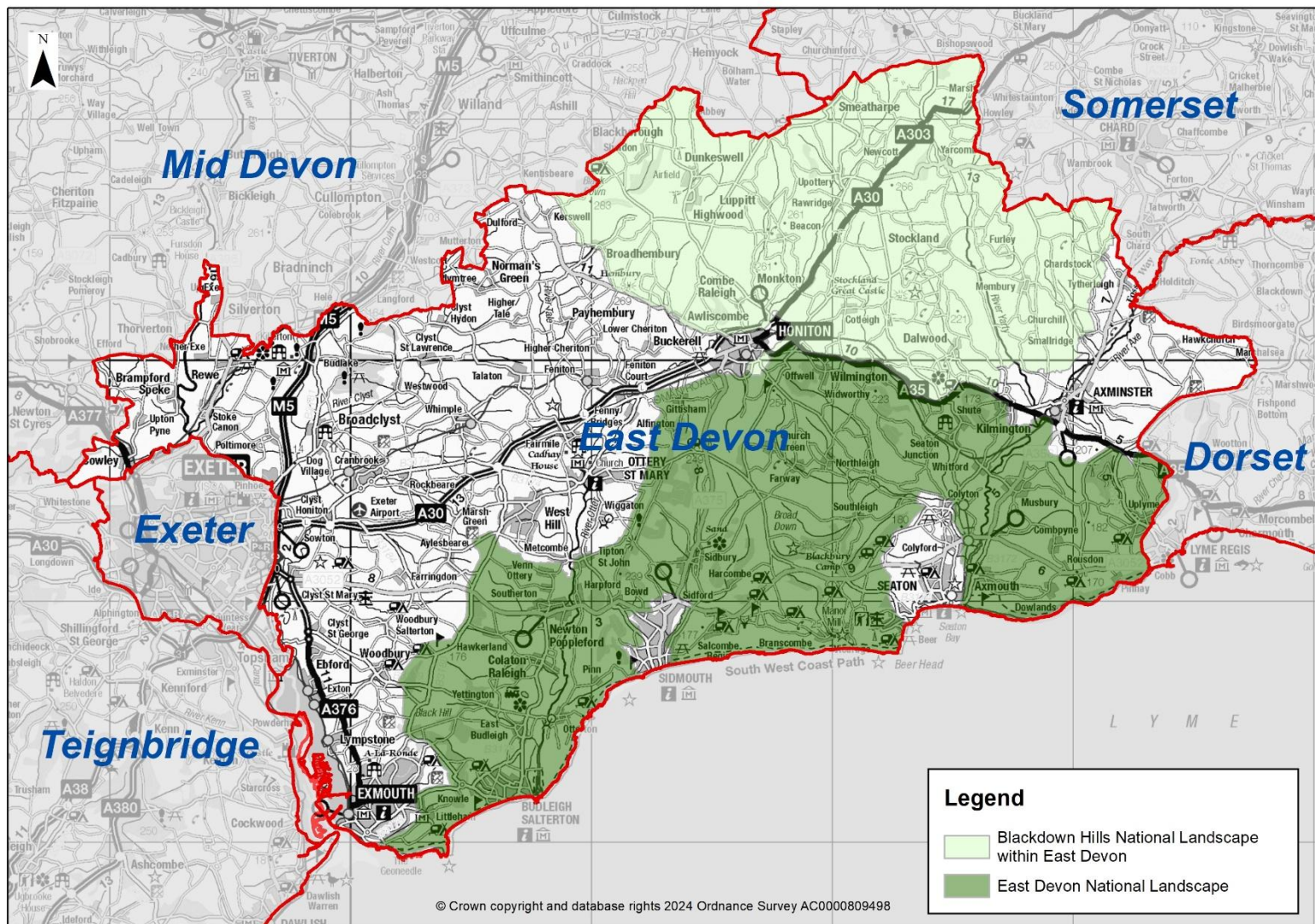


East Devon Local Plan - Duty to co-operate

CSD-010a Draft Statement of Compliance

Second Regulation 19 consultation version 01



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Cover photo: Map showing relationship of East Devon with neighbouring Local Planning Authorities and the East Devon National Landscape plus those parts of the Blackdown Hills National Landscape that are in East Devon.

Version	By	Date	Changes
V.01	EDDC	10/12/25	Draft for SoCG bodies to review with 2 nd Reg. 19 Local Plan

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1 Introduction and local plan context

- 1.1 This key supporting document highlights matters relating to the 'duty to co-operate' in relation to the evolution and preparation of the Publication draft (Second Regulation 19) version of the East Devon Local Plan. There may be new versions of this paper as plan making progresses into and through plan Examination. This is an updated version of the statement prepared for the first Regulation 19 consultation¹.
- 1.2 This statement demonstrates how EDDC has fulfilled its duty to co-operate obligations to date and has met the relevant legal requirements. It is structured in the following way:
 - a. This section (1) summarises the background to the duty to co-operate and highlights relevant sub-regional work, the plan preparation timetables of neighbouring authorities and the implications of local government re-organisation.
 - b. Section 2 lists the duty to co-operate bodies and other organisations relevant to the plan preparation;
 - c. Section 3 sets out the strategic geography relevant to the plan; and
 - d. Section 4 lists the strategic cross boundary matters identified during plan preparation and the parties involved. It also links to the relevant draft statements of common ground (SoCG) that have been prepared to examine these issues in more detail.
- 1.3 The duty to cooperate was introduced by the Localism Act 2011 and incorporated into Section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils, and other prescribed public bodies to engage constructively, actively, and on an ongoing basis to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters.
- 1.4 Paragraphs 24 to 27 of the National Planning Policy Framework (NPPF) stress the need to meet the duty to cooperate throughout plan preparation. The NPPF refers to addressing matters which cross administrative boundaries, the importance of co-operation in terms of delivering an appropriate strategy and the need for partnership working in terms of infrastructure planning.
- 1.5 The National Planning Guidance gives advice on how the duty to co-operate should be undertaken and recorded². It requires the relevant bodies to co-operate in the preparation of policies which address strategic matters, including in local plans. The guidance also requires the plan making authority to record a statement of common ground (SoCG) that sets out the

¹ [ksd-002-duty-to-co-operate.pdf](#)

² [Plan-making - GOV.UK](#)

progress made on strategic cross-boundary matters during plan preparation. This document comprises the duty to co-operate statement of compliance for the second Regulation 19 local plan consultation. It is supported by three Statements of Common Ground³.

- 1.6 East Devon is located in a two-tier area, where Devon County Council provide many services, including education and transportation. The Government has announced proposals for local government reorganisation⁴ in Devon that will result in the formation of a new unitary council by April 2028 under current timescales⁵. There are a variety of proposals for how local government will be organised in Devon, but it is certain to involve East Devon being combined with other Devon authorities. Reorganisation has already been undertaken in the neighbouring local planning authorities of Somerset and Dorset.
- 1.7 East Devon has a long history of working with neighbouring authorities and other partners on a variety of cross-boundary initiatives. Following the adoption of the current East Devon Local Plan in January 2016, EDDC formally agreed⁶ to prepare a statutory joint plan with the Greater Exeter Councils⁷. Work on the Greater Exeter Strategic Plan (GESP) progressed until 2020 when EDDC withdrew⁸ in accordance with the recommendation of the Strategic Planning Committee⁹. In withdrawing from the GESP, EDDC offered reassurance to its partners regarding fulfilling its duty to co-operate in an ongoing and positive partnership.
- 1.8 Although the GESP did not progress, a non-statutory joint strategy for the sub region of East Devon, Mid Devon, Teignbridge, and Exeter called 'Our Shared Coordinates' has been agreed¹⁰. Devon County Council also supported this work, which was progressed by a collaborative working group of the planning policy leads at the five Councils. The group continues to meet bimonthly and forms the basis of proactive collaborative work across the area. Our Shared Coordinates sets out a common, cross-authority agenda, for a sub-regional spatial geography, focussed at and around Exeter, for future growth and development. Our Shared Coordinates has informed our local plan policy and that of our neighbours and has been a key work element in ensuring we meet the Duty to Cooperate.
- 1.9 The Local Planning Authorities (LPA's) adjoining East Devon are at varying stages of plan preparation.

³ [Evidence and Examination Library \(First Regulation 19\) - Core Submission Documents \(CSD\) - East Devon](#)

⁴ [Letter: Devon, Plymouth and Torbay - GOV.UK](#)

⁵ [Devolution and local government reorganisation frequently asked questions | Local Government Association](#)

⁶ [Strategic Planning Committee report 21/07/16](#)

⁷ East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council, together with Devon County Council

⁸ [21 August 2020 - East Devon District Council approves withdrawal from Greater Exeter Strategic Plan - East Devon](#)

⁹ [Agenda item - Greater Exeter Strategic Plan: draft policies and site options consultation - East Devon](#)

¹⁰ [Joint Strategy - East Devon](#)

- a. The Teignbridge Local Plan¹¹ was adopted in 2014. The new Teignbridge local plan has been subject to a main modifications consultation¹² and is expected to be adopted in late 2025/early 2026.
- b. The Exeter Core Strategy¹³ was adopted in 2012. The new Exter Plan¹⁴ was submitted for examination in September 2025.
- c. The Mid Devon Local Plan was adopted in 2020¹⁵. The current Mid Devon Local Development Scheme¹⁶ was agreed in March 2025 with a notice to start plan making in August to November 2025, subject to the publication of new plan making regulations (that were expected in Summer 2025 but have not yet been published).
- d. Work on the Somerset Local Plan 2045¹⁷ commenced in 2023 and Regulation 18 consultation on a draft plan is planned for April 2026. Until the new plan is adopted, the current Local Plan documents for the former district council areas remain part of the Development Plan (for land adjoining East Devon the Taunton Deane Local Plan¹⁸ adopted in 2012 and the South Somerset Local Plan¹⁹ adopted in 2015).
- e. Work on the Dorset Plan²⁰ started in 2019, with an options consultation in 2021 and a further options consultation in August 2025²¹. The intention is to consult on a Regulation 19 plan in August 2026 and submit for examination in December 2026 under the current plan making system²². Until the new plan is adopted, the current Local Plan documents for the former district council areas remain part of the Development Plan (for land adjoining East Devon the West Dorset, Weymouth and Portland plan adopted in 2015²³).
- f. Torbay is a unitary council that is separated from East Devon by the Exe Estuary and Teignbridge District and by Exeter and Teignbridge on land. It is included in this statement because in the first Regulation 19 consultation Torbay requested that East Devon meet part of its housing requirement. The Torbay Local Plan²⁴ was adopted in 2015. Consultations on updating the housing policies of the plan were held in 2022, but changes to the national

¹¹ [Teignbridge Local Plan 2033 - Teignbridge District Council](#)

¹² [Local Plan Review - What is the Local Plan? - Teignbridge District Council](#)

¹³ [Current Local Plan - Core Strategy - Exeter City Council](#)

¹⁴ [Exeter Plan: Submission and Examination - Exeter City Council](#)

¹⁵ [Adopted Local Plan and Policies Maps - MIDDEVON.GOV.UK](#)

¹⁶ [Mid Devon LDS](#)

¹⁷ [Somerset Local Plan 2045](#)

¹⁸ [Adopted Local Plans](#)

¹⁹ [Adopted Local Plans](#)

²⁰ [Planning Policy - Dorset Council](#)

²¹ [Dorset Council Local Plan Options Consultation August 2025](#)

²² [Dorset LDS](#)

²³ [West Dorset, Weymouth & Portland adopted local plan - Dorset Council](#)

²⁴ [Local Plan 2012-2030 - Torbay Council](#)

planning context in 2023 meant that further stages of the plan update were not progressed²⁵. The LDS²⁶ published in February 2025 indicates that a Regulation 19 consultation will be undertaken in May 2026 with plan submission in October 2026.

²⁵ [The local plan update: a landscape to thrive - Torbay Council](#)

²⁶ [Local Development Scheme - Torbay Council](#)

2 Duty to co-operate bodies

2.1 As part of the preparation of the local plan, East Devon District Council (EDDC) has collaborated extensively with other Councils, prescribed bodies, and other relevant organisations.

2.2 The bodies which are subject to the duty to co-operate are set out in Section 33A of the Planning and Compulsory Purchase Act 2004. In the case of the East Devon local plan these comprise:

- Devon County Council (DCC)
- Somerset Council (SC)
- Dorset Council (DC)
- Exeter City Council (ECC)
- Mid Devon District Council (MDDC)
- Teignbridge District Council (TDC)
- Environment Agency (EA)
- Historic England (EA)
- Homes England (HE)
- Natural England (NE)
- National Highways (NH)
- Office of Rail and Road (ORR)
- Civil Aviation Authority (CAA)
- NHS England (NHS England)
- NHS Devon Integrated Care Board²⁷ (NHS)
- Marine Management Organisation MMO

2.4 In addition, we have a statutory duty to involve the Devon Local Nature Partnership. Given the importance of landscape and wider environmental issues to the local plan, we have also treated the National Landscape partnerships as duty to co-operate partners.

2.5 Infrastructure issues in particular have required co-operation with other bodies not formally covered by the legal duty to co-operate. These bodies include:

- Network Rail (NR)
- National Power (NP)

²⁷ Formal responses on the plan have been received from the LPAE-DEVON (TORBAY AND SOUTH DEVON NHS FOUNDATION TRUST) on behalf of the NHS Devon Integrated Care Board and Royal Devon University Healthcare NHS Foundation Trust

- Western Power (WP)
- Devon and Cornwall Police (DCP) and
- Sport England (SE).

2.5 South West Water (SWW) are responsible for the supply of potable water and treatment of waste/sewage for the whole of East Devon. Water companies have a statutory duty to serve new development and to meet environmental criteria set by the Environment Agency. Investment is planned in 5 year periods and is informed by the Local Plan. The Water Cycle Study²⁸ has identified constraints on some wastewater treatment works that could affect the phasing of development. The second Regulation 19 local plan includes an expanded policy on water quality and efficiency (Strategic Policy AR02). South West Water has therefore been identified as a body with which agreement is sought on water quality issues.

²⁸ [Evidence and Examination Library - Climate Change and Flooding \(CCF\) - East Devon](#)

3 Strategic Geography

- 3.1 East Devon lies to the southeast of Devon, having boundaries with Exeter City, Teignbridge and Mid Devon and extending eastwards to the county borders with Dorset and Somerset.
- 3.2 East Devon is primarily a rural area with an outstanding natural environment, reflected in the designation of its southern coastline as part of the Dorset and East Devon Coast World Heritage Site and 57% of the District being designated as a National Landscape. However, the close proximity of the city of Exeter to the western boundary of East Devon has helped to fuel demand for major developments.
- 3.3 The Exeter and East Devon Growth Point was formed in 2008 to help deliver strategic growth of around 25,000 new homes and over 25,000 jobs in the period up to 2026. The majority of the major strategic developments delivered and promoted in the Growth Point Area fall in East Devon, including: Cranbrook new community; Exeter Science Park; urban extensions/new housing east of Exeter; Skypark Business Park; and Strategic Transport Schemes. These developments formed a focus for growth in the adopted local plan²⁹ and have partly been delivered. Since starting as a green field in 2011, Cranbrook has grown to around 3,000 dwellings and the Cranbrook Plan³⁰ includes policies for expansion to nearly 8,000 homes. The Exeter and East Devon Enterprise Zone³¹ was launched in 2017 and has four separate sites: Exeter Science Park, Skypark, Power Park and Cranbrook town centre.
- 3.4 The western part of East Devon continues as the strategic growth focus in the new local plan, with a second new community called Marcombe, that will commence during the plan period and extend beyond it to around 10,000 homes. Additional developments are included in the plan at the Enterprise Zone, Science Park and at and around Exeter Airport (which is in East Devon). An urban extension on land north of Topsham on the boundary with Exeter City will require joint working to ensure development and infrastructure needs progress in a coordinated cross-boundary manner.
- 3.5 Development in western parts of East Devon has the potential to impact the designated European wildlife sites of the Exe Estuary, East Devon Pebblebed Heaths and Dawlish Warren (in neighbouring Teignbridge). Since 2015, housing and tourist accommodation developments within 10 kilometres of these designated areas have had to pay for habitat mitigation through the provision of Suitable Alternative Natural Green Space (SANGS). The Clyst Valley Regional Park

²⁹ [Local Plan 2013-2031 - East Devon](#)

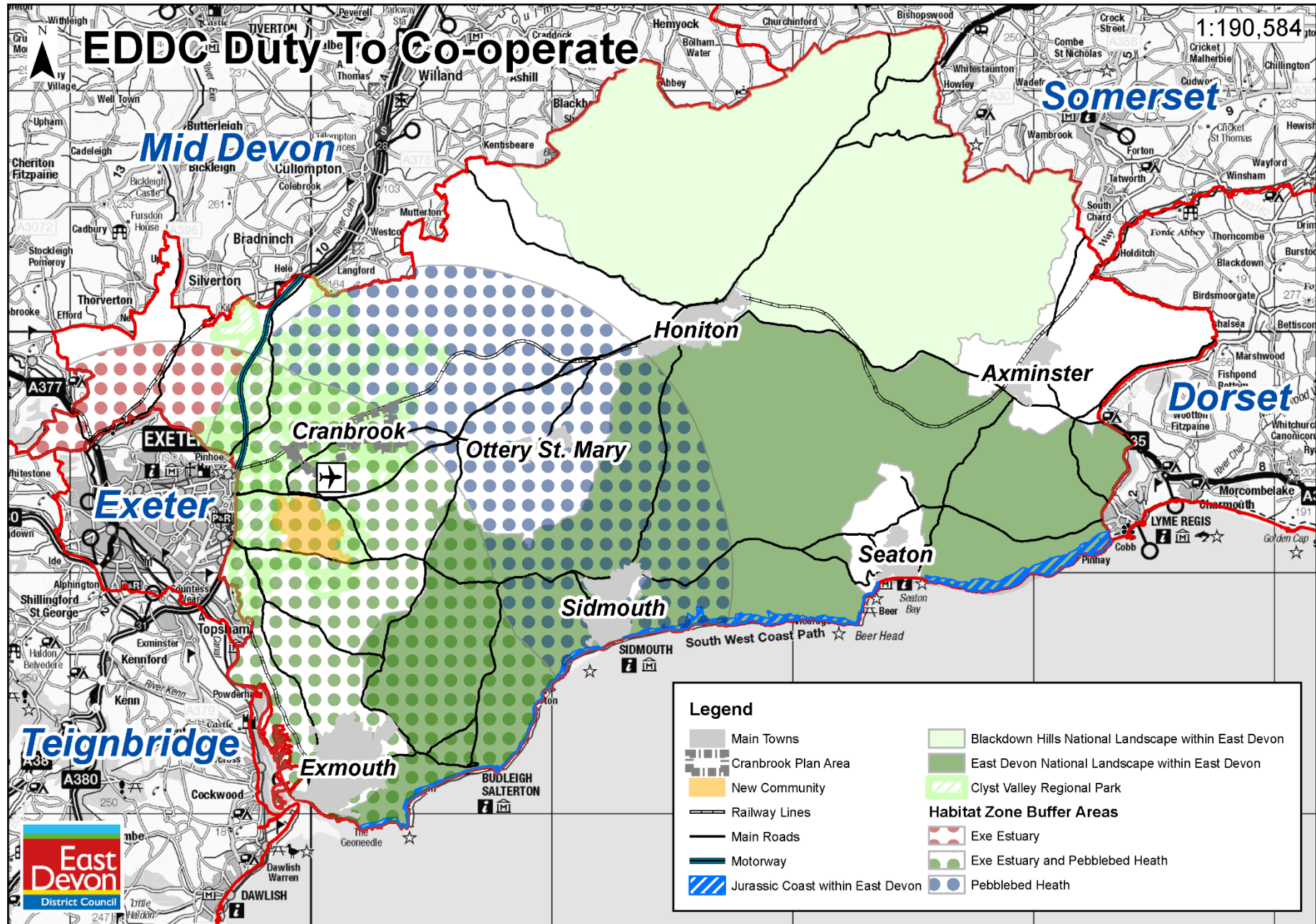
³⁰ [Cranbrook Plan - East Devon](#)

³¹ [Enterprise Zone](#)

is the largest SANG in East Devon and is being developed to provide high quality green space at a large scale to compliment strategic growth in the area.

- 3.6 The River Axe is designated as a SSSI for most of its length in East Devon and extending over the county border into Dorset and Somerset. However, its wildlife interest is deteriorating as a result of excess phosphates in the river, most of which come from agricultural run-off, though a sizable proportion is from treated sewage. In December 2024, EDDC was successful in a bid for Government finance for a Local Nutrient Mitigation Fund, which also applies to the Axe catchment in Somerset and Dorset. The fund will be used to identify and implement measures to address the impact of pollutants entering the watercourse alongside developer contributions.
- 3.7 There are two railway lines with stations in East Devon. The 'Avocet Line' runs along the banks of the Exe Estuary from Exeter and terminates at Exmouth. It has stops at the Commando Station and small settlements along the estuary and provides a half hourly service. The London Waterloo to Exeter railway line provides, at best an hourly service to the towns of Cranbrook, Honiton and Axminster and the villages of Feniton and Whimble. There are plans for a passing loop to improve reliability and increase train frequency.
- 3.8 The strategic road network in East Devon comprises the M5 motorway running north/south to the west of the District and the A.30/303 running northeast/southwest with the A.35 branching off to the southeast from Honiton. The A373, A375, A376 and A378 provide north south links with the A3052 being the main southern route from east to west. Traffic volumes on the strategic road network are seasonally varied and there can be significant capacity issues related to tourist traffic. The wider road network is quite rural (with many settlements being served only by narrow lanes) and does not experience significant congestion, although there are capacity issues on the road links in the east of Exeter that can feed back into East Devon, particularly around the village of Clyst St. Mary.
- 3.9 Map 1 – East Devon Strategic Geography illustrated some of the key factors, including the main settlements, proposed new community, national landscapes, World Heritage Site, key transport routes, Clyst Valley Regional Park and the habitat mitigation zones.

Map 1 – East Devon Strategic Geography



4 Strategic matters

4.1 Table 1 highlights the strategic matters that are considered to be relevant to the second Regulation 19 local plan to enable an overview of the issues and key partners. Greater details are included in the relevant SoCG.

4.2 Table 1 – Summary of strategic matters

Matter	Issue	Partners	SoCG
Housing	H01 - Meeting the East Devon Housing Requirement	Dorset Somerset Mid Devon Exeter Teignbridge	Housing. Employment and Site Allocations

Matter	Issue	Partners	SoCG
	H02 - Meeting the housing requirements of other local planning authorities	Dorset Somerset Mid Devon Exeter Teignbridge Torbay	Housing. Employment and Site Allocations
	H03 – Meeting the Gypsy and Traveller requirement	Dorset Somerset Mid Devon Exeter Teignbridge Devon County	Housing. Employment and Site Allocations
Employment	E01 - Meeting East Devon employment needs	Dorset Somerset Mid Devon Exeter Teignbridge	Housing. Employment and Site Allocations
	E02 – Meeting the employment needs of others	Exeter City	Housing. Employment and Site Allocations
Site allocations	A01 - Cross boundary impacts of Marlcombe	Exeter City Council Devon County Council National Highways Historic England Environment Agency	Housing. Employment and Site Allocations

Matter	Issue	Partners	SoCG
		Natural England NHS Devon Integrated Care Board.	
Site allocations	A02 - Cross boundary impacts of North of Topsham mixed use allocation	Exeter City Council Devon County Council National Highways Environment Agency Natural England NHS Devon Integrated Care Board.	Housing. Employment and Site Allocations
Transport	T01 'Transport impact of development in the Greater Exeter area'	Devon County Council Exeter City Council Teignbridge District Council Mid Devon District Council National Highways	Transport
	T02 'Rail infrastructure'	Network Rail Devon County Council National Highways	Transport
	T03 'Walking, Wheeling, Cycling and Bus links between the West End of East Devon and Exeter'	Exeter City Council Devon County Council National Highways	Transport
Climate Change	C01 Mitigation	Devon County Council Exeter City Council	Environment and Infrastructure

Matter	Issue	Partners	SoCG
		Teignbridge District Council Mid Devon District Council Dorset Council Somerset Council	
	C02 Adaptation	Environment Agency	Environment and Infrastructure
Infrastructure	I01 Delivery of supporting infrastructure	Devon County Council Environment Agency Natural England Historic England National Highways NHS England Network Rail National Power Western Power Devon and Cornwall Policy Sport England	Environment and Infrastructure
Water Quality	W01 River Axe catchment	Natural England Environment Agency Dorset Council Somerset Council South West Water	Environment and Infrastructure

Matter	Issue	Partners	SoCG
		Blackdown Hills National Landscape	
	W02 River Exe	Natural England Environment Agency Exeter City Teignbridge Mid Devon South West Water	Environment and Infrastructure
	W03 All East Devon waterbodies	Natural England Environment Agency South West Water	Environment and Infrastructure
	W04 Impact of increased housing numbers	Environment Agency South West Water	Environment and Infrastructure
Biodiversity	B01 - Nature recovery	Natural England	Environment and Infrastructure
Habitat mitigation	H01 In combination impacts on Exe Estuary SPA and Pebblebed Heaths SAC	Natural England Exeter City Teignbridge	Environment and Infrastructure
	H02 Impact of pollution from additional traffic using roads on Pebblebed Heaths SAC	Natural England Devon County Council	Environment and Infrastructure
Landscape Seascape	L01 Potential impact of wind farms on heritage assets and the national landscapes	Historic England East Devon National Landscape Blackdown Hills National Landscape	Environment and Infrastructure

5 Timetable for on-going co-operation and statements of common ground.

5.1 The second Regulation 19 Plan will be subject to consultation until noon on 26th January 2026.

5.2 It is anticipated that the local plan will be submitted for examination in the Spring of 2026.

5.3 The draft SoCG that accompany this statement will be discussed with the bodies concerned and finalised by the time of plan submission.

5.4 It may be that not all matters can be resolved by plan submission. In this case, the statement of common ground will highlight any outstanding issues where it has not been possible to reach agreement and the reasons for this.

Appendix 1 – Key milestones in plan preparation

- Collaborative working to address cross boundary strategic issues has been undertaken throughout plan preparation, largely on a topic basis at the appropriate geography and with the relevant partners. Formal consultation stages have been used to ‘take stock’ of matters through the compilation of various reports that summarised what work had been undertaken and the need for further collaboration.
- Consultation on an Issues and Options [Report](#) was undertaken in January 2021. At the same time, an email was sent to all the ‘duty to co-operate bodies’ – these comprised the neighbouring local planning authorities and ‘prescribed bodies’, together with the South West Local Enterprise Partnership (the functions of which have now been transferred to Devon County Council), the Devon Local Nature Partnership and the National Landscape teams for East Devon (East Devon, Blackdown Hills and Dorset Partnerships). The email set out the timetable for plan preparation and asked for views on which ‘substantive matters’ relating to cross boundary strategic issues needed to be addressed in the local plan.
- The responses received were reported to the Strategic Planning Committee (SPC) meeting of [22/06/21](#), together with a summary of the issues relevant to the duty to co-operate that would need to be considered through plan making.
- These matters were worked through on a topic basis through various contacts and meetings with the relevant bodies and fed into a consultation on a draft plan from November 2022 to January 2023.
- Following the consultation, responses from the duty to co-operate bodies that raised relevant cross boundary strategic issues were summarised and reported (in Appendix 1) to the SPC of [05/09/23](#). Appendix 2 of that report included a table of the issues that needed to be addresses, together with the partners involved, links to the available evidence and actions that had been or would need to be undertaken. In September 2023, this was sent out to the duty to co-operate bodies asking for comments and suggestions of any issues that had been missed. The responses received were fed into the first Regulation 19 plan and were summarised in the Duty to Co-operate [Statement](#).
- This statement and the associated SoCG set out further work that has informed the second Regulation 19 plan and identifies where further work is required prior to plan submission.