. The risks of not seeking to comprehensively address cross-boundary planning issues are considered to outweigh the risks of the recommended approach.

Equality Impact Assessment: No equalities impact at this stage. If the Council approves the above recommendations then the partner authorities will need to consider equality impacts associated with any proposals as the non-statutory plan progresses. The next local plan review will be accompanied by a full Equality Impact Assessment.

Relationship to Corporate Plan: A joint non-statutory strategy and infrastructure plan will establish a common approach for responding to key cross-boundary issues. It will therefore help deliver corporate plan priorities.

Impact on Climate Change: The preparation of joint plans is a key method for climate change mitigation and environmental protection, through appropriate policies and development strategy. Commitment to joint planning will give an opportunity to consider climate and strategic environmental matters at a more effective larger-than-local scale.

Involvement in joint strategic planning provides an opportunity to consider carbon emission and climate change impacts of development and transport over a wider area. Because of this, involvement in joint planning 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 strategy chosen, however, these implications will be addressed as joint plan-making is progressed.

1.0 Introduction

1.1 The purpose of this report is to present options for alternative joint strategic planning approaches. The report recommends that joint strategic planning should continue in the form of a non-statutory joint plan prepared by the four authorities of East Devon, Exeter, Mid Devon and Teignbridge Councils, in partnership with Devon County Council.

2.0 Background

2.1 On 22nd February 2017, Full Council resolved to prepare a strategic plan (GESP) covering the Exeter Housing Market Area and travel to work area in partnership with East Devon, Exeter and Teignbridge Councils with the support of Devon County Council. Since this time, the partner authorities have worked collectively to produce evidence for the plan and prepared a Draft Plan which

was brought to the relevant committees of each authority in the summer of 2020 to seek approval for consultation.

- 2.2 At the meeting of Council on 26th August 2020, Mid Devon District Council resolved to:
 - 1. Commit to prepare a revised joint strategic plan;
 - 2. Should Officers subsequently advise that 1. proves not to be the most appropriate option in planning terms, consider a review of other options for further strategic and cross-boundary planning matters with willing participatory authorities in the Exeter Housing Market Area;
 - 3. Instruct officers to review and incorporate relevant elements of the GESP Draft Policies and Site Options consultation document and other supporting documentation and evidence that remain valid;
 - 4. Jointly prepare necessary technical studies and evidence for the new strategic plan, including conducting a further call for sites process?, align monitoring and share resources where there are planning and cost benefits for doing so;
 - 5. Reaffirm the Council's commitment to the delivery of high quality development, a Culm Garden Village as part of the Garden Communities Programme and continue to work collaboratively as a group of Councils in the garden communities programme with Homes England;
 - 6. Task Officers to prepare a further report on staff resources to prepare a revised joint strategic plan with resources to be provided equitably to the team through equalisation arrangements; and
 - 7. Task Officers to bring forward the preparation of the next Local Plan Review.

On the 23rd July, East Devon District Council's Strategic Planning Committee resolved to recommend to their Council that EDDC withdraw from working on the GESP while making a commitment to continue to work with the partner authorities. This recommendation was then agreed at their Council on 29th August.

2.3 Since that time discussions have continued between Leaders and relevant portfolio holders/executive members on alternative options for continuing partnership working outside of GESP. Discussions have focussed on the common issues that bring the partner authorities of East Devon, Exeter, Mid Devon and Teignbridge together, in conjunction with the County Council which previously fulfilled a supporting role. These common issues are primarily that the area is a single housing and functional economic area which also operates as a large travel to work area. The wider area also faces common issues; housing affordability and the need to deliver greater numbers of homes; constraints on infrastructure and limits to the availability of funding; the need for a flexible and efficient transport system which supports prosperity and access to services; the need to respond to the climate emergency, achieve net zero

carbon development and increase habitat creation; and the need to improve accessibility for urban and rural areas by widening digital connectivity. These vital issues affect the whole area and therefore can be effectively considered in a strategic, cross-boundary manner.

3.0 Benefits of continued joint strategic planning

- 3.1 While there are real-life, practical reasons for collaboration, the need to work together effectively is currently supported by the Duty to Cooperate, a legal duty in plan preparation. Although the Planning White Paper is considering the abolition of the Duty, this is some time from being removed in practice. The White Paper is also clear in identifying the on-going need to cooperate on significant matters such as infrastructure provision and central government has confirmed it is giving this further thought.
- 3.2 Turning to delivery, discussions with Homes England have shown the importance of demonstrating common aspirations, priorities and approaches to current issues when seeking funding. Joint working will be vital to help lever in this funding to support delivery, particularly regarding critical, strategic infrastructure with wide-spread benefits and where there is a large funding gap. Such an approach would help to establish a recognisable brand reflecting a tangible and clear location which would be received favourably by the Government.
- 3.3 In practical, plan-making terms, there are also significant benefits in working together because collaboration enables evidence to be commissioned jointly, expertise to be shared and effort focussed flexibly. It also provides the opportunity to seek funding or work jointly with agencies such as Homes England on plan-preparation (e.g. by sharing evidence) which could have financial and consistency benefits.

4.0 Options

- 4.1 The Project Assurance Group (comprised of the Heads of Planning from the partner authorities) have identified six options for future joint working. A summary of these is provided in Table 1. The options range from continuing to prepare a joint statutory plan, to the bare minimum requirement of meeting our Duty to Cooperate obligations whilst preparing individual Local Plans. A detailed appraisal of these options is provided in **Appendix 1**.
- 4.2 Although in purely technical planning terms the options which include statutory joint plans and strategies would be preferred, it is considered that these are unlikely to be politically acceptable for all authorities in the current period post-GESP and taking forward such a plan without all of the partners from the subregion would undermine the status of a statutory document and risk the soundness of the plan. This means that options 5 and 6 in Table 1 are unlikely to be deliverable.
- 4.3 It is considered that there is a clear need for joint working if we are to successfully address the shared issues the partner authorities face and lever in the infrastructure funding needed. Therefore undertaking a more co-ordinated

approach than simply complying with the Duty to Co-operate is considered essential. On this basis, option 1 would not be sufficient to meet the collective Councils' objectives.

- 4.4 As such, in order to effectively address the strategic cross-boundary issues set out in 2.3, to demonstrate proactive joint working on strategic infrastructure delivery, and to have a solution which is likely to be politically acceptable to all partners, it is necessary to explore a middle ground scenario. In this case, the middle ground is the preparation of a non-statutory strategy which would ensure that there is a shared approach to strategic matters such as economic development, carbon reduction, digital connectivity, infrastructure delivery and habitats mitigation whilst enabling the individual local planning authorities to retain control over the timetable and scope of statutory Local Plans. Option 4 provides the best scenario for achieving this.
- 4.5 The following options have been considered. A full appraisal is available in **Appendix 1.**

Option	Scope	Comments
1. Baseline: Each LPA progresses its own Local Plan and works with the other LPAs to meet Duty to Co-operate (or replacement)	Determined by each LPA (*). Could include some joint evidence on defined topics as has happened in the past (e.g. housing, gypsy and travellers, habitat mitigation, transport)	Minimum opportunity to agree a positive planning framework for critical issues and to lever in central government funding. Maximum opportunity to prepare an unencumbered Local Plan review.
2. Each LPA progresses its own Local Plan and works to meet the DtC. Local Plans include model strategic policies (*) and are informed by shared evidence where appropriate.	Similar to option 1, but with model policies that can be adapted to suit local circumstances and limited in scope to cross-boundary matters (e.g. climate change) (*).	Some opportunity to have a shared approach towards common issues but unlikely to sufficiently demonstrate a collective approach to attract central government support for infrastructure delivery.
3. Non-statutory Joint	Government-facing document aimed at securing funding to deliver	Would provide a co- ordinated planned response to the area's infrastructure priorities

Infrastructure Plan	infrastructure needed to support growth.	and help to secure central government investment. However, without an
	This could just be growth	overarching strategy to
	identified in adopted Local	hang the plan on, it could
	Plans and/or growth	lack ambition and a
	proposed in emerging	shared understanding of
	plans.	strategic issues.
	As a non-statutory plan it	As a non-statutory plan it
	would not be subject to	would not be subject to
	statutory consultation or	statutory consultation or
	examination and therefore	examination and therefore
	would be a faster and	would be faster to prepare
	more flexible plan.	and more able to respond
		to changing
		circumstances.
4.	Place-making, aspirational	Would provide a co-
Non-	non-statutory plan covering	ordinated response to the
statutory	strategic place making and	area's strategic economic,
joint strategy	infrastructure delivery.	climate, housing,
and		environmental and
infrastructure	Used to promote the	infrastructure issues and
plan	Garden Communities and	help to secure central
	sub-regional brand, in	government investment.
	addition to identifying	As a non statutant plan it
	infrastructure	As a non-statutory plan it
	requirements.	would not be subject to
	Part Government- facing	statutory consultation or examination and therefore
	document and part	would be faster to prepare
	strategy document.	and more able to respond
	Strategy document.	to changing
		circumstances.
5.	High-level statutory plan	Would provide a co-
Statutory joint	containing strategic	ordinated response to the
strategy and	policies and infrastructure	area's strategic economic,
infrastructure	requirements. This would	climate, housing,
plan	essentially be the	environmental and
•	equivalent to GESP, but	infrastructure issues and
	without East Devon.	help to secure central
		government investment,
	Matters/sites not covered	with added weight
	in the strategic plan will be	because it would be in a
	covered in Local Plans.	statutory plan.
		Civan recent desiries
		Given recent decisions
		made by East Devon District Council it is
		unlikely that this option will
		be politically acceptable.
		are pointedaily accoptable.

Full statutory joint plan strategic and local policies, infrastructure requirements and all site allocations. There would be no Local Plans prepared by individual LPAs.	Would provide a co- ordinated response to the area's strategic economic, climate, housing, environmental and infrastructure issues and help to secure central government investment, with added weight because it would be in a statutory plan. Given recent decisions made by East Devon District Council it is unlikely that this option will be politically acceptable. Perceived loss of local control over more locally relevant policies.

(*) Comments are caveated by the Government's proposals in the recent Planning White Paper.

Table 1: Options for Joint Strategic Plan Making

5.0 Resourcing future joint planning

- 5.1 At this stage, this report seeks an 'in principle' agreement to proceed with a non-statutory infrastructure and strategy plan based on option 4 in Table 1 with details relating to budget, detailed scope, and governance reserved for discussion at a later date. However, it should be noted that any resource required for option 4 will be less than was previously committed for GESP. This is due to the fact that a non-statutory plan:
 - Would not be subject to statutory consultation arrangements or a public examination. Costs for the examination would have been in the region of £150,000 to be split across the 4 authorities and is not currently within the GESP budget;
 - Would not include details relating to development sites which would have required extensive site investigation work and masterplanning (NB. it should be noted however that this work will have to be picked up as part of the Local Plans of each Council);
 - Can draw on the significant amount of evidence already collected as part of the GESP project. Additional evidence may be required to support the non-statutory plan but would not be above and beyond what would have been required for the GESP;
 - Is likely to require less staffing resource than the preparation of a statutory plan.

6.0 Views of the Planning Policy Advisory Group

- 6.1 The Planning Policy Advisory Group was consulted at its meeting on 18th November 2020. The following matters were raised by Members: the reference to 'Greater Exeter' and whether this description is appropriate going forward; the scope of the objectives and content of the strategy; the timetable for production and relationship with the production of a new local plan for Mid Devon; the need for meaningful public engagement.
- 6.2 The Planning Policy Advisory Group supported the recommendations of this report.

7.0 Conclusion and proposed future joint strategic planning approach

- 7.1 Having considered the various merits and risks associated with each of the options, it is recommended that a non-statutory joint strategy and infrastructure plan is prepared alongside a Local Plan for Mid Devon, in order to address the vital issues that affect the whole of the sub-region.
- 7.2 Each of the partner authorities will be taking a similar report through their relevant committees in the next few months to seek agreement on this revised joint planning approach.

Contact for more Information:

Arron Beecham, Forward Planning Officer abeecham@middevon.gov.uk / 07815 803758

Tristan Peat, Forward Planning Team Leader tpeat@middevon.gov.uk / 07967 179669

Jenny Clifford, Head of Planning, Economy and Regeneration jclifford@middevon.gov.uk

Circulation of the Report: Cabinet Member seen and approved [yes/no – name of Cabinet Member], Cabinet, Leadership Team seen and approved [yes/no]

List of Background Papers:

Appendix 1: Joint Planning Options Appraisal Matrix

Appendix 1 Joint planning options appraisal matrix

Option	Scope	Timetable	Resources	Pros	Cons	Comments
1. Baseline: Each LPA progresses its own Local Plan and works with the other LPAs to meet Duty to Co-operate (or replacement)	Determined by each LPA (*). Could include some joint evidence on defined topics as has happened in the past (e.g. housing, gypsy and travellers, habitat mitigation, transport)	Determined by each LPA (*).	Determined by each LPA. No sharing of resources (although could allow for procurement of shared evidence where considered appropriate).	Greater political certainty than joint-working options. No need for joint Governance. LPA only needs to fund a Local Plans team. Timescale fully under control of the LPA and can reflect how far it has progressed to date. LPA only has to resource 1 Examination (Local Plan). Most likely the quickest route to achieving an adopted Plan for each LPA for the purpose of meeting housing needs, securing a 5 year supply of deliverable housing sites, and having up to date policies on key matters such as climate	No opportunity to agree a positive planning framework for cross-boundary planning matters, e.g. climate change, biodiversity net gain, digital connectivity and transport (*). Reliant on DtC to address strategic cross boundary issues (*). The option least likely to attract Gov't /Homes England support for housebuilding / infrastructure delivery. Minimum opportunity to attract external funding for studies / evidence base required to support the Local Plan. Procurement of evidence by individual LPAs likely to be less efficient	Minimal joint working, including no joint strategic planning (although possibility to implement alongside options 3 and 4). Therefore the implications of taking a strategic boundary blind approach towards meeting housing needs would not be felt. Also, no opportunity to 'spread' any potential housing need asks made by neighbouring

Option	Scope	Timetable	Resources	Pros	Cons	Comments
				change, carbon reduction etc.		authorities (e.g. Torbay).
Each LPA progresses its own Local Plan and works to meet the DtC. Local Plans include model strategic policies (*) and are informed by shared evidence where appropriate.	Similar to option 1, but with model policies that can be adapted to suit local circumstances and limited in scope to cross-boundary matters (e.g. climate change) (*).	Similar to option 1, but will require an element of common Local Plan timescales across the LPAs, with agreement on model policies to meet those timescales (*).	Determined by each LPA. No sharing of resources (although could allow for procurement of shared evidence where considered appropriate). Model policies will require some form of joint working.	Opportunity to agree a positive framework for cross-boundary matters like climate change, biodiversity net gain, digital connectivity and transport. Could therefore satisfy many DtC requirements (*). Model wording would not be binding on any LPA. Greater political certainty than other joint-working options. No need for joint Governance. LPA only needs to fund a Local Plans team. LPA only needs to resource one Examination (Local Plan). Compared to option 1, provides greater scope for attracting external funding for studies /	Reliant on DtC to address strategic cross boundary issues (*). Potential for the model policies to be diluted and amended away from the common elements. Questionable if this will demonstrate a collective approach sufficient to attract Gov't /Homes England support for housebuilding / infrastructure delivery. Timescale less under the control of the LPA than option 1 and may not reflect how far it has progressed to date in its Local Plan review.	No comprehensive joint strategic planning (although possibility to implement alongside options 3 and 4). The implications of taking a strategic boundary blind approach towards meeting housing needs would not be felt. Also, no opportunity to 'spread' any potential housing need asks made by neighbouring authorities (e.g. Torbay).

Option	Scope	Timetable	Resources	Pros	Cons	Comments
				evidence base required to support the Local Plan.		
				Potential for procuring shared evidence, which may result in efficiency savings.		
				Model policies on key matters may result in less developer confusion (*).		
				Model policies / S106 requirements may reduce opportunity for developers to 'take advantage' of individual LPAs (*).		
3. Non-statutory Joint Infrastructure Plan (all 4 LPAs)	Government- facing document aimed at securing funding to deliver	Could be undertaken outside of formal Local Plan timetables if only	Determined by each LPA, although will require some form of joint working. Would need specific	Fewer joint governance pressures than options 4-6. Provides a co-ordinated planned response to the area's infrastructure	Still reliant on DTC to address some strategic cross boundary issues (*). If LPAs want the joint plan to cover growth	A non-statutory document, therefore fundamentally different to GESP.
	infrastructure needed to support growth.	covering growth in adopted	DCC involvement.	aspirations and constraints.	proposed in emerging plans, the timescale will rely on individual Local	Can work alongside options 1 or 2.
	This could just be growth identified in adopted Local	Local Plans. Could be prepared more quickly than a	Potential to be led by DCC.	Confirms common aspirations for proactive infrastructure delivery linked to development proposal without the	Plan timescales. These may vary across LPAs. Potential difficulties of preparing a joint	

Option	Scope	Timetable	Resources	Pros	Cons	Comments
	Plans and/or,	statutory		difficulties of joint plan	infrastructure plan	
	growth	plan.		making.	without a cogent joint	
	proposed in				strategy to hang it on.	
	emerging			Could be successful in		
	plans.			securing Gov't / Homes	An infrastructure plan	
				England funding for	that only sets out	
	Could cover all			infrastructure (e.g. the	infrastructure funding	
	strategic			Kent and Medway	requirements for	
	infrastructure,			Growth and Infrastructure	'already planned' growth	
	or just DCC			Framework ¹ .	may not demonstrate a	
	infrastructure.				collective and ambitious	
	Could be			Opportunity for a Devon-	approach sufficient to	
	prepared by			wide Infrastructure Plan	attract Gov't /Homes	
	DCC, although			with sub-sections	England support for	
	would need a			focussing on different	housebuilding /	
	level of buy-in			areas of Devon to avoid	infrastructure delivery	
	from the LPAs			'watering down' the sub-	unless some form	
	in order to			regional branding.	prioritisation is	
	secure external				undertake which could	
	funding.			Budget support from	be challenging.	
	Geographic			LPAs would be		
	scope would			significantly less than	An Infrastructure Plan	
	need			existing GESP budget	that sets out	
	consideration if			requirements.	infrastructure funding	
	prepared by			Although oballansins this	requirements for	
	DCC.			Although challenging, this	planned and emerging	
	May pood on			provides an opportunity for some form of	growth will require a	
	May need an associated				greater degree of joint	
				infrastructure	governance.	
	governance			prioritisation which		
	regime			improves the		

¹ Latest Kent and Medway Framework can be viewed here: https://www.kent.gov.uk/ data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf.

Option	Scope	Timetable	Resources	Pros	Cons	Comments
	covering funding prioritisation.			deliverability of key projects.		
Non-statutory joint strategy and infrastructure plan	Place-making, aspirational non-statutory plan covering strategic growth and infrastructure. Used to promote the Garden Communities and subregional brand, in addition to identifying infrastructure requirements. Part Government-facing document and part strategy document.	Prepared alongside Local Plan preparation. The strategy elements would be likely to increase the time required to deliver the project when compared with option 3.	Small project team of officers from the LPAs / DCC required.	Allows for more effective strategic and infrastructure planning and would be more likely to attract Gov't / Homes England funding than options 2 and 3. Provides a co-ordinated planned response to the area's strategic growth and infrastructure aspirations and constraints (more so than 2 and 3). Opportunity to agree a positive framework for cross-boundary matters like climate change, biodiversity net gain, digital connectivity, transport and development needs. Could therefore satisfy a number of DtC requirements (more so than 2/3) (*)	Will require Local Plans to be adopted before aspirations in the plan can be enforced. Relies on decision-making across multiple Councils for key strategic matters. Therefore potentially more politically risky than options 2 and 3). Risks diverting resources away from statutory plan preparation. Non-binding on each Council and at risk of not being followed.	A non-statutory document, therefore fundamentally different, to GESP. Can work alongside option options 1 and 2.

Option	Scope	Timetable	Resources	Pros	Cons	Comments
				Will identify and help to prioritise common infrastructure requirements		
				Budget support likely to be less than existing GESP budget support.		
				Can be prepared alongside Local Plans.		
				Can be used to promote the Garden Cities.		
				Potential for procuring shared evidence, which would result in efficiency savings.		
				DCC likely to be able to continue supporting the plan's preparation.		
5.	High-level	Will need to	Will require a	Allows for more effective	Unlikely to be politically	Same status as
04-4-4	statutory plan	be adopted	dedicated team	strategic and	viable at the present	GESP.
Statutory joint	containing	in advance	of officers from	infrastructure planning	stage, given EDDC's	However, scope
strategy and	strategic	of Local	the LPAs /	and is more likely to attract Gov't / Homes	Council decision.	may differ due
infrastructure plan	policies and infrastructure	Plans.	DCC. It is likely that additional	England funding than	This option is most	to the potential omission of site
μαπ	requirements.	Timetable	LPA resource	options 2/3/4.	inconsistent with the	allocations.
	requirements.	would need	will be needed,	Provides a co-ordinated	White Paper proposals.	anocanons.
	From the	to be jointly	as set out in the	planned response to the	E.g. two-tier planning	
	outset, LPAs	agreed.	GESP Options	area's strategic growth	may be inconsistent with	

Option	Scope	Timetable	Resources	Pros	Cons	Comments
	will need to agree: - If the plan will include strategic site allocations or growth areas; - If the housing requirement will be planned for on a boundary-blind basis; - If a joint 5YLS? will operate*. Matters/sites not covered in the strategic plan will be covered in Local Plans.		Consultation Committee paper.	and infrastructure aspirations and constraints (more so than 2/3/4). Opportunity to agree a positive framework for cross-boundary matters like climate change, biodiversity net gain, digital connectivity, transport and development requirements. Could therefore satisfy many DtC requirements (more so than 2/3/4) (*) Will identify and help to prioritise common infrastructure requirements Budget support likely to be equal to or less than existing GESP budget support. Can be used to promote the Garden Cities. Would require some shared evidence, which	zoning proposals. It therefore presents the greatest risk of abortive work. Relies on decision-making across multiple Councils for key strategic matters across all four LPAs. If the plan did not allocate sites it may be of limited value as a statutory document Any timetable delays will potentially affect the timetables of Local Plans. Will require the preparation of another Regulation 18 plan, which is likely to involve at least another 6 months. Greater budgetary requirements for the LPAs than options 2, 3, and 4.	Opportunity to introduce district housing targets to help overcome political concerns over boundary blind approach.

6. A statu contain strateg joint plan (all 4 LPAs) local poinfrastr require and all allocati			would result in efficiency savings. DCC likely to be able to		
LPAs v to agre - If tr hou req will plai on bou blin	gic and policies, ructure ements I site would need to be jointly agreed. the policies, ructure ements I be enned for a undary-nd basis; a joint	existing Local Plans teams, ideally also with resource input from DCC.	continue supporting the plan's preparation. It is technically achievable – e.g. Plymouth and South West Devon Joint Local Plan and North Devon and Torridge Local Plan. Potential for significant skills / resource sharing benefits, through the pooling of existing staff. Of all the options, this will provide the most coordinated and comprehensive planned response to the area's strategic growth and infrastructure aspirations and constraints. This option will	Unlikely to be politically viable at the present stage, given EDDC's Council decision. Relies on decision-making across multiple Councils for key strategic matters across all four LPAs. Potential for perceived loss of individual LPA control. Potential for abortive work, as may find that the plan boundaries don't coincide with possible future unitary boundaries.	Same statutory status as, but significantly greater scope than, GESP. Opportunity to introduce district housing targets to help overcome political concerns over boundary blind approach. Potential to consider single plan without the need for district local plans, particularly if the
	LS ?will erate.		demonstrate to Gov't / Homes England the greatest level of ambition and collaboration on planning matter. It's		Government reforms establish a national set of development

Option	Scope	Timetable	Resources	Pros	Cons	Comments
				therefore most likely to attract funding and support for delivery.		management policies.
				This presents the greatest opportunity to deliver a positive framework for cross-boundary matters like climate change, biodiversity net gain, digital connectivity, transport and development requirements. It will satisfy all DtC requirements within the sub-region (*).		
				Will identify and help to prioritise common infrastructure requirements.		
				Can be used to promote the Garden Cities.		
				Requires procuring shared evidence, which would result in efficiency savings.		

Option	Scope	Timetable	Resources	Pros	Cons	Comments
				Isn't contrary to Government thinking in White Paper.		