

East Devon Local Plan

Plan Introduction and Vision and Objectives

Audit trail local plan evolution document and consultation statement

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East Devon – an outstanding place

Version production of this paper

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1 Introduction

- 1.1 This is one of a series of audit papers that will sit behind and help explain the content of and evolution of the Publication draft of the East Devon Local Plan.
- 1.2 There may be new versions of this topic paper as plan making progresses to Publication and thereafter into and through plan Examination.
- 1.3 This paper specifically addresses the plan introduction and vision and objectives.

2 The Publication draft of the Local Plan

- 2.1 This report is a redraft of an earlier report and in revised form it is specifically concerned with supporting the local plan at the Regulation 19 stage of plan making work. There are specific Government regulations¹ that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).
- 2.2 The proposed Publication draft text of the local plan is an edited and amended draft of the consultation draft plan published in November 2022². The draft plan was consulted on under plan making Regulation 18 with further limited additional consultation under this regulation in the Spring of 2024.

3 Summary of redrafting of Chapters 1 and 2 of the consultation plan

- 3.1 Chapter 1 of the consultation draft local plan (November 2022) formed a brief introduction and provided a summary picture of East Devon. Chapter 2 of the plan set out a vision for East Devon and also a series of plan objectives.
- 3.2 In the consultation draft plan there was quite a lot of introductory text in Chapter 1 that was relevant to the consultation then being undertaken. In proposed plan amendments much of

¹ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

² [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf)

this text is not seen as needed for the Publication plan and as such has been either deleted or simplified.

- 3.3 Chapter 2 of the draft plan contained a short vision, taken from the then Council Plan, that was in place at the time. It should be noted that work started on a new Council plan in late 2023 and was completed in early 2024. Chapter 2 of the draft plan also included a series of objectives. In the Publication text the vision has been replaced by a more detailed and locally specific vision.

4 Issues and options consultation

- 4.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options³ report. This included a series of questions that responses and comments were invited on. A feedback report was published⁴.
- 4.2 In the issues and options report we did not include a plan vision but we did include a series of objectives (it should be noted that these were the same objectives that also featured in the consultation draft plan). Question 1 of the Issues and Options report asked for comment on these objectives. Over 64% of respondents responded by ticking a 'yes' box that they were the right objectives, just under 25% ticked 'no' and just under 11% were blank/no response.
- 4.3 In comment there were a number of matters of detail raised, some people questioned whether objectives should be in a priority order or weighted and some queried if they would be implemented in practice or indeed if they were actually objectives. Feedback on the objectives in the issues and options report highlighted the issues listed below suggesting they were not appropriately addressed.
- No specific reference to tourism
 - Traffic volumes and road safety, specifically for pedestrians
 - Planning for less crime
 - Addressing coastal erosion
 - Agricultural matters
 - Off grid living
 - More references needed to communities
 - Specific objectives around young people
 - Disability issues
 - More accommodating policy for self-builders

³ [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

⁴ [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

- The local community should be a priority
- More restrictions on development
- Creating safe and secure environments with low crime levels (resulting)
- Preserving the built heritage

- 4.4 By way of general comment many of the bullet pointed items above, although not addressed directly in the objectives do feature in policies in the Regulation 19 plan. Matters are, therefore, addressed in the plan.
- 4.5 The intent, in drafting, was not to seek to weight or prioritise any revised objectives. The plan will need to read and used as a whole and plan policies specifically should be considered on this basis. In some cases, however, some specific polices may set out demanding or potentially absolute standards (potentially in comparison to some that are less explicitly demanding) and as such there is a degree of policy weighting that will exist.
- 4.6 With respect to ‘Of grid living’ the plan does not prevent this choice of living and therefore associated development, though we would highlight that we have not sought to go down a One Planet Wales⁵ policy approach. This Welsh policy approach, noting that is has informed policies in some English local plans, has resulted in very few successfully implemented developments schemes in Wales. It is not seen as an appropriate policy approach for the East Devon plan, noting the very limited (or nil) proposals likely to come forward, this is especially so given the very demanding policy tests that that are set out in Wales. Any relevant planning applications that are submitted could be assessed under other plan policies or as departures from plan and determined drawing on other material considerations.

5 Draft plan consultation

- 5.1 In the draft plan consultation Chapter 1 formed an introduction that also advised on matters of evidence and the structure of plan policies. Chapter 2 contained a vision and objectives. There is a feedback report on the draft plan consultation⁶.

Comments and response - Chapter 1 - Introduction

- 5.2 The draft plan consultation feedback report, in respect of the introductory Chapter 1 of the plan, reports on the following matters being raised in respect of commentary around evidence.
- The Environment Agency note that the evidence base does not include the habitats and biodiversity referenced – this could include national and local evidence

⁵ [Microsoft Word - 4 - opd practice guide - final - for web publication - 17 10 12 - tcp.doc \(gov.wales\)](#)

⁶ [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](#)

including emerging nature recovery mapping and local nature recovery strategy for Devon, the River Axe SSSI River Restoration Plan and the report to Defra 'Making Space for Nature'.

- Natural England advise of additional documentation which could be added to the evidence base for the Local Plan include the Beer Quarry and Caves SAC Guidance, the Shoreline Management Plan, the Management Plans for East Devon and the Blackdowns AONBs and the South West River basin management plans: updated 2022 - GOV.UK (www.gov.uk)
- Exeter Cycling Campaign would like the evidence base to include the government's 'Gear Change' strategy. Nor is there mention of extant design standards for cycling infrastructure (LTN 1/20) or the 'Manual for Streets' design guidance. These are standards that should be mandated as part of the Local Plan. Furthermore, the Devon Climate Emergency Response Group's Carbon Plan is not cited as evidence underpinning the Local Plan. This is a surprising omission. These standards and strategies should play a greater role in shaping the East Devon Local Plan so that the vision of tackling climate change and promoting sustainable transport are deliverable.

5.3 In respect of evidence we have cited in the plan that which we see as relevant to inform and justify local plan policies. This does not prevent other evidence and material being used and applicable in the determination of planning applications, but such evidence is not seen as needed to underpin plan policies.

Comments and response - Figure 1 – Key Facts

5.4 In respect of the key fact's graphic (Figure 1 in the draft plan) the following points were raised.

- The Environment Agency suggest that 'Figure 1' is expanded to include coastal erosion with flooding and reworded to explain that flooding and erosion are worsening and that this is predicted to continue.
- South West Water agrees that climate change and flooding are highlighted in 'Key Facts'.
- Some developers want the plan to include more information in Figure 1 such as:
 - Population growth forecasts
 - Forecast growth of age groups
 - Household growth in specific community sectors
 - Existing employment levels and forecast employment growth
 - East Devon's contribution to regional/sub-regional economy and changes to 2040
 - Where residents, services, facilities and employment opportunities are located
 - Key sustainable transport routes, corridors and other opportunities

- Carbon dioxide emissions

5.5 We have revisited Figure 1 to include new more up to date data, where available. However, it is seen as most relevant as a snapshot in time, now rather than a predictor of possible future outcomes.

Comments and response - the draft plan vision

5.6 In respect of the draft plan vision itself the comments reported in the feedback report were.

- There was a challenge raised around how the vision and objectives may be implemented and enforced in practice.
- There were comments that the vision and objectives could apply anywhere and were not East Devon focussed or specific (one respondent said “it’s quite boring”).
- Whilst we have not sought to count which aspects of the vision got most (or least) support, there were positive comments made about the importance environmental considerations and addressing climate change.
- National Highways broadly support the vision and objectives.
- Support for the principles of the vision and its objectives, with developer support for meeting housing needs (objective 4).
- In making comment several respondents referenced infrastructure provision, or more specifically lack of it, and raised concerns around affordable housing provision.
- Some respondents did not make comment directly on the vision or objectives but questioned/challenged their compatibility with policy or proposals set out elsewhere in the plan. At its starkest many expressed views that development proposals in the plan (specifically including some larger scale ones) were in direct contradiction to some of the objectives.
- The Vision and / or the objectives could usefully draw attention to the delivery of the second new town given its importance to the delivery of the plan. Such a statement would be entirely consistent with the NPPF
- The Local Plan falls short of its aim of delivering “a suite of ambitious and implementable policies which addresses the severity of the [climate] crisis that we are all facing”. We believe the Local Plan would benefit from bolder and more explicit measures to enable low/no carbon transport and nudge citizens away from single-occupancy private vehicles
- The Environment Agency consider that the vision could be more ambitious and have adaption and resilience to climate change as central elements – the consequences of climate will be profound, not just for the economy but also for the economy and society.

- Devon County Council (DCC) consider the vision doesn't help set the objectives and policies in the Plan and should also describe what East Devon will look like in the future (the economic vision on page 25 could be adapted by strengthening social and environmental aspects).
- The vision fails to consider how East Devon residents see their area, why they value and enjoy it, and wish to live in and visit it.
- Devon Wildlife Trust welcome Para 2.3 'A Greener East Devon, which prioritises issues arising from climate change and supports our natural environment.' but think that this statement could be strengthened by rewording to state '...and enhances our natural environment'. It also lists several proposed refinements/amendments to objectives to reflect wildlife concerns and importance.
- The East Devon AONB team welcomed and supported the Vision but queried whether the Regulation 19 submission will rely on the 2019 AONBs Landscape Character Assessment or whether these details will be updated in relation to proposed site allocations
- Some developers criticise the Vision because it is based on the latest Council Plan which only covers the period 2021 to 2023 and will soon be out of date, if not already because of the economic and cost of living crisis in 2022. The Vision therefore falls short of the NPPF requirement to provide a positive vision of the future.
- The developers emphasise that the Vision needs to flow for contextual analysis and its conclusions about the district's strengths, weaknesses, opportunities and threats. A positive vision can be developed to give a clear understanding of the Local Plan's role in responding to issues and threats, whilst capitalising on strengths and opportunities.
- There was a view that we should follow Planning Advisory Service guidance in developing a geographically specific Vision for East Devon for the plan period and beyond. It needs to recognise locational sustainability benefits e.g. of the locations for growth, responding to the following:
 - A direction of travel as to how the Plan area will evolve;
 - The general location of where development will take place and where it will not;
 - What the nature of development activity should be in key parts of the Plan area;
 - How levels and types of development will be accommodated, both in the short and longer term, in specific areas and in the most sustainable way;
 - Reference to the wider context of the Plan area, introducing the concept of co-operation with neighbouring authorities.

- There was a concern that the vision omits reference to the need to ensure non-residential development also is of high quality. It also does not consider built heritage (it focuses only on the natural environment)
- Housing Association planning consortium is pleased that affordable housing is given substantial recognition in the Vision, and supports this issue being a high priority
- Agents for Bourne Leisure advised that, to meet the requirements of the NPPF, the vision needs to provide a positive vision for the area and should be more focused on the area's needs and based upon a full understanding of the baseline context of East Devon. They consider that support for tourism and leisure should feature in the objectives for the emerging East Devon Local Plan, reflecting the character of East Devon as a rural district with significant reliance upon the visitor economy.
- The Devon Countryside Access Forum suggest the second part of the vision should be expanded to say "... including access to the natural environment".
- Exeter Cycling Campaign are concerned that the ambitious vision and objectives may fail to be realised in actual development. They are keen to see the clear and bold specific policies that are currently missing in this draft being stated in the final iteration of the plan.

5.7 The above points reflect a wide range of matters that were received in feedback. In some cases they relate to themes that are broad brush and over-arching and other relate far more closely to matters of greater topic-based detail. In providing feedback commentary we have sought to set to group matter raised under key theme subheadings. Where support was provided this is welcomed.

Locally distinctive vision

5.8 There was concern raised that the vision should be far more locally distinctive and less generic in nature. This is a concern that has been taken into account and a new vision has been drafted that is explicitly about East Devon and its future under local plan policy. As redrafted the vision sets out information on scales and locations for development over shorter- and long-term time horizons and relations with neighbouring areas. The process for new vision production involved a workshop that include a SWOT analysis (absence of this was a concern raised in objection).

5.9 In drafting the new vision we have tried to create content that reflects on how East Devon residents see and value the district and we hope in redrafted form it is not now boring.

Vision setting objectives

5.10 There was concern raised that the vision should help set the objectives. Whilst the objectives have not been revised they are seen to align with the plan vision.

Use of the Council Plan

- 5.11 In response to challenge that the vision was based on a soon to be dated Council Plan the insertion of a new bespoke vision overcomes this concern.

Climate change and environmental improvements

- 5.12 In the redrafted vision the issues of adaption and resilience to climate change features as a major theme, early on. This addresses a key theme in comments made, including by the Environment Agency, and there are more general 'green' themes more explicitly expressed in the vision as well as access to the natural environment, with this being a specific point of concern that was raised.

Planning for a new town and housing growth

- 5.13 There was challenge that the vision should explicitly refer to planning for a new town and also refer more generally to housing growth. On both counts the redrafted vision now addresses these matters, with affordable housing provision referenced through wording around greater choice of tenure.

Non-housing and development more generally

- 5.14 In amended form the new vision sets out a general overview of promoting high quality development, including for non-housing uses, and this explicitly includes employment and job generating uses. Such changes address a number of concerns raised through comment though we not see the need to explicitly address tourism or other specific sectors. However, we do now refer to built-heritage considerations which were referenced in comment received.
- 5.15 In response to a specific concern raised by an AONB team we would advise of no specific intent to update the landscape character assessment through site allocation assessment work. However, landscape assessment of sites has formed part of the allocation choice process.

Implementation of the vision

- 5.16 It is noted and recognised that establishing a vision and objectives is one task but implementing them in practice can be a different challenge. The ability of the East Devon local plan (and this applies to any local plan) to fully achieve objectives sought does rely on the quality and precision of policies and their implementation in practice. However, it is also significantly informed by (and sometimes constrained by) the legislative framework and national policies that are in place, plus practicalities of the development process. In respect of concerns about being bold in policy coverage we would see this as a policy rather than vision matter. We see the policies of the plan as being bold.

Infrastructure provision and delivery

- 5.17 Concerns around the ability to deliver infrastructure and whether this would also keep pace with development are also fully recognised. The Council will be producing an Infrastructure Delivery Plan and this will set out details on current levels of provision, problem and challenges and need generated from further development. It will also set out infrastructure delivery proposals and in many cases these will be reliant on working with and actions of third parties. In this respect it should be noted that the local plan is not an infrastructure delivery plan and many aspects and elements of infrastructure delivery and operation fall outside of the remit or role of the District Council and are distinct from the planning process.

Compatibility between vision and plan proposals

- 5.18 In terms of compatibility between plan objectives and some proposals in the plan we recognise that there are some significant and challenging proposals in the plan. But we do have a development agenda and requirements to see delivered and as such need to set out policies. A challenge, of course, is promoting development through policies that achieves best outcomes.

Comments and response - the draft plan objectives

- 5.19 In respect of objectives in the draft plan the comment reported in the feedback report were.
- Of those that commented directly on the objectives many were supportive though there were also comments around the ordering with various alternative ordering preferences proposed, with a view that ordering amounts to or implies or indicates prioritisation.
 - There was comment that some contradiction between objectives is inevitable and therefore they should be weighted.
 - Some respondents with specific interest concerns highlighted objectives that they regarded as especially significant.
 - The Environment Agency welcome the plan objectives set out in Table 1 and are pleased to see that Objective 2 (tackling climate change) goes beyond net zero and seeks to ensure the district adapts to the impacts of climate change – ensuring the District can adapt and is resilient to the impacts of climate change has the potential to make a big difference locally to long term sustainability.
 - DCC state Objective 2 “moves the district towards...” is not urgent enough and should state “To ensure all new development contributes to a radical reduction in greenhouse gas emissions by 2030 (50% reduction on 2010 levels) to achieve net-zero by 2040...”
 - Developers consider Objective 2 is ambiguous. Does not clearly articulate the role new development will have in moving East Devon towards net-zero carbon by 2040

- Developers assert that the main method in the plan for reducing carbon and other greenhouse emissions is through the location of development so identifying development at sustainable locations is key
- Some state that objectives and related policy should reflect existing legislation and nation planning policy and guidance, eg Only set performance standards for new housing/building adaptation up to Level 4 of the Code for Sustainable Homes.
- Developers generally support:
 - Objective 3, seeking to provide high quality homes to meet needs
 - Objective 4, providing support for business investment and job creation. Plan needs to provide for objectively assessed need for employment land
 - Objective 5, to promote vibrant town centres
- Amend objective 3 to state 'To provide sufficient high quality new homes to meet people's needs and aspirations' in order to provide a more positive framework and be consistent with NPPF
- Some overlap between Objective 6 and Objective 1
- DCC state Objective 7 only refers to built heritage which does not recognise the significant amount of heritage assets that do not form part of the built environment.
- Developers support Objective 8 (but have concerns eg about related policy for the level of biodiversity net gain)
- Developers support objective 9, promoting sustainable transport as a matter of principle, but it will need a package of policy responses – the spatial strategy is key
- The Exeter and Sidmouth Cycling Campaign groups support the policy goals and objectives relating to sustainable modes of transport, 20-minute neighbourhoods, cycling, prioritising walking and cycling links and improving the cycling environment
- Need a stronger commitment to working with Exeter City Council to ensure that new development in the West End does not undermine ECC's strategy of reducing single occupancy vehicle use.
- The Local Plan would benefit from giving much more attention to enabling low/no carbon transportation. The references to 'minimising the need to travel and provide access to sustainable transport' have little in terms of hard policy to back them up and deliver them.
- Some comments flow from objective 10 (securing infrastructure). Devon County Council (DCC) state it is essential that infrastructure necessary to support development is provided in a timely manner with appropriate funding mechanisms for education, transport and community infrastructure.
- Developers generally support Objective 11 (supporting sustainable and thriving villages)
- Support for the principles of the vision and its objectives, with developer support for meeting housing needs (objective 4).

- Lyme Regis Town Council support the strategic objectives which underpin the plan and the overall spatial strategy.
- There is no objective about services. DCC would like more emphasis on the need to provide access to good quality education and skills and supporting the most vulnerable

5.20 The new and more comprehensive Vision proposed for the Publication plan (in comparison with that in the draft plan) means that the objectives are of lesser significance. This to some extent supersedes debate and therefore actions and possible amendments arising from consideration of comments received on the draft plan objectives. Nonetheless it is seen as desirable to provide commentary in respect of key themes emerging. Commentary is set out below grouped on and around key subject matters. We have not identified a need to adjust objectives.

Priority ordering in the objectives

5.21 There were some comments querying whether the objectives were or should be in some form of priority order. The response is that by design they were not in any priority order (as plan text stated) and they were to be seen and taken as a whole. Likewise there was no intent that they should have been or should be weighted.

Feedback comments on specific plan objectives

5.22 Support for objective 2 on climate change, and related themes, is welcomed but it is recognised that some were of the view that objectives do not go far enough and the plan should be more ambitious. Whilst the plan is aspirational there are practicalities around the degree to which the plan can pursue limiting carbon emissions. In policy we go as far as is seen as reasonably achievable. It was also noted that in feedback that there was a challenge that the plan was seeking to set standards for new development that were too demanding.

5.23 The importance of housing and comments relating to objective 3 are noted and as highlighted there potentially could potentially have been merit in seeking to incorporate changes geared around meeting people's needs and aspirations. But on balance it is seen that as drafted the approach taken is reasonable. The support for Objective 4 around jobs and the economy is noted, though it is not considered that the plan needs, at an objectives level, to reference objectively assessed needs and meeting these.

5.24 In response to commentary about Objective 7 only referring to built heritage and not recognising the significant amount of heritage assets that do not form part of the built environment is a point that is noted, though it is a relatively minor matter and as such is not seen as key to warrant amendment. Objective 8, to protect and enhance our outstanding natural environment, is regarded as appropriate.

- 5.25 In response to comments around promoting sustainable transport the support given is welcomed. The issue of transport and improvements is recognised as critically important. It is also considered important that green travel initiatives promoted elsewhere, for example in Exeter, are not adversely impacted by development in East Devon.
- 5.26 In respect of Objective 10, securing infrastructure, it is agreed with comment that this is essential. It is also agreed that it will be desirable, as suggested by Devon County Council, that the plan could more fully reference services with more emphasis on the need to provide access to good quality education and skills and supporting the most vulnerable. Plan policy changes to Regulation 19 of the plan address these concerns.

6 Supplementary Regulation 18 consultation Spring 2024

- 6.1 Supplementary Regulation 18 consultation has no direct relevance to matters addressed in this report.

7 Sustainability Appraisal feedback

- 7.1 The draft local plan was supported by a Sustainability Appraisal⁷ (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.
- 7.2 The SA report advised of the need for alternative policy options tested in the SA to be consistent with the plan vision (see paragraph 2.17 of the SA). Whilst the Vision has now been amended it is not considered, in redrafted form, that alternative options texted in the SA work are non-consistent with the new Vision.
- 7.3 Chapter 4 of the SA specifically references the draft plan vision and more significantly the plan objectives. The SA work, for the draft plan advised, at paragraph 4.4, that:

“In general, there are a wide range of positive effects arising from the Local Plan objectives, to be expected as they are aspirational in their wording. Some uncertain negative effects are identified for those Local Plan objectives that encourage built development for biodiversity, landscape, and climate change – this will depend upon the location of development. There are many neutral or negligible effects because the Local Plan Objectives are focussed on a specific topic that is only relevant for certain parts of the SA framework. The cross-cutting

⁷ [sa-of-pos-consultation-draft-lp_2022.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/sa-of-pos-consultation-draft-lp-2022.pdf)

nature of climate change means there are several positive links between the Local Plan objectives and SA framework on this issue.”

- 7.4 An SA report to support the plan at Regulation 19 stage has been produced..

8 Habitat Regulation Assessment

- 8.1 The local plan will need to be assessed under the Habitat Regulations , work will support the Regulation 19 plan.
- 8.2 In early assessment work Chapters 1 and 2 are recorded As generating ‘no Likely Significant Effects’. This reflects the fact that the vision and objectives in the draft plan set out a direction of travel for subsequent policy, rather than being actual policy in their own right.

9 Redrafting the plan vision

- 9.1 At Strategic Planning Committee meetings in late 2023 and running into 2024 the Council considered a new plan vision and various redrafting’s of this. The vision now reflects the feedback from various consultation events, assessment processes to include the Sustainability Appraisal and also a member workshop held in late 2023.

10 Conclusions

- 10.1 This paper, this draft, sets out information around the redrafting of Chapters 1 and 2 of the local plan. This redrafting process has resulted in substantial changes to the plan vision. Chapters 1 and 2 of the plan have also been substantially reduced in length, in redrafting, to exclude material that is not relevant at the Publication stage of plan writing.