

East Devon Local Plan 2020-2042

Statement of Consultation

**East Devon Local Plan - proposed Submission
plan: 2020-42 (at Regulation 18 stage)**



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1 Introduction

Purpose of the statement

- 1.1 This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the East Devon Local Plan 2020 to 2042 in accordance with Regulations 18 and 19 of [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#). This Local Plan will replace the current, adopted East Devon [Local Plan 2013-2031](#).
- 1.2 This statement, will in due course, be updated or reworked/replaced (as appropriate) to meet Regulation 22 (1)(c) of the plan making regulations. Consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the Council's adopted Statement of Community Involvement (SCI) (January 2021).
- 1.3 The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed on the East Devon District Council website - [Statement of Community Involvement](#).

Background information

- 1.4 This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the new Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation and representations.
- 1.5 The Council began preparing a new Local Plan for the district in 2019. The new Local Plan will set out the strategic vision, objectives and spatial strategy for the district, as well as the planning policies which will guide future development. The Plan will look ahead to 2042 (though setting a policy agenda for development at the (new) new community for beyond that) and identify the main areas for sustainable development growth. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).
- 1.6 The Council's Proposed Submission Local Plan (the Publication plan) and supporting documents, including the sustainability appraisal, will be published in accordance with Regulation 19 for a six week consultation period, details of consultation dates are published on the council web site – see [Regulation 19 Local Plan Consultation - forthcoming - East Devon](#). The Council has consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement.

Structure of this statement

1.7 This statement of consultation comprises three sections:

Section 1 – forms this introduction.

Section 2 - sets out the timeline which has been followed in preparing the Local Plan which is accordance with the up to date Local Development Scheme – see [What policy documents will we produce and how will we consult on them? - Local Development Scheme - East Devon](#)

Section 3 - summarises (specifically through links to supporting documents that form part of this statement) the main issues raised during the course of the consultation carried out under Regulation 18 and how the comments received have been considered by the Council. In particular it sets out:

- who was invited to make representations and how;
- a summary of the main issues raised by those persons;
- how those issues have been addressed in the preparation of the Local Plan;

1.8 Section 3 is supported by two schedules:

Schedule 1 - sets out summary details of the main bodies that have been consulted through plan making up to the Regulation 19 Publication stage.

Schedule 2 – provides links to documents that support and form part of this statement, setting out summary details of representations received and a council officer response to these comments. This schedule also includes a table setting out policies at the draft plan, at the key Regulation 18 stage of plan making, the corresponding policy (if applicable) at the Regulation 19 Publication stage of plan making and a summary commentary on key changes made with reasons why.

2 Plan Production Timeline

- 2.1 The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required.
- 2.2 The timetable below outlines the main stages in the preparation of the East Devon Local Plan up until February 2025 when the Regulation 19 version of the Plan will be published, and thereafter it sets out projected timelines for future work. An account of this process, with links to key documents can be found on the councils website [Emerging Local Plan 2020-2042 - East Devon](#). Unless otherwise indicated, all references to the Local Plan are to the new, emerging Local Plan 2020-2042.

Key Local Plan work stages - undertaken and planned

1: Identify issues and collect evidence: 2019/2020

The resolution to commence production of a new local plan was taken by Strategic Planning Committee on 29 January 2019, and Members agreed a project plan and timetable for this work. The Council subsequently reviewed existing policies, identified any current gaps in policies or evidence bases.

2: Issues and Options consultation- January 2021-March 2021

Consultation on an [Issues and Options report](#) informed the first stage of preparing the new East Devon Local Plan. This set out differing options/approaches that the plan could take and ran from January to March 15 2021. Alongside the Issues and Options consultation we also ran a Call for Sites, where people could submit land for development; and a Sustainability Appraisal scoping report consultation, to ensure that potential social, environmental and economic considerations would be taken into account in preparing the Plan. Responses can be viewed on this webpage [Issues and Options - Jan to Mar 2021 - Representations on the Issues and Options consultation - East Devon](#)

3: Draft Local Plan consultation (Reg 18) – 7 November 2022- 15 January 2023

The Council consulted on a full draft version of the Local Plan and policy maps, supported by the updated evidence base, supporting documents and the sustainability appraisal. Consultation was open for a 10 week period. Responses can be viewed on this webpage [Comments made during the Draft Local Plan Consultation and Feedback Report - East Devon](#)

The Council took on board comments received during the draft Local Plan consultation and amended the Plan to reflect representations received and in the light of ongoing evidence

production. Further evidence base documents were updated or commissioned.

4: Further Draft Local Plan consultation (Reg 18) –16 May 2024 – 27 June 2024

In response to feedback on the Draft Local Plan consultation, a further consultation was held on eight specific topics:

- 1 New Housing and Mixed Use Site Allocations
- 2 New Employment Site Allocations
- 3 Designated Neighbourhood Area Housing Requirements
- 4 Clyst Valley Regional Park
- 5 Town Centre Retail Areas
- 6 Coastal Preservation Area
- 7 Green Wedges
- 8 Sustainability Appraisal

Comments made in response to the consultation can be viewed on this webpage [Further Draft Local Plan Consultation - May to Jun 2024 - East Devon](#)

5: Plan amendments – January 2023 to January 2025

The Council made changes to the draft plan to address comments received during consultation on the Draft and Further Draft Local Plans, recommendations from the Sustainability Appraisal, further evidence, changes in national planning policy and guidance and general factual updates.

The Sustainability Appraisal and evidence base documents were updated and a consultation report was produced. At this stage there were a large number of lengthy committee meetings held to discuss emerging plan content and people were given to opportunity to make verbal and for some written representations to the Council.

6: Publish the Plan (Pre-Submission Consultation Reg 19) – February 2025

THIS IS THE CURRENT STAGE OF PLAN MAKING WORK

Following a resolution by Strategic Planning Committee on 4 February 2025, the Proposed Submission Version of the Local Plan and the Policies Map will be published for comment for a 6 week period between 13 February and 31 March 2025. Supporting documents will also be published during this period, including the consultation reports on the Regulation 18 consultations and supporting evidence. In accordance with Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012, representations will be invited specifically on the Plan's legal compliance and soundness for examination. It should also be noted that a second stage of consultation (specifically in respect of new community proposals) is planned to start in Spring 2025.

7: Submission to the Secretary of State:

The Council will assess the comments received during the regulation 19 formal consultation and, provided the Plan is considered sound, it will be submitted for Examination in Public (EiP). The Plan will be submitted to the Secretary of State, this is scheduled to be in Autumn 2025.

8: Examination: This starts at the point the plan is Submitted

The Plan will be examined by an independent Planning Inspector.

9: Adoption:

Plan adoption is predicted to be in late 2026/early 2027.

3 Summary of the consultation process

Consultation processes followed to date in production of the plan

- 3.1 Public consultation, in the form of issuing written consultation documents and inviting feedback, under 'Regulation 18 of the Town and Country Planning (Local Plans)(England) Regulations 2012' took place in three stages.
- Stage 1 involved an initial round of consultation on issues and options for the new Local Plan over 6 weeks between January and March 2021.
 - Stage 2 involved consultation on a full Draft Revised Local Plan and took place over ten weeks between November 2022 and January 2023.
 - Stage 3 involved a consultation for 6 weeks between May and June 2024 on a further, topic specific, Draft Local Plan.
- 3.2 Regulation 19 pre-submission publication will take place for six weeks between February and March 2025. Following this, further work will update on feedback received and other relevant matters as required under the regulations.
- 3.3 The plan making regulations set out needs to report on:
- (i) Which bodies and persons the local planning authority invited to make representations under Regulation 18
 - (ii) How those bodies and persons were invited to make representations under Regulation 18
 - (iii) A summary of the main issues raised by the representations made pursuant to Regulation 18
 - (iv) How any representations made pursuant to Regulation 18 have been taken into account.
- 3.4 More detail on the three formal stages of consultation of public consultation at Regulation 18 are summarised below, as is a fourth engagement stage through Council committee meetings.

Stage 1 – Issues and options consultation

- 3.5 This stage involved an initial round of consultation on issues to be considered in the Local Plan review. It lasted 7 weeks from January to March 2021 and was based on a questionnaire and online consultation material (paper copies were also available). 702 respondents submitted a total of 598 responses, the majority via online questionnaire but with 51 answering by email or post.

Stage 2 – Draft plan consultation

- 3.6 This stage involved consultation on a full Draft East Devon Local Plan and took place over ten weeks from 8 November 2022 to 15 January 2023. The consultation was supported by exhibitions and the plan featured on an online portal, where comments could be made directly, as well as documents being available in pdf format and people could comment by sending in emails and letters. We received comments from around 2,500 people and organisations through online channels and around 1,000 through letters and emails, there were also some petitions received. All of the policies in the plan were available for comment as well as sites that we had assessed as offering potential for built development.

Stage 3 – Further consultation

- 3.7 This stage involved further consultation on eight topics:
- New Housing and Mixed Use Site Allocations
 - New Employment Site Allocations
 - Designated Neighbourhood Area Housing Requirements
 - Clyst Valley Regional Park
 - Town Centre Retail Areas
 - Coastal Preservation Area
 - Green Wedges
 - Sustainability Appraisal
- 3.8 This further Local Plan Consultation was also at the Regulation 18 stage and ran from 16 May 2024 until 27 June 2024. The consultation was hosted on Commonplace (the Council's chosen citizen engagement platform) but people could also comment by sending in emails and letters. An accessible PDF version incorporating the contents of the Commonplace site was made available upon request. We received comments from 1,284 people and organisations through Commonplace channels and 234 letters/emails.

Stage 4 – Presentations to committee meetings and engagement

- 3.9 Whilst we would not categorise it as a formal consultation, and there were no consultation documents published for people to comment on, various aspects of the plan, specifically including potential site allocations were discussed at council meetings in 2023 and more so at council meetings in 2024. At these meetings prospective developers (typically through their agents) were given the opportunity to promote the merits of sites they would wish to see allocated for development. Any third parties (and in practice this included parish councils and members of the public) were also given the opportunity to speak. Typically most comments were in opposition to site allocations, and in many cases the principle of development at differing localities, but there were some submissions in support.

- 3.10 We set out below further information on consultation undertaken and Schedule 1 of this reports provides more detail on individuals, bodies and organisations that were consulted.

Who was consulted under Regulation 18 and how was it undertaken?

- 3.11 **Stage 1 Consultation on the Issues** – in accordance with the Council’s [Statement of Community Involvement](#) a range of techniques were used to raise awareness of this, initial, consultation and encourage people to participate and respond, particularly hard to reach groups. This included email notifications to all those on the Council’s planning policy consultation database (which includes the statutory, specific and general consultation bodies required by the Regulations) and to wider lists of contacts; letters to landowners; an article in the Council online newsletter; press releases; blog posts and social media. A communications plan, highlighting key communication activities that were undertaken can be viewed on the Council website [Communications Plan](#).
- 3.12 As the consultation took place immediately after the pandemic, there was a strong focus on online engagement and this included a social media campaign of content and paid-for posts that targeted specific audiences and included attractive images and content. The publicity methods aimed to target the full range of stakeholders, including those who had been characterised as ‘harder to engage’ and those with protected characteristics. In addition to more traditional publicity methods, ward councillors, community groups and networks were encouraged to raise awareness about the consultation through word of mouth and ‘cascading’ amongst their constituents and members.
- 3.13 The issues and options report asked a number of questions and we specifically requested that people respond using the online questionnaire form that was provided, which most respondents did. The questionnaire was also made available in paper form for those who required it, for example if they didn’t have internet access. There were some concerns raised about using the internet and saving responses, overall, however, technical problems in the software or set-ups appeared limited. In total, therefore, there were 702 respondents to the consultation, of which the consultation software has 598 logged responses. Further details of the consultation process are available at [2a. Consultation feedback report Ver 03.pdf and details of the representations are at Issues and Options - Jan to Mar 2021 - Representations on the Issues and Options consultation - East Devon](#) .
- 3.14 Alongside the Issues and Options consultation we also ran a Call for Sites (as part of a Housing and Employment Land Availability Assessment) which allowed people to identify land that they consider suitable for development. This was open to anyone with an interest in land and was publicised online and in through press releases. These sites were sifted against a methodology and suitable sites progressed to more detailed, technical assessment. The most appropriate sites were identified by Officers, most were also appraised by a panel of industry experts, and then progressed to the next stages of local plan consultation. See the HELAA and

appendices [Evidence Base and Supporting Documents - Spatial Strategy, Housing and Economy - East Devon](#). We also ran a Sustainability Appraisal scoping report consultation, to ensure that potential social, environmental and economic considerations are taken into account. [Microsoft Word - Draft SA Scoping Report East Devon Local Plan Ver 02](#)

- 3.15 **Stage 2 Consultation on the Draft Local Plan** - The draft plan was prepared to reflect the shape, form and content of what could be a reasonable plan for submission for examination by a planning inspector, although there were some gaps in policy coverage (these were addressed at Stage 3). All matters in the plan were consulted on to promote comment and review.
- 3.16 The plan was produced as a printed document in pdf format [Draft Local Plan](#) along with pdfs of various maps (the Policies map) showing lines, boundaries and areas that policies apply to. To encourage engagement and feedback we also published the plan (most policies in full and summary commentary around policies) on a consultation software platform called Commonplace . [Commonplace Consultation web site](#) . This software also had a mapping function that showed potential development sites that we sought feedback on as well. The previous consultation, undertaken in 2021 on 'Issues and Options' was conducted online using ESRI StoryMaps (as a more user-friendly alternative to a standard PDF). This presented the information being consulted on and Granicus Firmstep was used to collect responses submitted online. Members were in favour of a more unified system for the consultation on the Draft Local Plan, which didn't involve switching between platforms to view information and then comment on it separately.
- 3.17 Responses to Stage 1 were monitored so that consultation techniques at Draft Local Plan consultation stage could target under represented groups and those who were otherwise hard to reach. The overwhelming majority of respondents to the Issues and Options questionnaire were either in the 56-70 or 70+ age groups, and members advocated that more effort should be made to specifically seek the views of younger residents in the consultation on a draft version of the plan itself. Many of the topics covered in the Draft Local Plan affect the district's younger residents, specifically including future housing provision and the lack of affordable homes. Throughout the consultation, we utilised the Council's social media accounts to better engage with the younger demographic, including regular posts on Facebook and Twitter and the creation of topic-specific videos for YouTube. Members of the Devon Youth Council and East Devon representatives in the UK Youth Parliament were contacted to help publicise the consultation.
- 3.18 Additionally, online newsletters/updates were published throughout the consultation period, along with regular press releases being issued to the local media, adverts on the EDDC web site and online webinars for parish and town councillors. There were, face-to-face engagement events with the public, held in Whimple, Ottery St Mary, Axminster, Clyst St Mary, Sidmouth, Honiton, Exmouth, Feniton and Seaton. Some parish council and local community groups also organised their own events, such as a paper-based questionnaire organised by the Axminster

Neighbourhood Plan Steering Group. A group proposing a new garden village at Greenhayes organised a separate online petition.

- 3.19 Comments from around 2,500 people and organisations were submitted through online channels and around 1,000 through letters and emails, there were also some petition received. Where people or organisations made contact via the Commonplace consultation portal their comments can be seen on the software platform at [Commonplace](#) . The responses that came in, outside of Commonplace, i.e. that were sent in as emails or as paper copies or letters or petitions in the post and in respect of documents that were uploaded on to Commonplace (as opposed to be posted directly on the portal) can be viewed at [Comments made during the Draft Local Plan Consultation and Feedback Report - East Devon](#).
- 3.20 The consultation on the [Sustainability Appraisal \(SA\) report](#) , which accompanied the Draft Local Plan, was undertaken alongside consultation on the plan. The Sustainability Appraisal report assesses the policies and sites in the Draft Local Plan against a series of key environmental, social and economic objectives and assesses alternative policies and sites, where reasonable, and explains why the preferred policies and sites have been chosen over the alternatives.
- 3.21 **Stage 3 Further consultation on the Draft Local Plan** - was also at the Regulation 18 stage and ran from 16 May 2024 until 27 June on 8 specific topic areas which were not fully addressed in the original (Regulation 18 Draft Plan) consultation:
- New Housing and Mixed Use Site Allocations
 - New Employment Site Allocations
 - Designated Neighbourhood Area Housing Requirements
 - Clyst Valley Regional Park
 - Town Centre Retail Areas
 - Coastal Preservation Area
 - Green Wedges
 - Sustainability Appraisal
- 3.22 The consultation was hosted on Commonplace (the Council's chosen citizen engagement platform) but people could also comment by sending in emails and letters. An accessible PDF version incorporating the contents of the Commonplace site was made available upon request. We received comments from 1,284 people and organisations through Commonplace channels and 234 letters / emails.
- 3.23 Where people or organisations made contact via the Commonplace consultation portal their comments can be seen on the software platform at <https://eastdevonlocalplanspring24.commonplace.is> The responses that came in, outside of Commonplace, i.e. that were sent in as emails or as paper copies or letters or petitions in the post and in respect of documents that

were uploaded on to Commonplace (as opposed to be posted directly on the portal) can be viewed at: <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/further-draft-local-plan-consultation/> Responses from the consultation have been considered by officers in the redrafting of the plan for the publication stage, and relevant responses have been included within the committee reports provided to Councillors on policies and sites.

Main issues raised in feedback received

- 3.24 A series of audit trail reports (see reference in Schedule 2 of this report) have been produced to support, sit behind and help explain the content of and evolution of the chapters making up the Publication draft of the East Devon Local Plan. These papers have evolved as plan making has progressed and may continue to do so into and through plan Examination. They form an overarching audit trail of plan making work and set out summary information on representations made at each stage of consultation and the Councils response.

Stage 1 Consultation on the issues

- 3.25 A full list of all of the responses received to the issues consultation is available at [Issues and Options - Jan to Mar 2021 - Representations on the Issues and Options consultation - East Devon](#). A summary of responses is provided in the feedback report [2a. Consultation feedback report Ver 03.pdf](#).

Stage 2 Consultation on the Draft Local Plan

- 3.26 All responses received to the Draft Local Plan consultation are set out at [Comments made during the Draft Local Plan Consultation and Feedback Report - East Devon](#). The [accessible-reg-18-consultation-feedback-report-spring-2023.pdf](#) provides a policy by policy summary commentary of key matters raised by respondents to the consultation. Most comments are not attributed to specific individuals or organisations, however, exceptions are made where, for example it is a government agency or body or other organisation which undertakes or has specific roles defined in legislation or Government policy/guidance that address key planning matters. In selected other cases the report highlights where a body or organisation has made comment, especially on specific technical points, because it was felt to be beneficial for readers to know who has raised a given issue. Most comments made and reported on were submitted by individual members of the public.

Stage 3 Further consultation on the Draft Local Plan

- 3.27 All responses received to the further consultation on the draft Local Plan are set out at [Have Your Say Today - East Devon Local Plan Further Consultation - Commonplace](#) if they were submitted through the consultation software, or at [Offline Submissions](#) if they were received by email or post. A summary of all responses is available in the [report of feedback received](#). This report summarises responses but does not seek to respond to the points raised. For comments received through the Commonplace engagement software

summaries were produced with the use of the AI (Artificial Intelligence), Claude. In addition, to the Commonplace submissions a significant number of responses were received by email and letter. Key points from these ‘offline’ submissions were added to and reflected in the summaries in the report but the “number of responses” referred to at the start of each question only refers to those received on commonplace. It was considered to not be efficient use of resources to add all the responses received offline into commonplace.

Conclusion

- 3.28 The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the approach set out in the Council’s Statement of Community Involvement 2021. Links have also been provided to summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18, which includes an explanation of how these were taken into account in the preparation of the East Devon Local Plan Publication Draft. Further detail is provided in Schedules 1 and 2 of this Appendix. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

Schedule 1 – Bodies and persons consulted

The Council maintains a planning policy database of all individual persons and organisations who have expressed an interest to be kept informed of consultations by the Council on planning policy documents. The database is kept live and added to, or details deleted, over time.

Persons and organisations on the database are notified of each of the consultations by email, or where not available and an address is provided by letter. As a matter of standard routine we specifically notify for all consultations:

- All parish Council's in East Devon.
- All neighbouring local authorities.
- All defined statutory bodies required to be notified as specified in regulations.

On the council Granicus Newsletter system, that is operated by the Council, we have 3,809 people (at the time of preparing this report - January 2025) that are registered and we will contact in respect of local plan consultations. People employed in organisations interested in the local plan may register, but the vast majority of those listed will be members of the public.

For our database of contacts we have categorised organisations by the nature of the activities they are primarily involved in. Most of these will have been on our systems from the Issues and Options consultation (and from before then) though new organisations are added and records amended on an ongoing basis.

Based on the categorisation system we use, noting that it is an officer at the council interpretation of key activities a body may undertake, and many bodies have overlaps of activities and responsibilities we currently have recorded.

Consultee group	Commentary
Parish Council's in neighbouring local authority areas	There are 24 Parish Councils that abut East Devon in neighbouring local planning authority areas. We contact all of these.
Community Groups	We have loosely grouped bodies and organisation (not falling into any categories below) under a community group category, these include such bodies and chambers of trade, community action groups, campaigning groups, heritage organisations and others. Our system records 131 of these.
Developers/agents	this is the largest group on are system and it records companies and organisations that undertake development and/or agents that act for them. Our system currently has 351 separate entries.
Educations providers	We have 10 entries in this category.

Consultee group	Commentary
Environment groups	We have separated Environment groups from the broader Community Group category, given the significance of these sector. There are 21 groups listed.
Government organisations, agencies and public bodies	We have grouped together all public bodies of which (discounting any Parish Councils) we have 53, including local authorities, libraries, Government departments and other public sector bodies.
Housing associations / Registered social landlords	We have 12 listed providers plus the umbrella 'South West HA Consortium' body.
Medical/health providers	We have 7 listings including NHS Devon, Plymouth and Torbay and NHS East Devon Clinical Commissioning Group.
Private companies	We have sought to separate private companies for agents/developers, though there will potentially be some overlap. Our records show 38 recorded.
Utilities and transport	We have 17 entries in this category

In our categorisation system we have sought to avoid overlapping of numbers across categories. The above will be notified of for the Regulation 19 consultation.

In feedback elsewhere in this report (specifically including Schedule 2) we report on numbers of comments made and highlight, in specified cases, particular bodies or types of bodies that have responded and specific matter raised. On a general level it is noted that at all stages of plan consultation most response have come from members of the public. Scales and levels of development, being too high, and particular sites proposed for or being potential allocations for development have majored in concerns raised. There have, however, also been high levels of representation from developers and agents promoting development and sites. With other categories of respondents also actively responding.

Schedule 2 – How representations have informed the Regulation 19 plan

The schedule below sets out a summary of key changes to the Local Plan between Regulation 18 Draft Plan (November 2022) and Regulation 19 Proposed Submission Version (February 2025). In the schedule we highlight:

- 1st column – the chapter/policy title in the Regulation 18 draft of the plan;
- 2nd column – the equivalent chapter/policy in the Regulation 19 Publication plan;
- 3rd column – a commentary on any overarching significant changes – majoring on form/structure of changes as opposed to wording/requirement details.

It should be noted that for each plan policy we highlight if the policy is applicable to and in what form in the Cranbrook Plan area (through a Chapter 5 we just make a single reference at the beginning of the chapter as no policies are relevant).

Audit trail of comments made at Regulation 18 and how these have informed the Regulation 19 plan

Forming part of this consultation statement, and to be read alongside this document, are a series of chapter-based audit trail documents, one for each chapter of the plan, that set out summary details of comments made during Regulation 18 public consultation and how we have responded in respect of the Regulation 19 local plan.

These documents form an audit trail (the story) of how each chapter and each policy of the local plan has evolved over time. It should be noted that earlier drafts, Version 1, of these documents were considered by Strategic Planning Committee of the Council in 2024. The intent was and is that they would be added to and amended over time. In revised form, Version 2, these documents form part of this consultation statement.

The documents, in chapter order, are at [Evidence and Examination Library - Other Evidence \(OTE\) - East Devon](#)

These documents are referenced OTE-003 through to OTE-017.

It is stressed that in the linked documents we do not seek to respond to every comment that has been made. Rather, in providing feedback, we seek to identify key themes (specifically of relevance to planning policy) that have emerged and concentrate on providing summary feedback relevant to these. Also they have been written as the Publication local plan has evolved and decisions on plan content taken at committee. We have sought to make sure they are up to date, and reflect the plan order, policy content, policy numbering and other elements of the plan as at Publication date. However, there may be discrepancies where circumstances and matters and

plan content has changed and papers have not ‘caught-up’. In all instances the Publication version of the local plan is the definitive plan.

In the table below and/or in the audit trail documents we highlight significant cases where changes are made to the plan in response to:

- Changes to the NPPF and ongoing updates to national Planning Practice Guidance; and changes to CIL Regulation.
- General factual updates.

In some cases new policies, not in the Regulation 18 plan, have been added to the plan at Regulation 19 stage. As these are not necessarily addressed in earlier feedback work a fuller level of commentary is provided in respect to the new additions. It should also be noted that some policies in the Regulation 18 plan have not been carried forward into the Regulation 19 plan, summary explanation is provided.

Table of changes from the draft Reg 18 plan to the Reg 19 plan

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Chapter 1	Chapter 1. Introduction	There are no substantive changes to the introduction chapter of the local plan.
Chapter 2	Chapter 2. The Vision	The vision set out in the plan has been subject to substantial rewording. There were representations received saying that it previously did not say much and was not very location/East Devon specific. These matters have now been addressed through revision.
Chapter 3 – The Spatial Strategy	Chapter 3. The Spatial Strategy	This chapter of the plan remains largely as featured in the Regulation 18 plan.
1. Strategic Policy – Spatial Strategy	Strategic Policy SP01: Spatial strategy	This policy is slightly expanded on from that in the draft plan though it sets out the same basic hierarchy.
2. Strategic Policy – Housing distribution	<i>Policy not in Reg 19 plan</i>	In the draft plan we had a policy setting out housing numbers, from all sources. However, this is/was not a policy that would inform decision making and it addresses numbers contained in policy elsewhere in the plan detailed from other source documents. Policy does not feature in the Reg 19 plan.
3. Strategic Policy - Levels of future housing development	Strategic Policy SP02: Levels of	In the Reg 19 plan the policy has been greatly simplified from the version in the Reg 18 plan, noting that many matters in the draft plan policy are covered in much more detail elsewhere in the plan. In redrafted

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
	future housing development	format the policy addresses overall housing numbers and delivery matters.
Formed part of Policy 3 above.	Strategic Policy SP03: Housing requirement by Designated Neighbourhood Area	There was not a standalone policy on Housing requirement by Designated Neighbourhood Area in the draft plan so this policy is new. However, in the Reg 18 plan Designated Neighbourhood Area housing numbers were referenced through Policy 3.
4. Strategic Policy - Employment Provision and Distribution Strategy	Strategic Policy SP04: Employment provision and distribution strategy	In the Reg 19 plan this policy addresses the same key themes, plus sets out data on sources of employment land supply.
5. Strategic Policy – Mixed use developments incorporating housing, employment and community facilities	<i>Policy not in Reg 19 plan</i>	In the Reg 18 plan we had a policy seeking mixed housing and employment provision on site allocations for 25 dwellings or over. This policy is dropped from the Reg 19 plan though note that some site allocations specify mixed housing/employment provision.
6. Strategic Policy – Development inside Settlement Boundaries	Strategic Policy SP05: Development inside Settlement Boundaries	Policy sees limited changes; it retains an emphasis on accommodating development inside boundaries.
7. Strategic policy - Development beyond Settlement Boundaries	Strategic Policy SP06: Development beyond Settlement Boundaries	Policy sees limited changes. Policy places constraints on development outside of boundaries.
There was no specific standalone policy on this matter in the draft plan.	Strategic Policy SP07: Delivery of infrastructure	This policy is new in the Reg 19 plan though it addresses important points of infrastructure delivery that were highlighted in policies elsewhere in the plan and that came up in comments received.
There was no specific standalone policy on this matter in the draft plan.	Strategic Policy SP08: Phased Delivery of Infrastructure and Services	This policy is new in the Reg 19 plan though it addresses important points of infrastructure delivery that were highlighted in policies elsewhere in the plan and that came up in comments received.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Chapter 4 in the draft plan was in respect to site assessment work.	<i>Chapter not replicated in Reg 19 plan.</i>	Chapter 4 in the draft plan was in respect to site assessment work – it was about process matters rather than containing actual policy for the plan so would be inappropriate to incorporate in the Reg 19 plan.
Chapter 5. Future growth and development on the western side of East Devon	Chapter 4. Development at the West End	This chapter of the plan is specifically concerned with development at the West End of the district. In the Reg 19 plan the chapter contains more policy detail, particularly so in respect of bespoke policies allocating sites for development.
Strategic Policy 8 – Development of a second new town east of Exeter	Strategic Policy WS01: Development of a second new community east of Exeter	In the Reg 19 plan the policy wording is considerably extended, covering more subject matters, from that in the Reg 18 plan though it retains the same basic structure. It is highlighted that the policy is supported by a new community vision in the supporting text and the policy now references the new community extending to accommodate at least 10,000 new homes in the longer term.
Strategic Policy 9 – Development within the Enterprise Zone	Strategic Policy WS02: Development within the Enterprise Zone	This policy appeared in the draft Reg 18 plan and in the Reg 19 plan appears in simpler form.
Strategic Policy 10 – Exeter and East Devon Science Park	Strategic Policy WS03: Exeter Science Park	This policy appeared in the draft plan and is essentially the same in the Reg 19 plan.
Strategic Policy 11 – Land north of the Science Park	Strategic Policy WS04: Land north of the Science Park (Brcl_23)	This policy appeared in the draft plan but has been amended to allocate a mix of employment and housing uses in the Reg 19 plan.
Strategic Policy 12 – High quality employment north of Sowton village		This policy appeared in the draft plan but the policy is not included in the Regulation 19 plan, the site is not now allocated for development.
Strategic Policy 13 – Exeter Airport and its future operation and development	Strategic Policy WS05: Exeter Airport and its future operation and development	This policy has been refined in the Reg 19 plan from that in the Reg 18 plan, but is not amended to any extent.
Strategic Policy 14 – Employment land to	Strategic Policy WS06:	Strategic Policy 14 in the draft plan – Employment land to the east of airport buildings is now combined with

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
the east of airport buildings	Employment land east of airport	Strategic Policy 15 to create: Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a)
New policy not in the draft Regulation 18 plan.	Strategic Policy WS07: Employment land north of the airport, adjoining Treasbeare	This new Reg 19 policy allocates land for a range of employment uses.
New policy not in the draft Regulation 18 plan.	Strategic Policy WS08: Employment land opposite airport buildings, south of A30	This new Reg 19 policy allocates land for a range of employment uses.
Strategic Policy 16 – Green infrastructure and the Clyst Valley Regional Park	Strategic Policy WS09: Clyst Valley Regional Park	The draft plan policy is split in half with the part relevant to the Clyst Valley Regional Park retained in this chapter. A new policy further in the plan is included in respect of Green (and Blue) infrastructure.
Strategic Policy 17 – Development next to the M5 and north of Topsham	Strategic Policy WS10: Development next to the M5 and north of Topsham	This policy in the Reg 19 plan is a refinement of that in the Reg 18 plan and very importantly now includes reference to joint working with Exeter City Council on a joint Development and Infrastructure Delivery Framework.
Strategic Policy 18 – Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line	Strategic Policy WS11: Gypsy and traveller site east of M5	This policy allocates a site for at least 5 pitches specifically for Gypsy and Traveller use. It remains substantive unchanged from Reg 18 to Reg 19 plans.
New policy not in the draft plan	Strategic Policy WS12: Employment land at Sandygate, between M5 and Clyst Road	This policy allocates land for a range of employment uses. It is a new policy for Reg 19.
New policy not in the draft plan	Strategic Policy WS13: Employment land at Lodge Trading Estate, Broadclyst	This policy allocates land for a range of employment uses. It is a new policy for Reg 19.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
New policy not in the draft plan	Strategic Policy WS14: Employment land south of Langdon’s Business Park, Clyst St Mary	This policy allocates land for a range of employment uses. It is a new policy for Reg 19. It is a new policy for Reg 19.
New policy not in the draft plan	Strategic Policy WS15: Employment land at Darts Farm	This policy allocates land for a range of employment uses. It is a new policy for Reg 19.
Chapter 6. Strategy for development at Principal Centres, Main Centres, Local Centres and Service Villages	Chapter 5. Development in the Towns and Villages	This chapter, in the Reg 19 plan covers the same in principle matters, the allocation of sites for development, that were addressed in the corresponding Reg 18 plan chapter.
20. Strategic Policy – Exmouth and its future development	Strategic Policy SD01: Exmouth and its development allocations	Whilst some site allocations have changed from the Reg 18 to the Reg 19 plan, and at Reg 19 more policy detail and requirements are included, the role of policy has not changed.
19. Strategic Policy – Axminster and its future development	Strategic Policy SD02: Axminster and its development allocations	Whilst some site allocations have changed from the Reg 18 to the Reg 19 plan, and at Reg 19 more policy detail and requirements are included, the role of policy has not changed.
21. Strategic Policy – Honiton and its future development	Strategic Policy SD03: Honiton and its development allocations	Whilst some site allocations have changed from the Reg 18 to the Reg 19 plan, and at Reg 19 more policy detail and requirements are included, the role of policy has not changed.
22. Strategic Policy – Ottery St Mary and its future development	Strategic Policy SD04: Ottery St Mary and its development allocations	Whilst some site allocations have changed from the Reg 18 to the Reg 19 plan, and at Reg 19 more policy detail and requirements are included, the role of policy has not changed.
23. Strategic Policy – Seaton and its future development	Strategic Policy SD05: Seaton and its development allocations	Whilst some site allocations have changed from the Reg 18 to the Reg 19 plan, and at Reg 19 more policy detail and requirements are included, the role of policy has not changed.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
24. Strategic Policy – Sidmouth and its future development	Strategic Policy SD06: Sidmouth and its development allocations	Whilst some site allocations have changed from the Reg 18 to the Reg 19 plan, and at Reg 19 more policy detail and requirements are included, the role of policy has not changed.
25. Strategic Policy – Development at Local Centres	Strategic Policy SD07: Development allocations at Broadclyst	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 3 local centres. In plan Revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
25. Strategic Policy – Development at Local Centres	Strategic Policy SD08: Development allocations at Budleigh Salterton	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 3 local centres. In plan Revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
25. Strategic Policy – Development at Local Centres	Strategic Policy SD09: Development allocations at Colyton	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 3 local centres. In plan Revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
25. Strategic Policy – Development at Local Centres	Strategic Policy SD10: Development allocations at Lypstone	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 3 local centres. In plan Revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
25. Strategic Policy – Development at Local Centres	Strategic Policy SD11: Development allocations at Woodbury	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 3 local centres. In plan Revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD12: Development allocation at Broadhembury	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
26. Strategic Policy – Development at service villages	Strategic Policy SD13: Development allocation at Chardstock	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD14: Development (Neighbourhood Plan led) at Clyst St Mary	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD15: Development allocation at Dunkeswell	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD16: Development allocation at East Budleigh	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD17: Development allocations at Exton	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD18: Development allocations at Feniton	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD19: Development allocation at Hawkchurch	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
26. Strategic Policy – Development at service villages	Strategic Policy SD20: Development allocations at Kilmington	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD21: Development allocation at Musbury	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD22: Development allocations at Newton Poppleford	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD23: Development allocation at Otterton	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD24: Development allocation at Payhembury	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD25: Development allocation at Plymtree	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD26: Development allocation at Sidbury	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD27: Development	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
	allocation at Tipton St John	been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy SD28: Development allocations at West Hill	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
26. Strategic Policy – Development at service villages	Strategic Policy: SD29: Development allocations at Whimble	In the Reg 18 plan there was a single policy covering the allocation of land for all of the Tier 4 service villages. In plan revision for Regulation 19 each of these settlements has been given its own policy that allocates land for development providing more detailed requirements for sites and allocation changes.
Chapter 7. Tackling the climate emergency and responding to climate change	Chapter 6. Mitigating Climate Change	Chapter 7 in the Regulation 18 plan addressed both of the subject areas of a) tackling the climate emergency and b) responding to climate change. In the Regulation 19 plan the subject matters have been split into separate chapters, now forming Chapter 6 of the plan (that policies below refer to) - Mitigating Climate Change
Strategic Policy 27 – Climate Emergency	Strategic Policy CC01: Climate emergency	In the Regulation 19 draft of the plan this policy is a refinement to that of the Reg 18 plan.
Strategic Policy 28 – Net Zero Carbon Development	Strategic Policy CC02: Net-zero carbon development	In the Regulation 19 draft of the plan this policy has been refined to be more overarching and strategic in nature.
Strategic Policy 29 – Promoting renewables and zero carbon energy; and Strategic Policy 30 – Suitable areas for solar energy developments; and Strategic Policy 31 – Suitable areas for wind energy developments	Strategic Policy CC03: Promoting low carbon and renewable energy	Three policies in the Regulation 18 plan have been combined into one policy in the publication plan. Policy test that previously existed have been refined, and simplified, and locations for solar energy schemes are no longer depicted on the Policies Map, rather a straight criteria based policy approach now applies.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Strategic Policy 32 – Energy Storage	Strategic Policy CC04: Energy storage	Policy in the Reg 19 is a minor reworking of that in the Reg 18 plan.
Strategic Policy 33 – Heat Networks	Strategic Policy CC05: Heat networks	Policy in the Reg 19 is a refinement of that in the Reg 18 plan.
Strategic Policy 34 – Embodied Carbon	Strategic Policy CC06: Embodied carbon	Policy in the Reg 19 is a refinement of that in the Reg 18 plan.
Chapter 7. Tackling the climate emergency and responding to climate change	Chapter 7. Adapting to Climate Change	Chapter 7 in the Reg 19 plan is based on those policies that were in Chapter 7 of the Reg 18 plan that were specifically concerned with ‘responding to climate change’.
Strategic Policy 35 – Flooding	Strategic Policy AR01: Flooding	This policy has been reworked and extended from Reg 18 coverage to Reg 19 coverage.
Paragraph 7.35 in the draft plan - Water quality and supply and proposed Water Efficiency Policy	Strategic Policy AR02: Water efficiency	This was text reference in the draft Reg 18 plan that has been formed into Policy in the Reg 19 plan.
Strategic Policy 36 – Coastal change management areas (CCMAs)	Policy AR03: Coastal Change Management Areas (CCMAs)	This is a reworking and restructuring of policy from the Reg 18 plan to the Reg 19 plan.
Strategic Policy AR37 – Relocation of users affected by coastal change	Policy AR04: Relocation of uses affected by coastal change	This is a reworking of policy from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 38 – Development affecting coastal erosion	Policy AR05: Development affecting coastal erosion	This is a reworking of policy from the Reg 18 plan to the Reg 19 plan.
Chapter 8. Meeting Housing Needs for all	Chapter 8. Meeting Housing Needs	Chapter 8 of the plan has been shortened and simplified in the Reg 19 plan from the text and policy that appeared in the Reg 18 draft.
Strategic Policy 39 – Housing to Address Needs	Strategic Policy HN01: Housing to address needs	This is a reworking of policy from the Reg 18 plan to the Reg 19 plan.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Strategic Policy 40 – Affordable Housing	Strategic Policy HN02: Affordable housing	This is a reworking and simplification of policy from the Reg 18 plan to the Reg 19 plan, with thresholds included based on viability assessment.
Strategic Policy 41 – Housing to Meet the Needs of Older People	Policy HN03: Housing to meet the needs of older people	This is a reworking and simplification of policy from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 42 – Accessible and Adaptable Housing	Policy HN04: Accessible and adaptable Housing	This is a reworking and refinement of policy from the Reg 18 plan to the Reg 19 plan
Strategic Policy 43 – Market Housing Mix	Policy not included/replicated in the Reg 19 plan	This policy in the draft plan sought, primarily, to specify the mix of property sizes to be accommodated on development sites. It has not however been carried forward in the Regulation 19 plan.
Strategic Policy 44 – Self Build and Custom Housing	Policy HN05: Self-build and custom build housing	This is a reworking and simplification of policy from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 45 – Residential Subdivision of Existing Dwellings and Buildings and Replacement of Existing Dwellings	Policy HN06: Subdividing or replacing existing buildings and dwellings	This is a reworking and simplification of policy from the Reg 18 plan to the Reg 19 plan and includes clarification of where relevant parts of policy will apply.
Strategic Policy 46 – Householder Annexes, Extensions, Alterations and Outbuildings	Policy HN07: Householder annexes, extensions, alterations or outbuildings outside settlement boundaries	This is a reworking of policy from the Reg 18 plan to the Reg 19 plan to provide greater clarity around use and application of policy.
Strategic Policy 47 – Hostels and Houses in Multiple Occupation (HMOs)	Policy HN08: Hostels and houses in multiple occupation (HMOs)	This is a reworking and simplification of policy from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 48 – Provision for Gypsy and Travellers, and	Policy HN09: Gypsy and traveller sites	This policy was in the draft plan. It has been updated and reined to reflect the findings (particularly pitch

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Travelling Showpeople Sites		numbers) of the Gypsy and Traveller Accommodation Needs Assessment (2024)
Strategic Policy 49 – Rural Exception Sites and First Homes Exception Sites	Strategic Policy HN10: Rural housing exception sites	This is a reworking and simplification of policy from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 50 - Housing for Rural Workers	Policy HN11: Housing for rural workers	This is a reworking of policy from the Reg 18 plan to the Reg 19 plan.
Chapter 9. Supporting Jobs and the Economy and Vibrant Town Centres	Chapter 9. Supporting the Economy and Town Centres	This chapter in the Reg 19 plan covers the same key areas as the corresponding chapter 9 in the Reg 18 plan.
Strategic Policy 51 – Employment Development Within Settlement Boundaries	Policy SE01: Employment development within settlement boundaries	Policy in the Reg 19 plan covers the same themes that the Reg 18 policy addressed.
Strategic Policy 52 – Employment Development in the Countryside	Policy SE02: Employment development in the countryside	Policy in the Reg 19 plan covers the same themes that the Reg 18 policy addressed, though is more succinct.
Strategic Policy 53 – Farm Diversification	Policy SE03: Farm diversification	Policy in the Reg 19 plan covers the same themes that the Reg 18 policy addressed, though has sought to simplify wording.
Strategic Policy 54 – Resisting the Loss of Employment Sites	Strategic Policy SE04: Resisting the loss of employment sites	Policy in the Reg 19 plan covers the same themes that the Reg 18 policy addressed.
Strategic Policy 55 – Employment and Skills Statements	Policy SE05: Employment and Skills Statements	This policy, from Reg 18 to Reg 19, has been refined and thresholds and further detail have been added.
Strategic Policy 56 – Town Centre Hierarchy, Sequential Approach and Impact Assessment	Strategic Policy SE06: Town centre hierarchy	Part of this policy, as appeared in the Reg 18 draft plan, is now addressed in the subsequent plan policy, below. The remaining part, redrafted for Reg 19, specifically addresses town centre hierarchy matters.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Strategic Policy 57 – Town Centre Development	Policy SE07: Town centre development, sequential approach and impact assessment	In the Reg 19 plan policy has been redrafted to focus on the major themes of: town centre development, sequential approach and impact assessment.
Strategic Policy 58 – Local Shops and Services	Policy SE08: Local shops and services	Policy in the Reg 19 plan covers the same themes that the Reg 18 policy addressed.
Strategic Policy 59 – Rural Shops	Policy SE09: Rural shops outside of towns and villages	This policy, from Reg 18 to Reg 19, has been amended and thresholds and further detail have been added.
Strategic Policy 60 – Sustainable Tourism	Policy SE10: Sustainable tourism	This policy, from Reg 18 to Reg 19, has been amended to clarify use and application, specifically in res[poect of proposals inside and those outside of settlement boundaries.
Strategic Policy 61 – Holiday Accommodation Parks in Designated Landscapes	Policy SE11: Holiday accommodation parks in designated landscapes	This policy, from Reg 18 to Reg 19, has been refined but not substantively changed.
Chapter 10. Designing beautiful and healthy spaces and buildings	Chapter 10. High Quality Design	This chapter is retained from the Reg 18 plan to the Reg 19 plan without substantive changes though with a new green and blue infrastructure policy.
Strategic Policy 62 – Design and Local Distinctiveness	Strategic Policy DS01: Design and local distinctiveness	This policy, from the Reg 18 to the Reg 19 draft, has been refined but nit substantively changed.
Strategic Policy 63 – Housing Density and Efficient Use of Land	Policy DS02: Housing density and efficient use of land	This policy, from the Reg 18 to the Reg 19 draft, has been slightly simplified.
Strategic Policy 64 – Display of Advertisements	Policy DS03: Display of advertisements	This policy, from the Reg 18 to the Reg 19 draft, has been carried forward as initially drafted.
Policy not in the draft plan	Policy DS04: Green and blue Infrastructure	This is a new policy for this chapter of the plan. It is a reworking of part of a policy that featured in the west end chapter. The reworking leaves Clyst Valley

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
		Regional Park considerations in the west End chapter and moves green and blue infrastructure matters, as reworked, to this chapter.
Chapter 11. Prioritising Sustainable travel and providing the transport and communications facilities we need	Chapter 11. Sustainable Transport and Communications	This chapter in the Reg 19 plan addresses the same basic matters as addressed in the Regulation 18 draft.
Strategic Policy 65 – walking, cycling and public transport	Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport	This policy in the Reg 19 plan covers similar matters, though in restructured form, as that in the Reg 18 plan.
Policy 66 – Protecting transport sites and routes	Strategic Policy TR02: Protecting transport sites and routes	This policy, as redrafted, sets out more information on aspirations and expectations for new routes and sites.
Policy 67 – Travel Plans, Transport Statements, Transport Assessments	Policy TR03: Travel plans, transport statements and transport assessments	This is a simplification of the Reg 18 policy wording.
Policy 68 – Parking Standards	Policy TR04: Parking standards	Through redrafting this Reg 19 policy now sets out quantified parking standards for differing uses.
Policy 69 – Rear Servicing of Shopping/Commercial Development	Policy not in the Reg 19 plan	This policy featured in the draft plan but was not replicated in the Regulation 19 plan. It deals with matters of detail that were not deemed to be of sufficient importance to warrant bespoke policy coverage.
Policy 70 – Safe vehicular access to sites	Policy not in the Reg 19 plan	This policy featured in the draft plan but was not replicated in the Regulation 19 plan. It repeats matters addressed in the NPPF.
Policy 71 – Aerodrome Safeguarded Areas and Public Safety Zones	Policy TR05: Aerodrome safeguarded areas and Public Safety Zones	This is a redrafting, with minor changes, from the Reg 18 plan to the Reg 19 plan.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Strategic Policy 72 – Digital Connectivity	Policy TR06: Digital connectivity	This is a redrafting, with minor changes, from the Reg 18 plan to the Reg 19 plan.
Policy 73 – Wireless connectivity and telecoms infrastructure	Policy TR07: Wireless connectivity and telecoms infrastructure	This is a redrafting, with minor changes, from the Reg 18 plan to the Reg 19 plan.
Chapter 12. Our outstanding landscape	Chapter 12. Our Outstanding Landscape	This chapter in the Reg 19 plan addresses the same basic matters as addressed in the Regulation 18 draft.
Strategic Policy 74 – Landscape Features	Strategic Policy OL01: Landscape features	This is a redrafting, with minor changes, from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 75 – Areas of Outstanding Natural Beauty	Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty)	This is a redrafting, with minor changes, from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 76 – Coastal Preservation Areas	Strategic Policy OL03: Coastal Preservation Areas	This policy is carried forward from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 77 – Areas of Strategic Visual Importance	Policy OL04: Areas of strategic visual importance	This policy is carried forward from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 78 – Green Wedges	Policy OL05: Green wedges	This policy in the Reg 19 plan is a simplification of that included in the Reg 18 plan.
Strategic Policy 79 – Land of Local Amenity Importance or Local Green Space	Policy OL06: Land of Local Amenity Importance and Local Green Space	This policy at Reg 19 is an amendment from the Reg 18 plan policy.
Strategic Policy 80 – Contaminated Land	Policy OL07: Contaminated land	This policy is carried forward from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 81 – Potentially Hazardous Developments Notifiable Installations	Policy OL08: Potentially hazardous developments and	This policy is carried forward from the Reg 18 plan to the Reg 19 plan.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
	notifiable installations	
Strategic Policy 82 – Control of Pollution	Policy OL09: Control of pollution	This policy is carried forward with minor amendment from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 83 – Development on High Quality Agricultural Land	Policy OL10: Development on high quality agricultural land	This policy is carried forward with amendment from the Reg 18 plan to the Reg 19 plan.
Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity	Chapter 13. Our Outstanding Biodiversity and Geodiversity	This chapter is carried forward from the Reg 18 plan to the Reg 19 plan with some policy simplifications.
Strategic Policy 84 – Protection of Internationally and Nationally Important Wildlife Sites	Strategic Policy PB01: Protection of internationally and nationally important wildlife sites	Policy 84 in the Reg 18 plan has been split into two with the first, PB01 addressing internationally and nationally important sites and the second, below, addressing regional and local sites. The internationally and nationally important sites component of the Reg 19 policy as a reworking of the comparable relevant part of the Reg 18 policy.
The matters in the Reg 19 policy, PB02, were as included in the above Policy 84.	Policy PB02: Protection of regionally and locally important wildlife sites	The Reg 19 policy wording is a redrafting of relevant parts for regional and local sites as featured in the Reg 18 policy 84.
Strategic Policy 85 – Protection of Irreplaceable Habitats and Important Features	Policy PB03: Protection of irreplaceable habitats and important features	This policy is carried forward from the Reg 18 plan to the Reg 19 plan though with more detail included.
Strategic Policy 86 – Habitats Regulation Assessment	Strategic Policy PB04: Habitats Regulations Assessment	This Reg 19 policy is redrafted to provide greater clarity of use/application than the Reg 18 equivalent.
Strategic Policy 87 – Biodiversity Net Gain	Strategic Policy PB05: Biodiversity Net Gain	With refinement this policy is carried forward from the Reg 18 plan to the Reg 19 plan.
Strategic Policy 88 – Local Nature Recovery Strategy	Strategic Policy PB06: Local Nature Recovery	This Reg 19 policy is a redraft of the Reg 18 policy to provide greater clarity of its application and use.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
and Nature Recovery Network	Strategy and Nature Recovery Network	
Strategic Policy 89 – Ecological Impact Assessment	Policy not replicated in the Regulation 19 local plan.	This policy was not carried forward from the Reg 18 plan to the Reg 19 plan as it addressed matters for which consideration will fall outside of the needs of local plan coverage.
Strategic Policy 90 – Due Consideration of Protected and Notable Species	Policy not replicated in the Regulation 19 local plan.	This policy was not carried forward from the Reg 18 plan to the Reg 19 plan as it addressed matters for which consideration will fall outside of the needs of local plan coverage.
Strategic Policy 91 – Ecological Enhancement and Incorporation of Design Features to Maximize the Biodiversity Value of Proposals	Policy PB07: Ecological enhancement and biodiversity in the built environment	This Reg 19 policy is a redraft of the Reg 18 policy to provide greater clarity of its application and use.
Strategic Policy 92 – Tree Policy	Policy PB08: Tree, hedges and woodland on development sites	This Reg 19 policy is a substantive redraft of the Reg 18 policy to give greater clarity.
Policy not included in the draft plan.	Policy PB09: Monitoring requirements for new planting schemes	This is a new policy in the Reg 19 plan centred on the importance of monitoring of tree planting schemes and their success.
Strategic Policy 93 – Protection and Enhancement of the Jurassic Coast World Heritage Site	Policy PB10: Protection and enhancement of the Jurassic Coast World Heritage Site	This Reg 19 policy is a redraft of the Reg 18 policy to give greater clarity.
Strategic Policy 94 – Protection of Designated Geological Sites	Policy PB11: Protection of designated geological sites	This Reg 19 policy is rolled forward from the Reg 18 plan.
Strategic Policy 95 – Regionally Important Geological and	Policy PB12: Regionally Important	This Reg 19 policy is rolled forward from the Reg 18 plan.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Geomorphological Sites	Geological and Geomorphological Sites	
Chapter 14. Open Space and Sports and Recreation Facilities	Chapter 14. Open Space and Sports and Recreation	This chapter at Reg 19 addressed corresponding matters addressed in the Reg 18 plan.
Strategic Policy 96 – Access to open space and recreation facilities	Strategic Policy OS01: Access to open space and recreation facilities	This Reg 19 policy is rolled forward from the Reg 18 plan.
Strategic Policy 97 – Land and buildings for sport, recreation, and open space areas in association with development	Policy OS02: Sport, recreation and open space provision in association with development	This Reg 19 plan policy is a amendment from the Reg 18 equivalent policy and specifically it applies Field in Trust standards.
Strategic Policy 98 – Location of facilities for sport and recreation, open spaces and allotments	Policy OS03: Location of facilities for sport and recreation and open	This Reg 19 policy is rolled forward from the Reg 18 plan.
Strategic Policy 99 – Retention of land and buildings for sport and recreation use	Policy not replicated in the Publication local-plan.	On the strength of concerns raised by Sport England this Reg 18 policy has not been carried forward into the Publication local plan. Sufficient weight is deemed to exist in NPPF coverage of the subject matter.
Strategic Policy 100 – New allotments and avoiding the loss of existing ones	Policy OS04: New allotments and avoiding the loss of existing ones	This Reg 19 policy is rolled forward from the Reg 18 plan.
Strategic Policy 101 – Leisure and recreation developments	Policy OS05: Leisure and recreation developments in the countryside	This Reg 19 policy is largely rolled forward from the Reg 18 plan.
Chapter 15. Our Outstanding Historic Environment	Chapter 15. Our Outstanding Historic Environment	This chapter at Reg 19 addressed corresponding matters addressed in the Reg 18 plan.

Chapter/policy in draft Reg 18 plan	Chapter/policy in the Reg 19 plan	Headline summary of plan changes from Regulation 18 to Regulation 19
Strategic Policy 102 – Historic Environment	Strategic Policy HE01: Historic environment	This Reg 19 plan policy is a simplification of that in the Reg 18 plan.
Strategic Policy 103 – Listed Buildings	Policy HE02: Listed buildings	This Reg 19 plan policy is a simplification of that in the Reg 18 plan.
Strategic Policy 104 – Conservation Areas	Policy HE03: Conservation Areas	This Reg 19 plan policy is a reworking of that in the Reg 18 plan.
Strategic Policy 105 – Archaeology and Scheduled Monuments	Policy HE04: Archaeology and Scheduled Monuments	This Reg 19 plan policy is carried forward from the Reg 18 plan.
Strategic Policy 106 – Historic landscapes, Parks and gardens	Policy HE05: Historic Landscapes, Parks and Gardens	This Reg 19 plan policy is carried forward from the Reg 18 plan.
Chapter 16. Ensuring we have community buildings and facilities	Chapter 16. Community Facilities	This chapter at Reg 19 addressed corresponding matters addressed in the Reg 18 plan.
Policy 107 – New or extended community facilities	Policy CF01: New or extended community facilities	This Reg 19 plan policy is carried forward with supportive amendments from the Reg 18 plan.
Policy 108 – Loss of community facilities	Policy CF02: Loss of community facilities	This Reg 19 plan policy is carried forward from the Reg 18 plan though with more policy detail included.
Chapter 17. Implementation and Monitoring	Chapter 17. Implementation and Monitoring Error! Bookmark not defined.	This chapter is a reworking of the equivalent Reg 18 chapter.