

Draft Action Plan For Completion of the East Devon Local Plan – This Draft – 8 May 2014

Subject Matter in Letter	Para No/s	Main Issues raised by the Inspector	Action or Consideration to address the issues	Notes
Housing Numbers and SHMA	1 - 2	<ul style="list-style-type: none"> Need for an updated SHMA to inform housing numbers in the plan. 	<ul style="list-style-type: none"> Consultants have already been appointed by East Devon, Mid Devon, Exeter City, Dartmoor National Park and Teignbridge to produce a new SHMA and work is ongoing, projected completion – June 2014. 	SHMA outputs will set out an objective figure of housing need that is informed by trend based assessment and will take into account issues of past possible undersupply and also responding to market signals and other relevant information. The SHMA does not dictate policy outcomes but does inform options. Completion of the SHMA and its findings will be instrumental in determining other areas of future work.
Strategic Environmental Assessment / Sustainability Assessment	3	<ul style="list-style-type: none"> If SHMA or other work points to alternative housing levels then principles of provision (and thereafter matters of detail) should be tested through SEA/SA process. 	Potential need to undertake SEA/SA into: <ul style="list-style-type: none"> Principle of possible changed levels of development (inc extended plan life); Possible changes to distribution; and Potential new site allocations (or de-allocation) for development. 	SEA/SA is a process concerned with assessing potential impacts and implications of alternative development strategies and options. It informs (but does not determine) decision making. We may need or want to appoint consultants to undertake work.
Joint Working with West Dorset District Council	4	<ul style="list-style-type: none"> Need for cross boundary working. 	Proposed production of joint working/report aiming for: <ul style="list-style-type: none"> Understanding objectively assessed housing needs at/in vicinity of Lyme Regis and environs; A joint West Dorset and East Devon Strategy or common approach for distribution of development in the area; and Coherent comparative assessment of sites options and choices. 	Under the Duty to cooperate we need to work with neighbouring authorities to understand collective need for development and possible options for accommodating this need.

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5 Year Land Supply	5-7	<ul style="list-style-type: none"> • 5YLS should aim to deal with any under-supply in the first 5 years of the plan (suggests the Sedgefield approach). • Improving supply of sites for the first 5 years should be plan led (eg allocate more sites to come forward in the first 5 years). • Must be able to demonstrate that we will have a 5YLS upon adoption of the plan. 	<p>Work to include:</p> <ul style="list-style-type: none"> • Housing supply assessment (existing commitments) to be updated in April/May 2014. • Depending on results of SHMA and rerunning five year assessment work consider allocation of additional sites for development. <p>Depending on conclusions from this and other work there may be the need to review the Strategic Housing Land Availability Assessment work to inform on choices for new sites (potentially including for gypsies and travellers).</p>	Five year land supply assessment is concerned with ensuring sufficient available sites exist to meet the next five years worth of housing need.
Housing Distribution in small towns and villages and Strategy 27	8	<ul style="list-style-type: none"> • Numbers are not based on an assessment of the ability of small towns and villages to accommodate growth. • 5% minimum growth too crude a tool. • Post submission changes suggest 5% as a maxima. • Settlement appraisals do not support figures in Strategy 27. 	<p>Review settlements deemed appropriate for development (specifically those proposed to have BUAB's) and the levels that could be appropriate based on:</p> <ul style="list-style-type: none"> • Landscape Appraisal; • Sustainability Appraisal; • Facilities Checklist; and • Consultation Feedback. 	Review work will need to look at suitability of differing village settlements to accommodate growth and the appropriate levels of growth that those settlements can or should reasonably accommodate.
Plan Period	9 - 10	It is suggested in the report that we should consider a longer end date to the plan.	The SHMA is likely to cover the 2014 to 2033 period also employment needs data is available to 2031. It could be a realistic option to extend the life span of the plan.	Whilst not requiring a 15 year or more lifespan it is encouraged for local plans in the NPPF.

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Gypsies and Travellers	11	<ul style="list-style-type: none"> • Supports commission of joint assessment. • Doesn't support separate gypsy plan. • Opportunity to accommodate need identified in study through the Local Plan rather than a separate gypsy plan. 	<p>If we were to identify brand new sites then timetable for work is likely to need to accommodate:</p> <ul style="list-style-type: none"> • A call for sites; • Assessment of sites; • Consultation. 	<p>If the study identifies a need for further sites and we do not do a separate gypsy plan then these may or could be allocated through the Local Plan or perhaps through the villages plan. The consultants report is expected in July 2014.</p>