

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: EAST DEVON LOCAL PLAN 2013 TO 2031 REVIEW ASSESSMENT

Introduction

Local plans should be reviewed to assess whether they need updating at least once every five years.¹ Once the review is complete, plans should then be updated as necessary. The East Devon Local Plan 2013 to 2031 was adopted on 28 January 2016, so the review must be completed by 28 January 2021.

The Planning Advisory Service (PAS) has produced a [Local Plan Route Mapper & Toolkit](#) to assist local planning authorities in undertaking a review and update of local plan policies. This is intended to supplement the [National Planning Policy Framework](#) and associated [National Planning Practice Guidance](#) on the review of policies within the plan. PAS state that completing the matrix will help local authorities understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help to focus on whether and to what extent, an update of local plan policies is required.

This part of the toolkit (Part 1) deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF – this has been completed for the East Devon Local Plan 2013 to 2031, and is available as a separate document. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF; and Soundness and Plan Quality issues are dealt with in Part 4. It is envisaged that we will revisit parts 3 and 4 of the toolkit in preparing a revised local plan.

The following matrix contains a series of “matters to consider” – the East Devon Local Plan 2013 to 2031 has been assessed against each of these, and a decision is made as to whether the local authority:

- Disagree (on the basis that the plan does not meet the requirement at all);
- Agree (on the basis that we are confident that the current plan will meet the requirement)

The results of this assessment has informed the decision (A17 in the following matrix) as to whether or not the Local Plan should be updated, and the reasons for that decision.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Regulation 10A; NPPF paragraph 33.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the 'content' requirements of the current NPPF (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Disagree	<p>This matter is considered in more detail in Part 2 of the toolkit, which has assessed the Local Plan against each of the 98 NPPF requirements. In summary, whilst much of the Local Plan meets NPPF requirements, there are many aspects of the NPPF which are not fully reflected. This is not surprising since the Local Plan was adopted three years prior to the latest version of the NPPF. The findings indicate that the Local Plan meets 35 NPPF requirements, particularly in the sections relating to General requirements, Plan content, Healthy and safe communities, and Transport. The chapters where the Local Plan only partially meets NPPF requirements generally fall within Housing, Economy, Communications, Natural environment, Effective use of land, and Design. The Local Plan does not meet 15 requirements, mainly for the NPPF chapters on Town centres and Climate change.</p> <p>Overall, the East Devon Local Plan 2013 to 2031 does not fully reflect the requirements of the NPPF. Therefore, it is recommended that the Local Plan is revised to address this matter.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a</p>	Agree	<p>The Local Plan (Strategy 1) makes provision for a minimum of 17,100 dwellings over the plan period 2013 to 2031, an average of 950 dwellings per year. The NPPF (para 60) states that policies should be informed by a local housing need assessment, conducted using the standard method in national guidance. Applying this guidance, the East Devon Local Housing Needs Assessment (2020) identifies the minimum local housing need in East Devon as 900 dwellings per year. This is not significantly different from the Local Plan; but the assessment notes that the Government intend to comprehensively review the standard method over the next year.</p>

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	comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.		In August 2020, the Government published proposals for consultation that would increase East Devon's annual housing requirement to 1,614 dwellings per year. However, the Government changed their proposals following consultation, meaning that East Devon's indicative local housing need figure is 928 dwellings per year, so very similar to the local plan requirement of 950 dwellings per year.
A3.	You have a 5-year supply of housing land PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book	Agree	The Local Plan (Strategy 1) makes provision for a minimum of 17,100 dwellings over the plan period 2013 to 2031, an average of 950 dwellings per year. The Housing Land Supply position at the end of 2019/20 is 5.73 years.
A4.	You are meeting housing delivery targets PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.	Agree	Housing Delivery Test result for 2015/16-2017/18: 149% Housing Delivery Test result for 2016/17-2018/19: 121% Housing Delivery Test result for 2017/18-2019/20: 122% Therefore, the council is meeting housing delivery targets.
A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.	Agree	i) The Local Plan does not contain an objective relating to the total number of affordable homes to be delivered, but supporting evidence in the Strategic Housing Market Assessment (SHMA) 2014/15 indicates a need for 272 affordable dwellings per year. As shown below, this figure was exceeded last year, but has

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	<p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>		<p>generally been below the need in the SHMA, with an average of 246 affordable homes per year being delivered over the plan period so far.</p> <p>The percentage of all new homes delivered in the district that are affordable since beginning of the Local Plan period:</p> <table border="0"> <tr> <td>2013/2014: 245 – 29.5%</td> <td>2014/2015: 356 – 34.6%</td> </tr> <tr> <td>2015/2016: 203 – 19.8%</td> <td>2016/2017: 110 – 15.2%</td> </tr> <tr> <td>2017/2018: 213 – 24.6%</td> <td>2018/2019: 237 – 25.5%</td> </tr> <tr> <td>2019/2020: 356 – 33.4%</td> <td>Overall: 26.1%</td> </tr> </table> <p>AH targets (Strategy 34) are that, for sites above the national threshold,² 25% of new housing in Axminster, Exmouth, Honiton, Ottery, Seaton and the major strategic West End sites is affordable, and 50% elsewhere. Exception sites (Strategy 35) must contain at least 66% affordable housing. Evidence gathered to inform the CIL review³ indicated that affordable housing delivery on a selection of sites between 2016-2019 was 200 below the target.</p> <p>ii) The Local Plan allocates land for employment development (with a district-wide total of around 150 hectares of employment land in Strategy 1) but does not actually have any policy or reasoned justification to policy that sets targets for amounts of floor space to be developed or new jobs created. In supporting evidence to the plan, see: https://eastdevon.gov.uk/media/3405650/ash-futures-employment-projections.pdf work was undertaken looking at projected future job number estimates in the district, but this work was used to inform overall housing targets to ensure that there would be sufficient homes to house the workers to fill jobs,</p>	2013/2014: 245 – 29.5%	2014/2015: 356 – 34.6%	2015/2016: 203 – 19.8%	2016/2017: 110 – 15.2%	2017/2018: 213 – 24.6%	2018/2019: 237 – 25.5%	2019/2020: 356 – 33.4%	Overall: 26.1%
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² The threshold for when affordable housing is required is set in the NPPF. In Exmouth, Honiton, Seaton and Sidmouth the threshold is 10 dwellings or more; elsewhere, in the designated rural areas, the threshold is six dwellings.

³ East Devon CIL Draft Charging Schedule consultation document, August 2019, para 2.18.

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			<p>rather than forming a jobs target in its own right. Nevertheless, Strategy 31 does seek one job per new home for large scale major housing sites (200+ dwellings). In general terms (i.e. not directly related to delivery of the Local Plan), the number of jobs in East Devon has risen in recent years, from 45,000 in 2015 to 48,000 in 2018 (source: BRES data produced by the ONS).</p> <p>The Local Plan includes an objective to improve average income levels – gross weekly pay in East Devon has increased from £468/week in 2013, to £550/week in 2019 (source: Nomis), although it remains below the regional and national averages.</p> <p>A total of 282,234 sq m of net additional floorspace of employment land has been delivered so far in the Local Plan period (Employment Land Review 2019/20, published Oct 2020). 77.32 ha of employment land has been completed/delivered so far in the plan period (2013-20), with 109.62 ha of employment land currently available (under construction, planning permission not started, allocated or otherwise available), so delivery of 150 ha across the plan period 2013-2031 remains achievable (Employment Land Review 2019/20, published Oct 2020).</p>
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p>	Disagree	<p>There are significant unknowns about the future state of the local economy as a consequence of Covid-19 – with, as elsewhere, expected rise in unemployment levels (albeit from a low base) and in home and flexible working. Immediately prior to lockdown the collapse of Fly-Be was also of great local significance with the airline being based at Exeter Airport and one of the main airport based employing organisations. There have also been notable losses of other significant employers in high value sectors including Axminster Carpets, ITT/Goulds and Goonvean Fibres Ltd. Whilst the adopted local plan does not have specific job growth targets the policy provision in the plan, specifically larger scale land allocations, provides/provided scope for substantial job growth. Larger scale land allocations</p>

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	<p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>		<p>were concentrated at the West End of the district and whilst all sites (bar Phase 2 of the airport business park) have seen some development rates of land-take are variable. Skypark, in particular has seen limited development.</p> <p>To date a formal assessment of the deliverability of larger scale employment land allocations in the current local plan has not been undertaken but on large sites, outside of the West End, starts on site have not occurred at Heathpark extension Honiton, north-east urban extension Axminster, north of Seaton and Goodmores Farm Exmouth (though the last one, a mixed use allocation, has outline approval).</p> <p>Major new employers have been secured, most notably Amazon and Lidl Distribution which as B8 uses (warehousing & distribution) support job growth, but typically offer lower paid/skilled employment. The Local Plan, however, sees future B1 employment development (office developments), and jobs in this class, as being key.</p>

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A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>The viability of planned development was considered through the CIL Review and Cranbrook DPD Viability Study (Three Dragons, Jan 2019); and recently subject to Examination through the revised Community Infrastructure Levy Draft Charging Schedule. The CIL Examiner's Report (June 2020) confirms that the levy rates are consistent with legislation and guidance by achieving a reasonable level of income to address a gap in infrastructure funding, whilst ensuring that a range of development remains viable across East Devon.</p>
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type.</p>	Disagree	<p>As discussed under A6, on large employment sites, outside of the West End, starts on site have not occurred at Heathpark extension Honiton, north-east urban extension Axminster, north of Seaton and Goodmores Farm Exmouth (though the last one, a mixed use allocation, has outline approval).</p> <p>A summary of progress on the Local Plan housing allocations is set out below:</p> <ul style="list-style-type: none"> • Local Plan Strategy 12: Cranbrook – 2,174 out of 3,487 new dwellings on the main new town permission now completed. • Strategy 13: Mosshayne / North of Tithebarn Lane - Reserved matters approved May 2019. • Strategy 20: Axminster Masterplan – Applications 19/0108/MOUT, 19/1074/MOUT and 19/0150/MFUL are currently under consideration.

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			<ul style="list-style-type: none"> • Strategy 22: Goodmores Farm, Exmouth – Outline permission granted August 2019; reserved matters application validated June 2020. • Strategy 23: Ottery Moor Lane, Honiton – Reserved matters approved July 2019, under construction. • Strategy 25: Land north of Rowan Drive, Seaton – 35 out of 36 new dwellings now completed. • Strategy 26: Former council offices, Sidmouth – planning permission for assisted living community of 113 extra care units for older people approved in Jan 2018. • Strategy 26: Manstone Depot, Sidmouth – Approval now given for a single-story office block rather than housing. • Strategy 26: Port Royal, Sidmouth – unlikely to go forward in the form identified in the Local Plan, recent announcement that eastern part of the site to become a restaurant. • Strategy 26B: Winslade Park, Clyst St Mary – outline application submitted May 2020, pending a decision. <p>This shows that the majority of Local Plan housing allocations are under construction or have planning permission. Of the sites above, lack of delivery at Manstone Depot and Port Royal, Sidmouth is not considered to put the spatial strategy at risk given the small number of homes allocated on these sites (30 on each). However, as discussed below in requirement A11, although planning applications have been submitted for the Axminster site, there is doubt on whether the Axminster relief road proposed in the allocation can be delivered given its cost (£16.7m). As a result, the delivery of this Local Plan allocation is in doubt, putting the spatial strategy at risk.</p>
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p>	Agree	<p>It has not been possible to monitor some Local Plan environmental indicators, such as those relating to change in biodiversity areas/populations. There have been no changes to European site designations in East Devon or to our knowledge</p>

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	<p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p>outside of the District where impacts from within East Devon would be predicted to have significant adverse impacts.</p> <p>An established programme (South and East Devon Habitat Regulations Executive Committee), functioning jointly by East Devon District Council, Teignbridge Distract Council and Exeter City Council, draws developer contributions and provides mitigation in respect of adverse impacts that would otherwise occur on the Exe Estuary, the Pebblebed Heaths and Dawlish Warren European sites.</p> <p>Clyst Valley Regional Park Masterplan is progressing (public consultation in December 2020), and this should be reflected in a revised Local Plan.</p> <p>A concern relates to the river Axe with elevated levels of Phosphates from new housing contributing to the failing standard of this European site – as set out in the Local Plan (Strategy 20), this issue is being addressed through a Nutrient Management Plan.</p> <p>In general, habitat mitigation measures, including SANGs provision, continue to be delivered in accordance with development proposed in the adopted Local Plan. However, additional measures are likely to be required in preparing a revised Local Plan.</p> <p>Since adoption of the Local Plan, surface water flood maps have been published by the Environment Agency, which has implications for the Local Plan policies and approach, as the NPPF requires policies to consider flooding from all sources. Nevertheless, surface water flood maps are being considered in determining planning applications, so it is not affecting decision making despite the lack of local plan policy.</p>

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			<p>Improvements to air quality mean that the Honiton Air Quality Management Area was removed in 2017.</p> <p>The Environment Bill includes a requirement for a 10% biodiversity net gain – if enacted, this will have significant implications for the Local Plan policies and approach.</p> <p>Overall, there are no significant changes to the local environmental or heritage context which could impact on the delivery of housing or employment.</p>
A10.	<p>There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Disagree	<p>Work on the Greater Exeter Strategic Plan identified several large scale sites within East Devon that are available for development submitted through the Housing and Employment Land Availability Assessment 'call for sites' (HELAA dated June 2019), particularly in the West End. Although East Devon has decided to withdraw from the GESP, new sites have become available through that process, so the Local Plan does not meet this requirement.</p>

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A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Disagree	<p>Local Plan Strategy 50 sets out the approach to infrastructure delivery, seeking developer contributions to ensure that necessary infrastructure improvements are secured through CIL or s106. Key planned infrastructure projects in the Local Plan are focussed at the 'West End' and the main towns. Significant infrastructure projects identified in the Local Plan that have been delivered include Tithebarn link road; district heating network in the West End; new primary school at Pinhoe; and improvements at Turks Head junction, Honiton.</p> <p>The Infrastructure Delivery Plan (IDP, Nov 2017) identifies critical projects as 'priority one' – whilst some of these have been delivered since it was published in 2017 (e.g. habitat mitigation ongoing, enhanced bus service in the West End, Honiton Primary School extension) or benefit from some funding (e.g. Long Lane enhancements, Exmouth Community College improvements), other projects are related to development that is not yet underway (e.g. Axminster education facilities and relief road associated with the north and east allocation), or otherwise not started (e.g. Dinan Way extension, Exmouth; Waterloo train line passing loop).</p> <p>Local Plan Strategy 20 (and the IDP) include the Axminster relief road (total cost around £16.7m) to be delivered as part of the north/east allocation. This project had a successful £10m Housing Infrastructure Fund bid from the Government in 2019, but this was later announced as a recoverable loan with terms that couldn't be met – therefore, the funding was withdrawn in early 2020. As a result, the delivery of this Local Plan allocation is in doubt.</p> <p>There are no new major infrastructure programmes with implications for the spatial strategy, but overall, there are some key infrastructure projects critical to Local Plan delivery that have stalled. Although there remains time in the plan period,</p>

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			<p>uncertainty on the delivery of some projects (e.g. Axminster relief road) means that the Local Plan does not meet this requirement.</p>

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A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Disagree	<p>The Local Plan contains a total of 121 policies, comprising 53 strategic policies and 68 development management policies. This is a large number of policies, and it could be argued that some do not go to the heart of delivering the Plan's strategy.</p> <p>As set out in matter A1 and Part 2 of the Toolkit, some Local Plan policies are not fully compliant with the NPPF, and there are some policy gaps. For example, there is no Local Plan policy which deals with the risk of flooding from surface water (since adoption of the Local Plan, surface water flood maps have been published by the Environment Agency).</p> <p>In addition, changes to the General Permitted Development Order (GPDO) mean that some Local Plan policy requirements no longer apply, as some types of development no longer need planning permission e.g. policy E10 Primary shopping frontages. Similarly, the Use Classes Order changed significantly in September 2020 – use classes are referenced in Strategy 32 and policy E9.</p> <p>Some policies cover specific matters which are no longer capable of implementation e.g. “allowable solutions” as set out in Strategy 41 are no longer being pursued by national Government.</p> <p>Some strategies have been superseded or decisions have been taken that mean they can no longer be implemented, such as the intermodal interchange proposed in Strategy 15 being replaced with a supermarket distribution centre and Cranbrook being expanded through the Cranbrook DPD.</p> <p>Strategic policies relating to individual towns continue to be relevant but the figures and references to specific development sites are now outdated and have largely been built. In some towns, such as Axminster, additional development is now</p>

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			<p>proposed to deliver the strategic aims but this conflicts with the adopted housing figures.</p> <p>In terms of appeals performance, the council had a 75% success rate in planning appeals in 2019/20, an improvement on the previous year and higher than the national average of 66% (EDDC Planning Appeals status report, July 2020). There are no particular trends to the council decisions being overturned at appeal that suggest Local Plan policies should be revised, although it is noted that Inspectors deciding householder appeal decisions generally consider that the proposal would result in a significant adverse impact on the amenity of neighbours or the character and appearance of the area for an appeal to be dismissed. The interpretation of Policy E18 was challenged through the High Court and requires clarification in a new Plan.</p> <p>There is some duplication (and potential contradiction) of matters between DM policies e.g. there is confusion as to when Policies E5 and E7 apply- under which policy does a large extension into the countryside of a business fall?</p> <p>There is scope to combine policies which would add clarity, ensure more comprehensive coverage of matters and avoid duplication and contradiction e.g. there is overlap between the town centre/shopping policies and changes to the Use Classes are not reflected in them (E9-12); the tourism policies E17 and E18 could be amalgamated and clarified regarding protection of existing accommodation now it has been clarified that E18 only applies to Exmouth, Budleigh, Seaton and Sidmouth; clarity is required between the tourism policies E16 and E19; the community facilities policies (RC5, RC6 and RC7) overlap.</p> <p>Some policies could be extended to cover a wider remit, e.g. TC9 could also address parking for non-residential development</p>

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			<p>and additional areas arising in the updated NPPF could be covered e.g. space standards.</p> <p>Some DM policies lack the resources to assess the requirements or monitor their implementation e.g. policy E15 which sets percentages of goods to be sourced on a holding, nearby and from elsewhere.</p>

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A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Mid Devon recently adopted its Local Plan Review (July 2020), making provision for a minimum of 7,860 dwellings over the period 2013-2033. This includes several large scale allocations, the closest being east Cullompton, but there would not be a material impact upon the planning context in East Devon.</p> <p>Emerging plans have been published by Somerset West and Taunton and Teignbridge district councils over the last year (2019-20), but no significant development is proposed that would impact upon East Devon. There is potential for development proposed in the adopted South Somerset Local Plan, and its emerging review, to adversely impact upon the River Axe Special Area of Conservation (SAC) in East Devon. This issue is being addressed through partnership working.</p> <p>Although not a 'development plan', Exeter City Council's planning context is changing through publication of 'Liveable Exeter – a transformational housing delivery programme' (Feb 2019). This includes a proposal for a mixed-use community of around 1,000 dwellings at Sandy Park, adjacent to the East Devon border. This could have impacts upon East Devon e.g. through recreation pressure upon the Exe Estuary and Pebblebed Heaths European sites. However, this site will be subject to further assessment before the proposal comes forward and, as noted under requirement A9, a joint habitat mitigation approach should limit any adverse impacts.</p> <p>Overall, there are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on East Devon.</p>

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A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Disagree	<p>Significant local political changes arose from the May 2019 elections which meant that there was no overall control of councillors from a single political party (the Conservative party had held a majority for 45 years). This meant an Independent Group running the council until May 2020, when political changes resulted in a new coalition administration.</p> <p>A Council Plan was published in 2019 which highlights the importance of delivering the Local Plan. A new Council Plan is being prepared to reflect the priorities of the new administration.</p> <p>In summer 2019, East Devon, along with most other local authorities, declared a “climate emergency”. The council signed up to the Devon Climate Change Declaration with the aim to become carbon neutral by 2040. Although climate change mitigation and adaptation is considered in the Local Plan, further detail and updating is required to reflect the climate emergency.</p> <p>These factors indicate a change to the current Local Plan is likely to be required.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p>If <u>no</u> go to question A16.</p> <p>If <u>yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below
A17.	<p><u>Decision:</u> Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies: The Local Plan does not meet several of the matters to consider, noted as “disagree” above. In summary, these relate to:</p> <ul style="list-style-type: none"> • Matter A1: the Local Plan does not fully reflect the requirements of the NPPF. • Matter A6: there have been significant changes to economic conditions that could challenge delivery of the Local Plan. • Matter A8: some key site allocations are not delivering or on course to deliver. • Matter A10: new sites have become available through evidence gathered on the Greater Exeter Strategic Plan. 		

- Matter A11: key planned infrastructure projects critical to delivery of the Local Plan have stalled.
- Matter A12: not all policies are achievable and effective for the purpose of decision-making.
- Matter A14: there have been local political changes that would require a change to the approach set out in the current plan.

Therefore, an update of Local Plan policies is required. Given the matters identified above, the scope and extent will be a full policies update to the Local Plan.