

TEIGNBRIDGE DISTRICT COUNCIL

EXECUTIVE

03 NOVEMBER 2020

Report Title	Future strategic planning working with Exeter City Council, East Devon District Council, Mid Devon District Council and Devon County Council
Purpose of Report	To set out options for future joint strategic planning arrangements with East Devon, Exeter and Mid Devon Councils and agree a preferred approach.
Recommendation(s)	The Committee RESOLVES to: <ol style="list-style-type: none">1. Recommend that Full Council formally withdraws from the preparation of the Greater Exeter Strategic Plan.2. Recommend that Full Council support in principle the production of a joint non-statutory plan, to include joint strategy and infrastructure matters, with East Devon, Exeter and Mid-Devon Councils, and in partnership with Devon County Council. 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	These are as set out at paragraph 2.1.1 Martin Flitcroft Chief Finance Officer Tel: 01626 215246 Email: martin.flitcroft@teignbridge.gov.uk
Legal Implications	These are as set out at paragraph 2.2.1 Paul Woodhead, Legal Services Team Leader and Deputy Monitoring Officer Tel: 01626 215139 Email: paul.woodhead@teignbridge.gov.uk
Risk Assessment	These are as set out at paragraph 2.3.1 Michelle Luscombe Principal Planning Policy Officer Tel: 01626 215754 Email: michelle.luscombe@teignbridge.gov.uk
Environmental/ Climate Change Implications	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. William Elliott Tel: 01626 215754 Email: william.elliott@teignbridge.gov.uk
Report Author	Michelle Luscombe Principal Planning Policy Officer Tel: 01626 215706 Email: michelle.luscombe@teignbridge.gov.uk
Executive Member	Executive Member for Planning (Gary Taylor)
Appendices	1. Joint Strategic Planning Options Appraisal
Part I or II	Part 1
Background Papers	None

1. PURPOSE

- 1.1 The purpose of this report is to seek formal agreement on withdrawal from the Greater Exeter Strategic Plan (GESP) project and 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. REPORT DETAIL

2.1. Financial

- 2.1.1. Since the start of the Greater Exeter Strategic Plan project, each Local Planning Authority has contributed £170,000 towards shared evidence
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and plan making costs. There are no commitments to make any further contributions to the GESP budget. There are unspent funds in the budget in the region of £500,000, some of which will need to be retained for future joint plan making purposes whilst the remainder can be returned to the partner authorities. This will be looked at further following a decision on this 'in principle' proposal to proceed with a non-statutory plan.

2.2. Legal

2.2.1. Section 19 (1B) of the Planning and Compulsory Purchase Act 2004 places a statutory duty on each Council to prepare a plan which identifies their strategic priorities and policies for managing the development of land in their area. The Council is in the process of preparing a review of its Local Plan. It had previously been agreed that the Greater Exeter Strategic Plan would be prepared alongside the Council's Local Plan to cover all strategic policies and site allocations. However, there is no statutory requirement to prepare a joint strategic plan and, in the absence of this, the Local Plan will absorb all strategic matters alongside local issues.

2.3. Risks

2.3.1. The main risks associated with the recommendations relate to the potential loss of ability to attract Government support and investment as a result of not having the Greater Exeter Strategic Plan 'brand' and agreed partnership aspirations. A joint statutory plan would provide most opportunity to present our plan as a nationally significant proposition to Government.

2.3.2. Without any joint plan, there would be significantly less opportunity to agree a positive framework for matters like climate change, biodiversity net gain, connectivity and transport.

2.3.3. However, a joint non-statutory plan would enable us to coordinate a response to wider area aspirations and constraints, particularly in relation to transport, infrastructure and the environment. It would demonstrate a

joined approach for addressing cross boundary and strategic issues and therefore provide a platform on which to bid for Government financial support.

2.4. Environmental/Climate Change Impact

2.4.1. Climate change mitigation and adaptation forms a key part of joint planning work. 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 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.

2.5. Background

2.5.1. On 26th September 2016, Full Council resolved to prepare a strategic plan (GESP) covering the wider area in partnership with East Devon, Mid Devon and Exeter Councils with the support of Devon County Council. Since this time, the four 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.

2.5.2. At the Executive meeting of Teignbridge District Council on 21st July 2020, it was resolved to publish the GESP Draft Plan for consultation. However, 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 the 29th August.

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2.5.3. 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 focused on the issues that bring the partner authorities of East Devon, Exeter, Mid Devon and Teignbridge together. These are primarily that the collective authorities comprise a functional economic area and form an extensive housing and travel to work area. The wider area also faces common issues; housing affordability and the need to deliver greater numbers of homes; constraints on our 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.

2.6. Benefits of continued joint strategic planning

2.6.1. 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.

2.6.2. 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.

2.6.3. 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 focused 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.

3. OPTIONS

3.1. Consideration of options for future joint planning

3.1.1. The GESP Project Assurance Group (comprised of the Heads of Planning from the participating authorities) have identified 6 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 in the form of the GESP, 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.

3.1.2. 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 sub-region 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.

3.1.3. 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.

3.1.4. As such, in order to effectively address the strategic cross boundary issues set out in 2.5.3, to demonstrate proactive joint working on strategic infrastructure delivery, and to have a solution which is 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.

3.1.5. The following options have been considered. A full appraisal is available in Appendix 1.

Option	Scope	Comments
<p>1. Baseline: Each LPA progresses its own Local Plan and works with the other LPAs to meet Duty to Co-operate (or replacement)</p>	<p>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)</p>	<p>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.</p>
<p>2. Each LPA progresses its own Local Plan and works to meet the DtC. Local Plans include model strategic policies (*) and are</p>	<p>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) (*).</p>	<p>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.</p>

<p>informed by shared evidence where appropriate.</p>		
<p>3. Non-statutory Joint Infrastructure Plan</p>	<p>Government-facing document aimed at securing funding to deliver infrastructure needed to support growth.</p> <p>This could just be growth identified in adopted Local Plans and/or growth proposed in emerging plans.</p> <p>As a non-statutory plan it would not be subject to statutory consultation or examination and therefore would be a faster and more flexible plan.</p>	<p>Would provide a co-ordinated planned response to the area's infrastructure priorities and help to secure central government investment. However, without an overarching strategy to hang the plan on, it could lack ambition and a shared understanding of strategic issues.</p> <p>As a non-statutory plan it would not be subject to statutory consultation or examination and therefore would be faster to prepare and more able to respond to changing circumstances.</p>
<p>4. Non-statutory joint strategy and infrastructure plan</p>	<p>Place-making, aspirational non-statutory plan covering strategic place making and infrastructure delivery.</p> <p>Used to promote the Garden Communities and sub-regional brand, in addition to identifying infrastructure requirements.</p> <p>Part Government-facing document and part strategy document.</p>	<p>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.</p> <p>As a non-statutory plan it would not be subject to statutory consultation or examination and therefore would be faster to prepare and more able to respond to changing circumstances.</p>
<p>5. Statutory joint strategy and infrastructure plan</p>	<p>High-level statutory plan containing strategic policies and infrastructure requirements. This would essentially be GESP without East Devon.</p> <p>Matters/sites not covered in the strategic plan will be covered in Local Plans.</p>	<p>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.</p> <p>Given recent decisions made by East Devon District Council it is</p>

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		unlikely that this option will be politically acceptable.
6. Full statutory joint plan	A statutory plan containing 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

3.2. Resourcing future joint planning

3.2.1. At this stage, we are seeking 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 £150k 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 Plan);

- 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.

4. CONCLUSION

4.1. Proposed future joint strategic planning approach

4.1.1. Having considered the various merits and risks associated with each of the options, it is recommended that a decision is made to formally withdraw from the GESP project on the basis that there is not commitment from all of the necessary partner authorities to proceed with a joint statutory plan. Proceeding on a statutory plan in the absence of East Devon would significantly risk the soundness of the plan and our collective ability to meet our agreed goals of having shared solutions to common issues and being a nationally significant proposition to government to lever in critical infrastructure funding to support our new and existing communities.

4.1.2. If this is agreed, then in light on not being able to proceed with the GESP, it is recommended that a non-statutory strategy and infrastructure plan is prepared alongside a Local Plan for Teignbridge, in order to address the vital issues that affect the whole of the wider sub-region.

4.1.3. 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.

Appendix 1

Joint planning options appraisal matrix

Option	Scope	Timetable	Resources	Pros	Cons	Comments
<p>1.</p> <p>Baseline: Each LPA progresses its own Local Plan and works with the other LPAs to meet Duty to Co-operate (or replacement)</p>	<p>Determined by each LPA (*).</p> <p>Could include some joint evidence on defined topics as has happened in the past (e.g. housing, gypsy and travellers. habitat mitigation, transport)</p>	<p>Determined by each LPA (*).</p>	<p>Determined by each LPA.</p> <p>No sharing of resources (although could allow for procurement of shared evidence where considered appropriate).</p>	<p>Greater political certainty than joint-working options.</p> <p>No need for joint Governance.</p> <p>LPA only needs to fund a Local Plans team.</p> <p>Timescale fully under control of the LPA and can reflect how far it has progressed to date.</p> <p>LPA only has to resource 1 Examination (Local Plan).</p> <p>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 change, carbon reduction etc.</p>	<p>No opportunity to agree a positive planning framework for cross-boundary planning matters, e.g. climate change, biodiversity net gain, connectivity and (*).</p> <p>Reliant on DtC to address strategic cross boundary issues (*).</p> <p>The option least likely to attract Gov't /Homes England support for housebuilding / infrastructure delivery.</p> <p>Minimum opportunity to attract external funding for studies / evidence base required to support the Local Plan.</p> <p>Procurement of evidence by individual LPAs likely to be less efficient</p>	<p>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.</p> <p>Also, no opportunity to 'spread' any potential housing need asks made by neighbouring authorities (e.g. Torbay).</p>
<p>2.</p> <p>Each LPA progresses its own Local Plan and</p>	<p>Similar to option 1, but with model policies that can be adapted to suit local</p>	<p>Similar to option 1, but will require an element of common Local</p>	<p>Determined by each LPA.</p> <p>No sharing of resources</p>	<p>Opportunity to agree a positive framework for cross-boundary matters like climate change, biodiversity net gain, connectivity and transport.</p>	<p>Reliant on DtC to address strategic cross boundary issues (*).</p>	<p>No comprehensive joint strategic planning (although possibility to implement</p>

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Option	Scope	Timetable	Resources	Pros	Cons	Comments
works to meet the DtC. Local Plans include model strategic policies (*) and are informed by shared evidence where appropriate.	circumstances and limited in scope to cross-boundary matters (e.g. climate change) (*).	Plan timescales across the LPAs, with agreement on model policies to meet those timescales (*).	(although could allow for procurement of shared evidence where considered appropriate). Model policies will require some form of joint working.	<p>Could therefore satisfy many DtC requirements (*). Model wording would not be binding on any LPA.</p> <p>Greater political certainty than other joint-working options.</p> <p>No need for joint Governance.</p> <p>LPA only needs to fund a Local Plans team.</p> <p>LPA only needs to resource 1 Examination (Local Plan).</p> <p>Compared to option 1, provides greater scope for attracting external funding for studies / evidence base required to support the Local Plan.</p> <p>Potential for procuring shared evidence, which may result in efficiency savings.</p> <p>Model policies on key matters may result in less developer confusion (*).</p> <p>Model policies / S106 requirements may reduce opportunity for developers to</p>	<p>Potential for the model policies to be diluted and amended away from the common elements.</p> <p>Questionable if this will demonstrate a collective approach sufficient to attract Gov't /Homes England support for housebuilding / infrastructure delivery.</p> <p>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.</p>	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).

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Option	Scope	Timetable	Resources	Pros	Cons	Comments
				'take advantage' of individual LPAs (*).		
3. Non-statutory Joint Infrastructure Plan (all 4 LPAs)	<p>Government-facing document aimed at securing funding to deliver infrastructure needed to support growth.</p> <p>This could just be growth identified in adopted Local Plans and/or, growth proposed in emerging plans.</p> <p>Could cover all strategic infrastructure, or just DCC infrastructure. Could be prepared by DCC, although would need a level of buy-in from the LPAs in order to secure external funding.</p> <p>Geographic scope</p>	<p>Could be undertaken outside of formal Local Plan timetables if only covering growth in adopted Local Plans. Could be prepared more quickly than a statutory plan.</p>	<p>Determined by each LPA, although will require some form of joint working. Would need specific DCC involvement.</p> <p>Potential to be led by DCC.</p>	<p>Fewer joint governance pressures than options 4-6.</p> <p>Provides a co-ordinated planned response to the area's infrastructure aspirations and constraints.</p> <p>Confirms common aspirations for proactive infrastructure delivery linked to development proposal without the difficulties of joint plan making.</p> <p>Could be successful in securing Gov't / Homes England funding for infrastructure (e.g. the Kent and Medway Growth and Infrastructure Framework¹).</p> <p>Opportunity for a Devon-wide Infrastructure Plan with sub-sections focussing on different areas of Devon to avoid 'watering down' the sub-regional branding.</p> <p>Budget support from LPAs would be significantly less than</p>	<p>Still reliant on DTC to address some strategic cross boundary issues (*).</p> <p>If LPAs want the joint plan to cover growth proposed in emerging plans, the timescale will rely on individual Local Plan timescales. These may vary LPAs.</p> <p>Potential difficulties of preparing a joint infrastructure plan without a cogent joint strategy to hang it on.</p> <p>An infrastructure plan that only sets out infrastructure funding requirements for 'already planned' growth may not demonstrate a collective and ambitious approach sufficient to attract Gov't /Homes England support for housebuilding / infrastructure delivery unless some form prioritisation is</p>	<p>A non-statutory document, therefore fundamentally different to GESP.</p> <p>Can work alongside options 1 or 2.</p>

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.
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Option	Scope	Timetable	Resources	Pros	Cons	Comments
	<p>would need consideration if prepared by DCC.</p> <p>May need an associated governance regime covering funding prioritisation.</p>			<p>existing GESP budget requirements.</p> <p>Although challenging, this provides an opportunity for some form of infrastructure prioritisation which improves the deliverability of key projects.</p>	<p>undertake which could be challenging.</p> <p>An Infrastructure Plan that sets out infrastructure funding requirements for planned and emerging growth will require a greater degree of joint governance.</p>	
4. Non-statutory joint strategy and infrastructure plan	<p>Place-making, aspirational non-statutory plan covering strategic growth and infrastructure.</p> <p>Used to promote the Garden Communities and sub-regional brand, in addition to identifying infrastructure requirements.</p> <p>Part Government-facing document and part strategy document.</p>	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.	<p>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.</p> <p>Provides a co-ordinated planned response to the area's strategic growth and infrastructure aspirations and constraints (more so than 2 and 3).</p> <p>Opportunity to agree a positive framework for cross-boundary matters like climate change, biodiversity net gain, connectivity, transport and development needs. Could therefore satisfy a number of DtC requirements (more so than 2/3) (*)</p>	<p>Will require Local Plans to be adopted before aspirations in the plan can be enforced.</p> <p>Relies on decision-making across multiple Councils for key strategic matters. Therefore potentially more political risky than options 2 and 3).</p> <p>Risks diverting resources away from statutory plan preparation.</p> <p>Non-binding on each Council and at risk of not being followed.</p>	<p>A non-statutory document, therefore fundamentally different, to GESP.</p> <p>Can work alongside option options 1 and 2.</p>

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Option	Scope	Timetable	Resources	Pros	Cons	Comments
				<p>Will identify and help to prioritise common infrastructure requirements</p> <p>Budget support likely to be less than existing GESP budget support.</p> <p>Can be prepared alongside Local Plans.</p> <p>Can be used to promote the Garden Cities.</p> <p>Potential for procuring shared evidence, which would result in efficiency savings.</p> <p>DCC likely to be able to continue supporting the plan's preparation.</p>		
5. Statutory joint strategy and infrastructure plan	<p>High-level statutory plan containing strategic policies and infrastructure requirements.</p> <p>From the outset, LPAs will need to agree:</p> <ul style="list-style-type: none"> - If the plan will include strategic site 	<p>Will need to be adopted in advance of Local Plans.</p> <p>Timetable would need to be jointly agreed.</p>	<p>Will require a dedicated team of officers from the LPAs / DCC. It is likely that additional LPA resource will be needed, as set out in the GESP Options Consultation Committee paper.</p>	<p>Allows for more effective strategic and infrastructure planning and is more likely to attract Gov't / Homes England funding than options 2/3/4.</p> <p>Provides a co-ordinated planned response to the area's strategic growth and infrastructure aspirations and constraints (more so than 2/3/4).</p>	<p>Unlikely to be politically viable at the present stage, given EDDC's Council decision.</p> <p>This option is most inconsistent with the White Paper proposals. E.g. two-tier planning may be inconsistent with zoning proposals. It therefore presents the greatest risk of abortive work.</p>	<p>Same status as GESP. However, scope may differ due to the potential omission of site allocations.</p> <p>Opportunity to introduce district housing targets to help overcome political concerns</p>

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Option	Scope	Timetable	Resources	Pros	Cons	Comments
	<p>allocations or growth areas;</p> <ul style="list-style-type: none"> - If the housing requirement will be planned for on a boundary-blind basis; - If a joint 5YLS will operate*. <p>Matters/sites not covered in the strategic plan will be covered in Local Plans.</p>			<p>Opportunity to agree a positive framework for cross-boundary matters like climate change, biodiversity net gain, connectivity, transport and development requirements. Could therefore satisfy many DtC requirements (more so than 2/3/4) (*)</p> <p>Will identify and help to prioritise common infrastructure requirements</p> <p>Budget support likely to be equal to or less than existing GESP budget support.</p> <p>Can be used to promote the Garden Cities.</p> <p>Would require some shared evidence, which would result in efficiency savings.</p> <p>DCC likely to be able to continue supporting the plan's preparation.</p>	<p>Relies on decision-making across multiple Councils for key strategic matters across all four LPAs.</p> <p>If the plan did not allocate sites it may be of limited value as a statutory document</p> <p>Any timetable delays will potentially affect the timetables of Local Plans.</p> <p>Will require the preparation of another Regulation 18 plan, which is likely to involve at least another 6 months.</p> <p>Greater budgetary requirements for the LPAs than options 2, 3, and 4.</p>	over boundary blind approach.
6. Full statutory joint plan (all 4 LPAs)	A statutory plan containing strategic and local policies, infrastructure requirements and	A single timetable for a single plan. Timetable would need to	The 4 LPAs will pool their existing Local Plans teams, ideally also with resource input from DCC.	It is technically achievable – e.g. Plymouth and South West Devon Joint Local Plan and North Devon and Torridge Local Plan.	Unlikely to be politically viable at the present stage, given EDDC's Council decision.	Same statutory status as, but significantly greater scope than, GESP.

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Option	Scope	Timetable	Resources	Pros	Cons	Comments
	<p>all site allocations.</p> <p>From the outset, the LPAs will need to agree:</p> <ul style="list-style-type: none"> - If the housing requirement will be planned for on a boundary-blind basis; - If a joint SYLS will operate. 	be jointly agreed.	One plan would offer significant efficiencies in terms of evidence costs	<p>Potential for significant skills / resource sharing benefits, through the pooling of existing staff.</p> <p>Of all the options, this will provide the most co-ordinated and comprehensive planned response to the area's strategic growth and infrastructure aspirations and constraints.</p> <p>This option will demonstrate to Gov't / Homes England the greatest level of ambition and collaboration on planning matter. It's therefore most likely to attract funding and support for delivery.</p> <p>This presents the greatest opportunity to deliver a positive framework for cross-boundary matters like climate change, biodiversity net gain, connectivity, transport and development requirements. It will satisfy all DtC requirements within the sub-region (*).</p>	<p>Relies on decision-making across multiple Councils for key strategic matters across all four LPAs.</p> <p>Potential for perceived loss of individual LPA control.</p> <p>Potential for abortive work, as may find that the plan boundaries don't coincide with possible future unitary boundaries.</p>	<p>Opportunity to introduce district housing targets to help overcome political concerns over boundary blind approach.</p> <p>Potential to consider single plan without the need for district local plans, particularly if the Government reforms establish a national set of development management policies.</p>

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				<p>Will identify and help to prioritise common infrastructure requirements.</p> <p>Can be used to promote the Garden Cities.</p> <p>Requires procuring shared evidence, which would result in efficiency savings.</p> <p>Isn't contrary to Government thinking in White Paper.</p>		

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