

Agenda for Strategic Planning Committee Tuesday, 5th May, 2026, 10.00 am

Members of Strategic Planning Committee

Councillors: B Bailey, J Bailey, K Blakey, O Davey, P Faithfull, P Fernley, C Fitzgerald, P Hayward, M Howe (Vice-Chair), B Ingham, G Jung, D Ledger, Y Levine, T Olive (Chair) and H Parr

Venue: Council Chamber, Blackdown House, Honiton

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(or group number 01395 517546)

Friday, 24 April 2026



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This meeting is being recorded for subsequent publication on the Council's website and will be streamed live to the [East Devon District Council Youtube Channel](#).

1 Minutes of the previous meeting (Pages 3 - 13)

2 Apologies

3 Declarations of interest

Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)

4 Public speaking

Information on [public speaking](#) is available online

5 Matters of urgency

Information on [matters of urgency](#) is available online

6 Confidential/exempt item(s)

To agree any items to be dealt with after the public (including the Press) have been excluded. There are no items which officers recommend should be dealt with in this way.

7 East Devon Local Plan - Progress Update Report (Pages 14 - 139)

This report provides an update on progress of the East Devon Local Plan.

8 Heritage Strategy 2024-2042 (Pages 140 - 294)

9 Self-Build and Custom House-Building Update and Monitoring Report for 2024 - 2025 (Pages 295 - 332)

This report sets out the new method used by officers to 'count' the supply of self-build plots following the introduction of new legislation that took effect from the start of 2024.

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[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL**Minutes of the meeting of Strategic Planning Committee held at Council Chamber, Blackdown House, Honiton on 3 March 2026****Attendance list at end of document**

The meeting started at 10.01 am and ended at 2.10 pm. The meeting was adjourned at 12.45 pm and reconvened at 1.20 pm.

45 Minutes of the previous meeting

The minutes of the previous meeting held on 6 January 2026 were confirmed as a true record.

46 Declarations of interest

Minute 50. Update on work on production of the East Devon Local Plan. Councillors Brian Bailey, Paula Fernley, Geoff Jung advised lobbying in respect of Exmo_20

Minute 51. East Devon Water Cycle Study
Councillors Geoff Jung advised lobbying in respect the River Otter and sewage.

Minute 52. Cranbrook Category 4 Infrastructure Contributions.
Councillor Jessica Bailey, Other Registerable Interest, Devon County Councillor and a member of Devon & Somerset Fire and Rescue Authority.

Minute 53. Habitat Regulation Non-Infrastructure Contributions.
Councillor Geoff Jung, Affects and prejudicial Non-registerable Interest, Chair of South and East Devon Habitat Regulations Executive Committee.

47 Public speaking

Nigel Humphrey addressed the Committee regarding the draft Local Plan. He reminded Members that he had spoken at the meeting in January, asking them to consider the public's concerns about Exmo_20, which had received over 2,500 objections. He expressed disappointment that these concerns appeared to be disregarded, noting that any alteration to the Local Plan at this stage would be treated as a significant change and therefore not permitted – yet he questioned, there is no clear definition of what constitutes a significant change.

Mr Humphrey also highlighted the absence of a Habitat Regulations Assessment and an air quality mitigation report raising doubts about whether such reports could adequately address the issues associated with Exmo_20 and the Pebblebed Heaths. He further questioned the realism of the spatial strategy, asking why Exmouth was expected to accommodate the highest level of growth when the area has only two access routes, both already operating beyond capacity.

Mr Humphrey urged the Committee to give serious reconsideration to Exmo_20 before it's too late.

Thomas Shillitoe addressed the Committee regarding the draft Local Plan stating that in his view it represented a missed opportunity to resolve significant shortcomings and was therefore unadoptable, being both unsound and unlawful. He formally alleged maladministration in relation to what he described as misleading and unreliable evidence relating to Exmo_20 and also claimed that certain evidence had been fraudulently fabricated.

He stated that over a year ago there had been no supporting Habitat Regulations Assessment and no mitigation strategy in place and that despite this the Committee were advised that officers were satisfied impacts can be mitigated, a conclusion which Mr Shillitoe argued was unsupported by evidence. He added that as recently as November, qualified professionals working on this matter were still indicating that there may be no option capable of fully mitigating the impacts.

Mr Shillitoe also highlighted additional constraints affecting Exmo_20 that had emerged since the site was selected, most recently the discovery of prehistoric archaeology. He reminded the Committee that, in light of these developments, they had a duty to revisit the site's viability.

John Hamill addressed the Committee regarding the draft Local Plan. He noted that over 18 months, Members had been presented with detailed accounts of procedure breaches, yet Exmo_20 remains within the Plan, despite many Members acknowledging – often 'with a heavy heart' – that it should not be included.

In his view the Council was relying on government housing numbers and requirements as justification, and he suggested that removing the site at this stage was being portrayed as jeopardising the entire Local Plan. He argued that Members had lost sight of the needs and the wishes of the local community and of the significant harm Exmo_20 could cause to the natural and historic environment, the already fragile water and sewage systems and the local road network.

Kerin Hamill addressed the Committee regarding the Local Plan and drew attention to the definition of the word 'consultation' noting that the Oxford dictionary describes it as a process undertaken before a decision is finalised, with the purpose of gathering opinions and advice. She expressed concern that despite the large number of comments submitted for Exmo_20, the Council had not taken them into account, which in her view suggested a degree of arrogance, lack of care and a failure to respect the area's natural landscape.

Mrs Hamill compared Exmo_20 to a housing allocation in Dunkeswell that had not been supported for development on the grounds that it lay within a National Landscape, was poorly located and would erode, detract from and harm the setting of the Conservation Area. She highlighted what she perceived as inconsistency between the decision and the approach taken toward Exmo_20.

She also questioned the need for further housing in the area, noting that many new properties remain empty and others have been unoccupied for years. Mrs Hamill urged Members to show courage in protecting the district's heritage and countryside.

A statement was read out on behalf of Emily Glanfield who contended that the housing figures within the Local Plan were incorrect, inconsistent and based on outdated data. She noted that several supporting documents contained mathematical errors and did not reflect the correct calculation, which she believed to be 924.7 homes per year.

Ms Glanfield explained that pandemic-era housing trends had distorted East Devon's figures, resulting in a number 22% higher than the 2024 figure. She added that if the 2025 data was similar to 2024, the five-year average would fall, meaning current targets were significantly overestimated. She also questioned the increasing headroom figures that East Devon had stated was a requirement from central government. The headroom was originally set at 10%, increased to 13% and expected to shortly rise to 16%. Ms Glanfield argued that headroom should remain at 10% for the first five years.

The statement warned that the Local Plan would commit the district to building on far more land than necessary, raising concerns about food security. She proposed instead 925 homes per year plus 10% for five years, reducing the total requirement from 23,408 to 20,805. Finally, Ms Glanfield encouraged councillors to use existing mechanisms to lower housing targets so that future decision-makers were not constrained.

In response to the statement from Emily Glanfield the Assistant Director – Planning Strategy and Development Services explained the recent change to the standard method for calculating housing need. He noted that this issue had been covered in a report presented at the meeting on 2 September 2025. The report made clear that the calculation changes every year because it is based on the affordability ratio. As a result, the standard method figure had recently gone down, but no alterations were proposed because the figure could rise or fall again in the future.

He also reminded Members about the 80% transition arrangements, stressing that keeping a reasonable level of headroom in the housing numbers would be important if the Council wished to defend its position.

The Chair responded to the allegations made against the Council, by explaining that, should residents believe they have grounds to claim maladministration, they must follow the formal complaints procedure. Through that process, he and the officers would address matters based on evidence, rather than accusations made in the court of public opinion. He also added that, they have the option of pursuing a judicial review if they feel it is necessary.

48 **Matters of urgency**

There were no matters of urgency to discuss.

49 **Confidential/exempt item(s)**

There were no confidential or exempt items to discuss.

50 **Update on work on production of the East Devon Local Plan**

The Committee received a report providing an update on the preparation of the East Devon Local Plan, following the close of the second stage of Regulation 19 consultation on 26 January 2026. Members were advised that approximately 3,200 separate comments had been submitted which included points that had been previously raised and including a significant number of objections to specific site allocations - particularly Exmo_20, which received 1,500 responses. It was noted that a detailed feedback report summarising the consultation responses would be presented at the next meeting.

The Assistant Director – Planning Strategy and Development Services outlined further technical work that still needed to be completed, including:

- West End focussed transport assessment to consider growth impacts around Marlcombe, the M5 and the A30,
- An assessment of Air quality impacts at the Pebblebed Heaths, required to ensure a satisfactory Habitat Regulations Assessment prior to the submission of the Local Plan. This work is being undertaken by independent consultants Ricardo.

The current timetable for preparing the Local Plan is as follows:

- Submission: Spring 2026
- Strategic Planning Committee: May 2026
- Full Council: Early June 2026
- Examination, including Inspector's Hearings: June 2026

The questions raised included:

- Confirmation was requested about whether there remains a requirement to demonstrate a five-year housing land supply and how confident officers are that this can be achieved. The Committee noted that the requirement remains in place and were advised that the latest monitoring report showed the Council currently has a 3.5 year housing supply. Officers confirmed that this will continue to be monitored and that the five-year figure is expected to be demonstrated at the point of adoption.
- Whether additional time will be provided to resolve any outstanding issues with the Plan. It was confirmed that further time could be allowed during the examination period if additional work on the Local Plan was required. It would depend on how the Plan was viewed by the Inspectors and what recommendations they made.
- Further information was sought on how air quality impacts could be addressed on the Pebblebed Heaths. While no definitive mitigation strategy is in place at present, it was advised that the independent consultants Ricardo have identified potential measures, including encouraging the uptake of electric vehicles and exploring changes to farming practices, such as introducing covered digestate storage facilities.
- Clarification was sought about the length of time for the technical work to be completed. The Assistant Director – Planning Strategy and Development Services confirmed that all technical reports must be completed by 12 June 2026 to submit for examination.
- The Chair asked for clarification on what steps could be taken if evidence indicates that the Council does not have a satisfactory mitigation strategy. The Assistant Director – Planning Strategy and Development Services explained that achieving a satisfactory outcome to the Habitat Regulations Assessment is a legal requirement. If this cannot be achieved within the current timeframe, the Council will need to revise the schedule to allow sufficient time to reach compliance. At present, the Council is awaiting the findings from Ricardo, the independent environment consultancy.
- A question was raised about the use of AI and how will the accuracy of AI-generated summaries of residents' input be verified. It was confirmed that AI will be used to assist in producing summaries, and the Committee was reassured that a checking process will be carried out to ensure the summaries are accurate and reflective of the responses received.
- Clarification was sought on whether the Pebblebed Heath mitigation strategy considers planting to encourage stronger vegetation growth along the roadsides to help improve the air quality. It was suggested that such planting could help address pollution impacts at ground level and potentially improve soil nutrient

conditions. Other management measures could include the uptake of electric vehicles

- Clarification was sought regarding the potential status of the Local Plan following Local Government reorganisation. If adopted, the Local Plan will remain in force by the new unitary authority until it is superseded by the next Local Plan, which is reviewed every 5 years.
- A question was asked about the extent to which the Water Cycle Study will influence the overall Local Plan and in response it was confirmed that no changes to the Plan are currently envisaged as a result of the study.
- A question was raised regarding site allocation Exmo_20 and its relationship to the survey on housing needs in Exmouth. It was noted that Exmo_20 does not reflect the survey findings in terms of type and quality of housing identified as needed, which emphasised affordable housing. Concerns were expressed about whether the minimum requirement for affordable housing would be delivered on this site, and why the Council is continuing to pursue Exmo_20. The Chair reminded the Committee that it had previously agreed the affordable housing policy, which provides for 35% affordable housing, comprising 70% shared ownership and 30% social rent.

RESOLVED:

That the contents of the report be noted and the proposed programme of works going forward be endorsed.

51 **East Devon Water Cycle Study**

The East Devon Water Cycle Study report provided the Committee with a summary of the findings of the study and the responses received from the consultation which included the responses from statutory consultees including Natural England and the Environment Agency and how the work should be taken forward. The Committee noted that a final detailed feedback report will be provided at a later meeting.

The Assistant Director – Planning Strategy and Development Services advised that the main findings identified significant issues with wastewater capacity. Several wastewater treatment works, including those at Colyton, Honiton, Fluxton, Feniton, Otterton, Maer Lane and Dunkeswell are projected to exceed or approach their permitted dry weather flow limits post developments and will require upgrades or phased developments.

The Committee noted that particularly serious capacity issues were reported for the Maer Lane and Countess wear treatment works. Significant upgrade works are required at both sites, and a new wastewater treatment works will be needed to accommodate future pressures at Countess wear.

Key recommendations:

- Adopt the lower water efficiency standard of 110 litres/person/day for new development.
- Monitor and strictly regulate new abstractions and wastewater discharges.
- Phase development to match infrastructure upgrades and capacity increases.
- Where new developments are within the scope of the Environmental Impact Assessment (EIAs) Regulations ensure that they include assessment of their impacts on water services and protected habitats.
- Integrate biodiversity-friendly design and restrict development in sensitive coastal and riverine areas.

- Continue stakeholder collaboration (EDDC, SWW, Environment Agency, Natural England) to ensure sustainable growth and environmental protection.

The Assistant Director – Planning Strategy and Development Services referred to the RAG rating table in the report which reflected the significance of the comments received from South West Water, Environment Agency and Natural England. He drew the Committee's attention in particular to the Environment Agency's comments, which raised a number of detailed technical points and provided reassurance that although further work is required, there is no need to make any material changes to the Local Plan.

Feedback has been requested from the consultants, Haskoning, and from South West Water, with the intention of obtaining additional data and information to update and amend the study in order to address the concerns raised.

Questions and points raised included:

- Clarification was sought about why storm overflows and the EDM data did not feature within the report. In response the Assistant Director – Planning Strategy and Development Services stated that these did not feature because the study was based on dry weather flows.
- A question was asked about how the requirement for smart water butts, imposed through Planning Committee, would be enforced. It was noted that monitoring compliance on new developments would be challenging due to limited enforcement capacity, which makes it difficult to carry out checks to ensure installation.
- A question was asked about whether Grampian conditions can be appealed. It was advised that any condition can be appealed and overturned.
- A point was raised about the need to clearly identify which wastewater treatment works are operating ineffectively, as well as those requiring upgrades and the nature of those upgrades.
- A query was raised about conflicting comments from the statutory consultees and how a robust and sound Water Cycle Study can be achieved in light of the differences.
- A point was raised about the insufficient infrastructure available to support water supply for new developments, noting in particular that it is proposed for the new town, Marcombe, to receive its water supply from Wimbleball.
- It was noted that the Environment Agency intends to reduce abstraction from the Otter by 14 million litres a day and questioned whether the Water Cycle Study has been informed of the timing of this change.
- Concern was raised about the Countess wear Sewage Treatment Works, noting that it also serves Exeter and Teignbridge, both of which are accommodating new housing developments. It was highlighted that there is a need for discussions with both authorities to ensure a coordinated approach.
- Concern was raised about the implications of diverting wastewater away from the west end of East Devon, noting that the Exe Estuary is a protected area where no further deterioration of its environment is permitted and South West Water has been very reluctant to provide detailed information.
- A question was raised about how the Council can address its lack of confidence in South West Water and whether the recommendation should be strengthened to reflect this.
- A question was raised about whether the Local Plan could include a policy requiring South West Water to provide evidence on sewage capacity for every new planning application. In response the Assistant Director – Planning Strategy and Development Services confirmed that South West Water is challenged where

its findings do not align with those of the Water Cycle Study and further evidence has been requested in such cases.

- It was noted that the Water Cycle Study should feature prominently within the introductory section of the Local Plan.

In response to comments about the lack of confidence in South West Water and the need for a strengthened recommendation the Chair proposed an amendment to the second recommendation as follows:

That Members note that further work is required with the Environment Agency, Natural England, South West Water and other stakeholders, to:

- i. Agree a common understanding on the current position of East Devon's water infrastructure, particularly in relation to current areas of infrastructure capacity failures and the Environment Agency's responsibility for enforcement, to ensure appropriate environmental safeguards are put in place, and
- ii. Ensure the impacts of the Local Plan on water resources are addressed in line with development coming forward.

RESOLVED:

1. That the Water Cycle Study and comments received through the Regulation 19 Consultation be noted.
2. That Members note that further work is required with the Environment Agency, Natural England, South West Water and other stakeholders, to:
 - i. Agree a common understanding on the current position of East Devon's water infrastructure, particularly in relation to current areas of infrastructure capacity failures and the Environment Agency's responsibility for enforcement, to ensure appropriate environmental safeguards are put in place, and
 - ii. Ensure the impacts of the Local Plan on water resources are addressed in line with development coming forward.

52 **Cranbrook Category 4 Infrastructure Contributions**

The Assistant Director – Planning Strategy and Development Services presented the report, which sought the Committee's approval for the proposed approach to bidding for, and assessing bids relating to, Category 4 infrastructure necessary for the effective functioning of the expansion areas at Cranbrook.

The assessment criteria will follow the principles of the CIL bidding process, while remaining flexible to reflect the different stages of the projects, its eligibility, its need, value for money and deliverability as outlined in paragraph 16.

It was noted that the process and criteria for Category 4 contributions had been considered and endorsed by the Cranbrook Placemaking Group, and that the recommendation to Cabinet is that the proposed mechanism for allocating Category 4 infrastructure contributions be adopted for use by the Council.

The Chair reminded Members that questions should focus solely on the process for allocating Category 4 infrastructure funds and should not extend to wider issues relating to infrastructure at Cranbrook.

Questions included:

- A query was raised about how the list of projects was determined and the extent of input provided by Cranbrook Town Council. In response it was advised that the projects were set out in the Cranbrook Plan and the town council had a role in the Placemaking Group.
- Further information was required on sustainable transport enhancement. It was advised it could include bus improvements, walking and cycling routes and improvements along London Road for the expansion areas.
- Clarification was sought on the spending process. The Assistant Director – Planning Strategy and Development Services explained the need to balance differing priorities and maintain flexibility between what can be delivered at a given time and the overall priorities.

RESOLVED:

The Committee recommends to the Cabinet that the ‘Mechanism for the allocation of category 4 infrastructure contributions’ included at appendix 1, together with the assessment criteria questions at paragraph 16 for use by the council in relation to category 4 infrastructure contributions received from developments in the Cranbrook Plan Area are adopted.

RECOMMENDED TO CABINET:

The Committee recommends to the Cabinet that the ‘Mechanism for the allocation of category 4 infrastructure contributions’ included at appendix 1, together with the assessment criteria questions at paragraph 16 for use by the council in relation to category 4 infrastructure contributions received from developments in the Cranbrook Plan Area are adopted.

53

Habitat Regulation Non-Infrastructure Contributions

As Councillor Geoff Jung had declared an affects and prejudicial interest for this item, he did not take part in discussions or the vote.

The Assistant Director – Planning Strategy and Development Services presented the report on the Habitat Regulation Non-Infrastructure Contributions, outlining the financial contributions required from residential developments located within 10km of the Exe Estuary and East Devon Pebblebed Heaths. The report related to the Joint Mitigation Strategy agreed between this Council, Exeter City Council and Teignbridge District Council.

Members noted that in order to deliver the joint strategy it was essential to substantially increase the proposed revised non-infrastructure habitat mitigation charges as set out in table 3 paragraph 2.7 of total contribution required from future EDDC dwellings to £790.41 for the Exe Estuary, £804.64 for the Pebblebed Heaths and £825.41 for both.

Questions raised included:

- A query was raised about the need to review these figures on a regular basis to keep up with inflation. It was confirmed these figures would be reviewed regularly, noting that the last review occurred approximately 7 years ago.
- An explanation was requested on the rationale for the slight increase for both the Exe Estuary and Pebblebed Heaths and how will it work in allocating funding. In response the Assistant Director – Planning Strategy and Development Services

advised that as the joint contribution was across both sites it would mean effectively there would be only one payment and gave an example of one SANGS officer doing the work across both sites.

- Clarification was sought on whether this contribution was in addition to site specific contributions and will it apply to all homes across the district. The Assistant Director – Planning Strategy and Development Services explained that the charges only apply to dwellings within 10km of the protected habitats and are in addition to a proportion of CIL which is used to fund the infrastructure elements of the mitigation strategy while these charges relate to the non-infrastructure elements of the strategy.

RESOLVED

That the revised non-infrastructure habitat mitigation contributions as shown in table 3 within the report be adopted and required for all planning applications for residential development within the habitat mitigation zone received after 1 April 2026 be agreed.

54 **Response to Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System December 2025**

The Assistant Director – Planning Strategy and Development Services invited Members to consider, for submission, the proposed summary responses to the questions raised in the Government’s consultation on changes to the National Planning Policy Framework (NPPF) and wider reforms to the planning system.

The Assistant Director – Planning Strategy and Development Services highlighted several key proposed changes, including:

- Structural changes to the overall document;
- Specific amendments to policies across chapters, with a clearer distinction between plan-making policies and decision-making policies, intended to improve clarity and reduce misinterpretation when determining planning applications;
- The introduction of national decision-making policies;
- Support for urban densification, including consideration of low-density plots, upward extensions and in-fill developments.
- The introduction of ‘medium sites’, defined as sites delivering 10 to 49 homes or up to 2.5 hectares;
- A stronger emphasis on a ‘predict and provide’ approach to transport planning;
- Measures to secure a more diverse mix of homes, including a mandatory minimum requirement of 10% social rent on major developments
- A national minimum standard of 45% accessible and adaptable homes for new housing;
- Support for development around railway stations with mandatory minimum density requirements.

The Assistant Director – Planning Strategy and Development Services responded to questions and points raised by Members:

- **Q43 (page 63)** – A question was raised about the weight proposed to be given to the reuse of buildings and materials, and whether demolition would be treated as a last resort. Although the Council’s draft response does not specifically reference this issue, it was acknowledged as an important factor in addressing climate change and reducing carbon footprint. It was suggested that additional wording could be included to encourage the Government to strengthen this aspect if Members wished.

- **Chapter 6, Q48 (page 68)** – A request was made to strengthen the response in challenging the target-driven approach to housing need assessment, and to suggest that need should instead be based on the Council’s own assessments. The Assistant Director Planning Strategy and Development Services acknowledged the value of local assessments but noted that, in practice, they often involve significant expenditure on consultants to determine housing need.
- **Q53 (page 70)** – A suggestion was made to challenge the five-year housing land supply requirement, on the basis that it can lead to poor decisions and speculative applications. It was proposed that an additional comment could be included to state that this is not an appropriate mechanism, should Members wish to do so.
- **Land banking** – A query was raised about whether any question within the consultation related to land banking. It was confirmed that no such question appeared to be included.
- **Green wedges** – A query was raised about whether green wedges could be referenced in the Green Belt question to help reinforce their role within planning policy. It was noted that Green Belts are a national designation and carry the highest level of planning protection. While green wedges share some similarities in purpose, they carry significantly less weight when challenged.
- **Focus on urban areas** – It was observed that many of the consultation questions were framed with an urban focus, resulting in the need for the Council’s responses to be caveated.

Members thanked officers for producing a comprehensive report that clearly reflected the views of East Devon District Council.

RESOLVED:

That the contents of the consultation be noted and the responses to each consultation question included in this report be agreed for submission as the Council’s response.

Attendance List

Councillors present:

B Bailey
J Bailey
K Blakey
O Davey
P Faithfull
P Fernley
C Fitzgerald
M Howe (Vice-Chair)
G Jung
Y Levine
T Olive (Chair)
H Parr

Councillors also present (for some or all the meeting)

I Barlow
R Collins

Officers in attendance:

Ed Freeman, Assistant Director Planning Strategy and Development Services
Wendy Harris, Democratic Services Officer

Damian Hunter, Planning Solicitor

Councillor apologies:

P Hayward

B Ingham

D Ledger

Chairman

Date:



Report to: Strategic Planning Committee

Date of Meeting 5 May 2026

Document classification: Part A Public Document

Exemption applied: None

Review date for release Not applicable

East Devon Local Plan – Progress update report

Report summary:

This report provides an update on progress of the East Devon Local Plan. We had hoped that at this committee meeting we would be seeking committee endorsement for Submission for Examination. However, due to ongoing work streams, to include in respect of air quality concerns on the Pebblebed Heaths, the water cycle study and responding to increased traffic impacts on the trunk roads and specifically the M5 Motorway and its junctions this has not been possible. We would advise that we now plan to bring a report to committee later in the year seeking approval for Submission. What we do report on through this committee report, however, is feedback on the 2nd round of Regulation 19 plan consultation.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

- 1 That Strategic Planning Committee note the content of this report to specifically include the intent to bring a further report to this committee, later in 2026, recommending the Submission of the plan for Examination.
- 2 That Strategic Planning Committee note the consultation feedback report on the 2nd stage of Regulation 19 consultation.

Reason for recommendation:

To update on local plan progress and advise on consultation feedback.

Officer: Ed Freeman – Assistant Director Planning Strategy and Development Management, Tel: 01395 517519; e-mail – ed.freeman@eastdevon.gov.uk

Portfolio(s) (check which apply):

- Assets and Economy
- Communications and Democracy
- Council, Corporate and External Engagement
- Culture, Leisure, Sport and Tourism
- Environment - Nature and Climate
- Environment - Operational
- Finance

- Place, Infrastructure and Strategic Planning
- Sustainable Homes and Communities

Equalities impact Low Impact

There are no specific matters to highlight other than to note that the local plan will, at Submission, be supported by an equalities impact assessment.

Climate change Low Impact

Risk: Low Risk; In reporting for information on local plan progress there are no specific risks considerations to report on/highlight.

Links to background information Links to background documents are contained in the body of the report.

Link to [Council Plan](#)

Priorities (check which apply)

- A supported and engaged community
 - Carbon neutrality and ecological recovery
 - Resilient economy that supports local business
 - Financially secure and improving quality of services
-

1 Introduction

- 1.1 Committee will recall past work and the substantive progress that has been made on the local plan. A summary of past committee meetings is set out in Appendix 1 to this report - East Devon Local Plan – Where are we and how did we get here? Members will see that the committee has met on over 60 occasions to consider aspects of the Local Plan and its evidence base amounting to hundreds of hours of committee time in public session.
- 1.2 Committee will be aware that at this committee meeting the intent was that we would be seeking approval for the plan to be submitted for Examination. Unfortunately, due to the need to complete various ongoing work streams this has not been possible.
- 1.3 As a consequence, we are now proposing that Submission of the plan be delayed until later in 2026. We had previously reported that the transitional arrangements in the National Planning Policy Framework published in December 2024 meant that the plan had to be submitted by June 2026 to benefit from the transitional arrangements. These arrangements included provision to plan for 80% of the housing requirement figure under the new standard method included within that version of the NPPF and the ability to have the plan examined under the previous version of the NPPF. There had been some uncertainty over these provisions in recent months as MHCLG increasingly advised that plans could be submitted under these provisions until the end of 2026. This has now been clarified through publication of regulations under the Levelling-up and Regeneration Act 2023. Under transitional arrangements for plan making we have until 31 December 2026 to submit, but we would very much hope to do so sooner than this.

2 The 2nd round of Regulation 19 consultation

2.1 What we are able to report on is the completion of the 2nd round of Regulation 19 consultation. Committee will be aware that this consultation ran from Friday 28 November 2025 until Monday 26 January 2026 and highlighted changes to the plan from the first round of Regulation 19 consultation.

3 A feedback report for the second stage of Regulation 19 consultation includes the following summary:

The second Regulation 19 consultation on the East Devon Local Plan ran from Friday 28th November 2025 until Monday 26th January 2026 and invited representations on changes made since the previous publication stage. The consultation generated substantial engagement across strategic policies, settlement strategies, site allocations and development management policies.

Although the consultation was intended to focus on amendments made to the draft plan since the previous Regulation 19 stage, the vast majority of respondents chose to comment on the full content of the Local Plan. This broader approach to representations is therefore reflected throughout this report.

- Volume and Focus of Responses – As with the first regulation 19 consultation, the greatest volume of representations related to place based policies, particularly SD01 (Exmouth), which received over 1,700 responses overall. Within this chapter, individual site allocations attracted particularly high levels of engagement. Issues raised focused primarily on environmental constraints, infrastructure capacity, access, and deliverability.
- Housing Strategy - Housing provision remained a key issue across the consultation. SP02 (Levels of future housing development) attracted around 70 responses, with representations focusing on the overall housing requirement, the use of transitional arrangements, the stepped trajectory and reliance on later stage delivery. Related housing policies, including affordable housing, accessibility and self build requirements, also generated a significant number of responses.
- Spatial Strategy and Settlement Hierarchy - SP01 (Spatial Strategy) received around 45 responses, addressing the distribution of growth between the West End, towns and villages, and the role of individual settlements within the hierarchy. While the overall spatial approach attracted support, concerns were raised regarding the scale of growth in certain locations and the classification of specific settlements.
- Infrastructure and Viability - Key issues included water supply and wastewater capacity, transport impacts, health and education provision, and the timing and enforceability of infrastructure delivery. Viability concerns were also raised in relation to affordable housing, climate change policies and biodiversity net gain.
- Environmental Protection - Environmental policies generated sustained interest, particularly flooding, biodiversity, habitats and landscape protection. Flood related policies (AR01 and AR02) received over 20 responses collectively, while PB05 (Biodiversity Net Gain) alone attracted over 30 representations, focused on justification, viability impacts and consistency with national requirements.

- Sustainability Appraisal and Legal Compliance - A number of representations raised concerns with the Sustainability Appraisal, including the assessment of reasonable alternatives, consistency with site selection evidence and the application of mitigation principles.
- Neighbourhood Plans and Community Engagement - Some respondents raised concerns regarding the role of neighbourhood plans within the spatial strategy and the clarity and accessibility of consultation materials, with calls for greater transparency in how representations have informed revisions to the plan.
- Areas of Support - Support was expressed for the plan's overall objectives, including its emphasis on sustainable development, climate action and infrastructure led growth. A number of development management policies received support in principle, particularly those relating to design quality, green infrastructure, heritage and biodiversity protection. Several site allocations were also supported by landowners and developers as deliverable and capable of meeting identified needs.
- Comments on Changes Made to the Plan - A smaller but identifiable proportion of representations commented directly on changes made to the draft Local Plan since the previous Regulation 19 consultation. These comments focused mainly on site deletions or modifications, strengthened policy wording, and clarificatory amendments. Several respondents, including statutory bodies such as Historic England, National Highways and Devon County Council, explicitly supported the removal of individual site allocations where this was considered to address earlier concerns. Elsewhere, statutory consultees noted that revised wording—particularly in relation to heritage, archaeology and infrastructure—had resolved or partially addressed previous objections, while a small number of respondents identified improved clarity where additional wording had been introduced.

3.1 The full feedback report is available at Appendix 1.

3.2 It is highlighted that at the 2nd stage of Regulation 19 consultation we had explicitly sought comment on changes made to the plan since the first stage of consultation. Whilst comments on changes did feature in some representations, from some respondents, there were a great many comments that were not on changes but were in respect of overarching plan content, specifically comments (objections) to a number of sites allocated for development. Even though there were repetitions (to a lesser or greater extent) the feedback report reports on these as well as comments on changes.

3.3 It is not envisaged that further changes to the plan be made at this stage in response to the comments received. The plan has reached a stage of production where comments should and, where previously known, have been considered at earlier stages of plan production. Changes to the plan at this stage would require going back a stage and further consultation. In reality the comments made through the latest consultation should inform the examination of the plan and be considered through that mechanism.

4 On-going evidence and assessment work

4.1 The reason that we are not yet in a position to submit the plan for Examination is that there are still some ongoing evidence and assessment work that need completing. Key tasks and work areas are summarised below.

- 4.2 **West End focussed transport assessment** – given the scale of growth proposed in the West End of the district there has been a long-standing recognition for the need to address traffic congestion matters. Despite the inclusion of a range of sustainable travel measures, and the vision for high levels of internal trips at Marlcombe, traffic modelling shows adverse residual impacts on the road network in the area. There are particular concerns at the M5 and its junctions 29 and 30, the A30 Airport junction, and Clyst St Mary roundabout and the A3052/A376 approach to M5 J30. Technical assessment work has indicated that improvements are required at the A30 Airport junction to access Marlcombe. Work is ongoing, but all parties are confident that it will be possible with some comparatively modest changes/improvements at Junction 30 on the M5 to address congestion concerns for the time span of the local plan, up to 2042 and specifically to accommodate 3,300 dwellings at Marlcombe (as set out in plan policy).
- 4.3 Beyond 2042 and beyond 3,300 homes at Marlcombe will require further assessment and extra work which is ongoing. More significant changes to the physical road infrastructure and/or enhancements to walking, cycling and public transport will be required. Potential transport infrastructure improvements are part of ongoing, regular discussions with National Highways, Devon County Council, adjoining districts in the area, Network Rail, and train operators.
- 4.4 **Marlcombe viability testing** –Consultants have undertaken viability testing at and for Marlcombe to support the local plan and wider viability work. This has been prepared in parallel with an outline business case for the town to support an application for a Development Corporation to oversee and co-ordinate its delivery as previously reported to Cabinet. The work highlights that the previously stated aspiration for 40% affordable housing at the town is not achievable without significant grant funding. In light of this the plan will ultimately need to specify a minimum level of affordable housing (without grant funding) that would be a requirement. Given the advanced stage of plan production this would have to be put forward to the examination as a proposed main modification to the plan. Once the viability work is completed and available it will be reported to the committee with a recommendation for how this change is taken forward.
- 4.5 **Playing pitch and outdoor sports strategy** – on behalf of the Council and partners Strategic Leisure Limited have produced a new Playing pitch and outdoor sports strategy for East Devon. The strategy assesses the quality of existing provision and need for new provision, including in respect of need generated from local plan projected housing development. Whilst this strategy does not have fundamental impacts on the local plan or policy it will form supporting background evidence and also, amongst other matters, provides a policy framework to help secure pitch provision and enhancement against developments coming forward. As a wider corporate strategy this will be reported to the Council's Leisure Delivery Forum and then Cabinet in due course and will then be added to the evidence base to the Local Plan.
- 4.6 **Air quality impacts at the Pebblebed Heaths** – earlier assessment work has indicated that with extra development there will be more petrol and diesel vehicles on roads crossing the Pebblebed Heaths which is designated in the highest tier of wildlife

sites in England. The emissions from extra vehicles diesel and petrol vehicles, in the absence of mitigation, will lead to unacceptable biodiversity impacts.

- 4.7 Initial assessment work indicated the scale of the impacts to be very significant but at the time of writing further modelling work is nearing completion. This work includes revised assumptions including greater levels of electric vehicle uptake and use in-line with more recent national projections. With more electric vehicles (and fewer petrol and diesel) emissions fall and adverse impacts are lower. Initial suggestions from the consultant team are that the projected impacts from development have reduced as a result of this further modelling but at the time of writing officers are awaiting further feedback from the consultant team. A verbal update will be provided at the meeting.
- 4.8 **River Axe nutrient mitigation strategy** – there has been considerable time and effort already put into establishing means and mechanisms to deliver nutrient neutrality in respect of the mitigating impacts that new development would otherwise have on the River Axe Special Area of Conservation. This work has, however, not been pulled fully together into a single mitigation strategy, as needed to support local plan policy. The required new strategy is now nearing completion and will need to be ready by the time of plan submission. It will reflect the strategy set out in a successful bid to government for funding to deliver mitigation projects which has previously been reported to the committee.
- 4.9 **Water Cycle Study** –Further to the report to the committee meeting on the 3rd March officers continue to work with the consultants and the various agencies to agree a common understanding of the position on water infrastructure in the district. As previously reported the plan has been prepared alongside this emerging work and so it has informed the development strategy, and it is not envisaged that any changes to the plan will result from this work. It is however important to have an evidence base on water infrastructure that is agreed particularly with the statutory consultees where possible. A meeting with the consultants and Environment Agency to discuss these issues is arranged for later in the week of the committee meeting having unfortunately been delayed due to the limited availability of EA colleagues. It is hoped that this meeting will enable agreement to be reached on further work needed to complete a final version of the Water Cycle Study and timelines for doing so. Members will be kept advised of progress.
- 4.10 **Habitat Regulations Assessment** – local plans need to be subject to and informed by Habitat Regulation Assessment work. Earlier assessment work had identified specific need for further evaluation in respect of Pebblebed Heaths air quality and the River Axe Nutrient mitigation strategy, though also with some considerations relating to the water cycle study. The satisfactory completion of relevant assessments will allow for finalisation of the Habitat Regulation Assessment work and all being well with enable conclusions to be drawn that outstanding concerns are addressed.

5 Legal considerations in respect of plan submission deadlines

- 5.1 We had been working to a June 2026 as a submission date for the plan as under previous transitional arrangements, noting England is moving from the existing local plan making regime to a new one, there was some concern over possible ambiguity over the deadline to be met. There is, however, now clarity over the Submission deadline being 31 December 2026. Schedule 1, Regulation 4(4) in the [Levelling-up and Regeneration Act 2023 \(Commencement No. 11 and Saving and Transitional Provisions\) Regulations 2026](#) states we can submit the Local Plan by 31 December 2026. This date position is further clarified in paragraph 5.7 of [Explanatory Memorandum to The Town and Country Planning \(Local Planning\) \(England\) Regulations 2026](#) which confirms we have until 31 December 2026.

6 A new Local Development Scheme and conclusions

- 6.1 Whilst we have an absolute deadline to submit we would highlight a preference to do so earlier rather than later and would hope that this is achievable in the summer or autumn of 2026. We will keep committee informed on the progress of work.
- 6.2 We would highlight, however, that our latest [Local Development Scheme](#) (our plan for plan making) was approved in October 2025 and it is now out of date and will need refreshing. Once we have clarity of when submission can be achieved, we will bring a new Local development Scheme to committee for approval.
- 6.3 Assuming a plan submission later in 2026 we would expect adoption to be in 2028. Adoption in 2028, assuming Local Government Reorganisation goes ahead to scheduled timelines, may place the plan in the control of a superseding authority. It is, however, common and standard practice for new authorities coming into existence to carry forward plans from the authorities they supersede.

7 Duty to co-operate update

- 7.1 Members may be aware that the legal 'duty to co-operate' has recently been abolished (when the Town and Country Planning (Local Planning) (England) Regulations 2026 were enacted on 25/03/2026). However, the NPPF stresses the need to maintain effective co-operation throughout plan preparation on cross boundary issues, delivering an appropriate strategy and infrastructure planning. We are therefore continuing to prepare a co-operation statement and statements of common ground with relevant parties to support the submission of the plan and help to demonstrate that it is sound. These will be updated versions of the documents that supported the second Regulation 19 consultation ([CSD-10](#)).

Financial implications:

There are no direct financial implications identified within the report. (AB-21/04/2026)

Legal implications:

The legal issues have been identified within the report. (DH/002533-23/04/2026)

Appendix 1 - East Devon Local Plan – Where are we and how did we get here?

How did we get here?

Below is a table showing the key reports considered by SPC and the decisions made that have informed production of the Local Plan to date.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
20 th October 2020	Agenda for Strategic Planning Committee on Tuesday, 20th October, 2020, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members considered a review of the current Local Plan and concluded it is out of date. Agree to commence production of a new Local Plan. Agree to produce a new non-statutory joint strategy with Exeter, Teignbridge and Mid-Devon following the demise of GESP.
15 th December 2020	Agenda for Strategic Planning Committee on Tuesday, 15th December, 2020, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members agreed to consult on an issues and options document to define scope of the new Local Plan and seek views on key issues and options. Agree approach to site identification and the HELAA process Agree to run a call for sites alongside the Issues and Options consultation in Jan/Feb '21 Agreed scoping report for the sustainability appraisal to also be consulted on. Recommended to cabinet a budget of £300k for work on the new community proposals over next 3 years.
30 th March 2021	Agenda for Strategic Planning Committee on Tuesday, 30th March, 2021, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members considered an urban capacity study carried out for the larger towns noting that it yielded a supply of only 766 homes (i.e. less than 1 years housing land supply) and that these could come forward as windfall sites. The limited capacity within the existing built up areas was noted as was the need to find land outside of these areas to meet future development needs.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
27 th April 2021	Agenda for Strategic Planning Committee on Tuesday, 27th April, 2021, 2.00 pm - East Devon	<ul style="list-style-type: none"> • Members received an initial feedback report on the issues and options consultation. Key findings include: <ul style="list-style-type: none"> -Two thirds of respondents were supportive of the plan objectives -Wide support for net zero carbon requirement -Clear support for housing for all stages of life, jobs growth in all sectors, good design, protecting heritage and natural environment • Members agreed to producing a single Local Plan covering all key policy matters • Agreed objectives for the new Local Plan • Agreed that the Council Plan Vision inform the vision for the new Local Plan • Agreed that site developers and promoters be engaged in plan production through presentations at SPC
22 nd June 2021	Agenda for Strategic Planning Committee on Tuesday, 22nd June, 2021, 10.00 am - East Devon	<ul style="list-style-type: none"> • Members received details of the sites submitted in the various call for sites up to this point including maps showing their locations. • Members agreed amendments to the HELAA methodology that had previously been agreed under GESP. • Members agreed a topic paper on employment provision that set out current evidence and the further evidence needed as well as a number of key concepts to incorporate into the employment strategy of the plan. • A topic paper on Housing policy matters was agreed that set out the evidence requirements, highlighted key issues and Members agreed to not challenge the government standard method for calculating housing need. • A topic paper considering issues around the distribution of development and the need for

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
		a western quadrant focused approach due to constraints elsewhere was noted.
20 th July 2021	Agenda for Strategic Planning Committee on Tuesday, 20th July, 2021, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members considered a draft of the Role and Function of Settlement study which set out the 4 tiers of settlements and endorsed its use to inform plan production
7 th September 2021	Agenda for Strategic Planning Committee on Tuesday, 7th September, 2021, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members agreed a report setting out a structure for the Local Plan and proposing that Members consider a working draft in December 2021. The constitution and role of the HELAA panel was agreed. Members considered a topic paper on town centres and an approach to policies to widen the role of town centres and enhance them. A topic paper on bio-diversity policies and bio-diversity net gain was presented and Members endorsed seeking a net gain of at least 20%. A topic paper on landscape policies was presented and a series of actions and proposed policy principles were endorsed.
5 th October 2021	Agenda for Strategic Planning Committee on Tuesday, 5th October, 2021, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members endorsed a final draft of the Role and Function of Settlements work including the settlement hierarchy. Members considered a report on principles for drawing settlement boundaries and sought a further report setting out options for a criteria based policy on development adjacent to settlements. A topic paper on the importance of health and considerations was endorsed to inform plan production. Members noted a report on the on-going work to gather evidence and develop policies for sport and recreation.
9 th November 2021	Agenda for Strategic Planning Committee on	<ul style="list-style-type: none"> A topic paper on coastal change was noted and agreed to inform policy making.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
	Tuesday, 9th November, 2021, 2.00 pm - East Devon	<ul style="list-style-type: none"> A topic paper on approaches to tackling the climate emergency was noted.
14 th December 2021	Agenda for Strategic Planning Committee on Tuesday, 14th December, 2021, 9.30 am - East Devon	<ul style="list-style-type: none"> Members considered a working draft of the Local Plan and provided comments through a series of straw polls.
11 th January 2022	Agenda for Strategic Planning Committee on Tuesday, 11th January, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members gave further consideration to a working draft of the Local Plan and provided comments through a series of straw polls.
25 th January 2022	Agenda for Strategic Planning Committee on Tuesday, 25th January, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members heard a series of presentations from site developers and promoters of sites that had a mid-range score in officers initial assessment.
26 th January 2022	Agenda for Strategic Planning Committee on Wednesday, 26th January, 2022, 10.00 am - East Devon	<ul style="list-style-type: none"> Members heard a series of presentations from site developers and promoters of sites that had a mid-range score in officers initial assessment.
8 th February 2022	Agenda for Strategic Planning Committee on Tuesday, 8th February, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members gave further consideration to a working draft of the Local Plan and provided comments through a series of straw polls.
22 nd February 2022	Agenda for Strategic Planning Committee on Tuesday, 22nd February, 2022,	<ul style="list-style-type: none"> Members agreed a revised timetable for plan production that would see a draft plan consulted on in Autumn 2022.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
	9.30 am - East Devon	<ul style="list-style-type: none"> Members gave further consideration to a working draft of the Local Plan and provided comments through a series of straw polls. Members noted that there was a significant element of housing need for which suitable sites had not been identified. A series of options for addressing this including strategic growth at tier 4 settlements including Whimble and Feniton were discussed but no favoured option emerged. Members requested that a report on a potential further call for sites be brought to the committee to potentially increase the pool of sites.
8 th March 2022	Agenda for Strategic Planning Committee on Tuesday, 8th March, 2022, 2.00 pm - East Devon	<ul style="list-style-type: none"> As requested by Members a report including options for expanding the settlement hierarchy was considered but ultimately it was decided not to do so. As requested by Members a report on a further call for sites was considered and endorsed to be carried out in the spring.
5 th April 2022	Agenda for Strategic Planning Committee on Tuesday, 5th April, 2022, 10.00 am - East Devon	<ul style="list-style-type: none"> Members endorsed a proposed methodology for defining settlement boundaries.
3 rd May 2022	Agenda for Strategic Planning Committee on Tuesday, 3rd May, 2022, 2.00 pm - East Devon	<ul style="list-style-type: none"> Members received an interim HELAA report including assessment of sites submitted in the 2017 and 2021 call for sites.
12 th July 2022	Agenda for Strategic Planning Committee on Tuesday, 12th July, 2022, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered an update on plan production and noted the proposed criteria for further site assessment work. Members were advised that around 150 sites had been submitted in the 2022 call for sites but many were resubmissions from previous calls.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
		<ul style="list-style-type: none"> Members were advised that the additional sites could not be taken to a HELAA panel until August/September with a final HELAA report to come to committee asap after that.
9 th August 2022	Agenda for Strategic Planning Committee on Tuesday, 9th August, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members heard presentations from developers and site promoters for sites in and around the tier 1 and 2 settlements. Members considered officers assessments of the sites at tier 1 and 2 settlements. These included initial assessments of sites submitted in the Spring 2022 call for sites where appropriate.
6 th September 2022	Agenda for Strategic Planning Committee on Tuesday, 6th September, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Following comments by Members about potential to accommodate more homes on brownfield sites in Exmouth a report was presented which identified the significant constraints of Exmouth town centre particularly flooding which would prevent new homes in these locations. Members gave further consideration to officers assessments of the sites at tier 1 and 2 settlements and endorsed all of the preferred sites and 2nd choice sites for public consultation.
29 th September 2022	Agenda for Strategic Planning Committee on Thursday, 29th September, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members heard presentations from developers and site promoters for sites in and around the tier 3 and 4 settlements. Members considered officers assessments of the sites at tier 3 and 4 settlements. These included initial assessments of sites submitted in the Spring 2022 call for sites where appropriate. Members endorsed all of the preferred sites and 2nd choice sites for public consultation.
4 th October 2022	Agenda for Strategic Planning Committee on Tuesday, 4th October, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members agreed a draft consultation strategy with the service lead agreeing to bring a report to the 1st November meeting setting out options and resourcing implications of face to face consultation events.
7 th October 2022	Agenda for Strategic Planning	<ul style="list-style-type: none"> Members endorsed the draft local plan subject to agreed refinements to be

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
	Committee on Friday, 7th October, 2022, 9.30 am - East Devon	<p>presented and other updates to be presented at 1st November SPC.</p> <ul style="list-style-type: none"> Members resolved that consultation would not specify a level of growth in Feniton and Whimble but would instead seek views on the appropriate scale of growth and ask respondents to rank the site options in order of preference.
1 st November 2022	Agenda for Strategic Planning Committee on Tuesday, 1st November, 2022, 9.30 am - East Devon	<ul style="list-style-type: none"> Members heard presentations from developers and site promoters for sites in the west end of the district. Members considered a report assessing the 3 options for a new community and resolved to consult on this work as part of the draft plan consultation with option 1 identified as a preferred option and options 2 and 3 as alternatives. Members considered a final HELAA report and agreed for this to be published as part of the evidence for the draft plan. Members considered an amended and updated version of the draft Local Plan further to discussion at 7th October meeting and agreed it for consultation as well as agreeing the timescale for the consultation and details of face to face events.
14 th February 2023	Agenda for Strategic Planning Committee on Tuesday, 14th February, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the Economic Development Needs Assessment which details the employment land needs for the district and agreed for this to be used as evidence for the local plan.
7 th March 2023	Agenda for Strategic Planning Committee on Tuesday, 7th March, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members received an initial feedback report on the draft local plan consultation which highlighted key headlines of comments received through commonplace. Members considered a report on neighbourhood plan area housing requirements highlighting the requirement to give a requirement figure for housing in all neighbourhood plan areas and the options for a methodology to achieve this.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
9 th June 2023	Agenda for Strategic Planning Committee on Friday, 9th June, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members received a report setting out the current position on the local plan and future work to be completed. The report also highlighted a change to the Council's housing requirement figure which now stands at 910 homes per year.
21 st July 2023	Agenda for Strategic Planning Committee on Friday, 21st July, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members reviewed a feedback report on the first Reg 18 consultation on the Local Plan Members resolved that they receive a report on the risks with presenting a case that there are fundamental constraints in the district that mean that it cannot accommodate future housing needs in their entirety.
5 th September 2023	Agenda for Strategic Planning Committee on Tuesday, 5th September, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members received a report on housing numbers and the issues associated with meeting the requirements of the standard method housing need. The report also considers experience elsewhere and the constraints of the district. Members resolved to continue work on the local plan and provide sufficient housing to meet the government standard method. Members considered a report on the work programme for the new local plan and the implications of the Levelling up and Regeneration Bill in terms of deadlines for plan submission and adoption under the current system. A report on achieving suitable mitigation to deliver nutrient neutrality for developments in the River Axe catchment was considered. An update report on gypsy and traveller provision in the district was considered. A duty to co-operate update was considered.
3 rd October 2023	Agenda for Strategic Planning Committee on Tuesday, 3rd October, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the methodology for designating green wedges in the new Local Plan seeking amendments to the proposed approach to be brought to a future meeting.
31 st October 2023	Agenda for Strategic Planning Committee on Tuesday, 31st October, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered an addendum to the consultation feedback report for the Reg 18 consultation. A report on the timetable for plan making a new LDS was presented. Members considered a report on a new vision for the local plan which was deferred for consideration in Jan 2024.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
5 th December 2023	Agenda for Strategic Planning Committee on Tuesday, 5th December, 2023, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered an options appraisal for a new community to be allocated in the Local Plan resolving that option 1 was favoured.
9 th January 2024	Agenda for Strategic Planning Committee on Tuesday, 9th January, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered and agreed a revised vision for the new Local Plan Members considered an updated timetable for plan production
13 th February 2024	Agenda for Strategic Planning Committee on Tuesday, 13th February, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the designation of Green Wedges but did not agree that these were in accordance with Members wishes and a review of the approach was proposed. A report on designated neighbourhood area housing requirements was considered and Members agreed a preferred approach to this for consultation.
5 th March 2024	Agenda for Strategic Planning Committee on Tuesday, 5th March, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered an updated report on the timetable for the local plan. Members considered 13 additional potential housing sites that had been submitted late into the process and agreed some of them for inclusion. Members received a topic paper on town centres, retail and the sequential test An update on the playing pitch strategy was provided.
12 th March 2024	Agenda for Strategic Planning Committee on Tuesday, 12th March, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members agreed to set up a Local Plan Member Working Group Members considered and agreed potential employment sites for consultation as an addendum Reg 18 consultation Members considered the designated neighbourhood area housing requirements Members considered coastal preservation area policy boundaries for inclusion in the local plan
2 nd April 2024	Agenda for Strategic Planning Committee on Tuesday, 2nd April, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the merits of seeking a green belt designation in the west end of East Devon as previously requested by the committee and agree not to take this forward in this plan.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
30 th April 2024	Agenda for Strategic Planning Committee on Tuesday, 30th April, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members agreed to consult on an addendum Reg 18 consultation covering: <ul style="list-style-type: none"> Ø Designated Neighbourhood Area housing requirements Ø Potential additional housing allocations sites Ø Town centre retail boundaries Ø Proposed employment sites for allocation Ø Coastal Preservation Areas Members agreed green wedge boundaries to be included in the plan for consultation. Members agreed proposed changes to the clyst valley regional park for inclusion in the local plan Members noted the level Strategic Flood Risk Assessment work
4 th June 2024	Agenda for Strategic Planning Committee on Tuesday, 4th June, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members agreed an approach to committee consideration of the proposed sites for allocation in the local plan Members agreed an approach to identifying and considering major developments in the National Landscapes
15 th July 2024	Agenda for Strategic Planning Committee on Monday, 15th July, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered an updated local plan timetable Members considered a report on the approach to achieving zero carbon development in the local plan Members considered the approach to solar and wind farms in the local plan.
6 th August 2024	Agenda for Strategic Planning Committee on Tuesday, 6th August, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the implications of planning reforms on the local plan work programme. It was agreed to progress plan production under the proposed transitional arrangements of the draft new NPPF.
3 rd September 2024	Agenda for Strategic Planning Committee on Tuesday, 3rd September, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the housing requirement figure for the plan including discussion of an additional 10% supply headroom Members considered potential site allocations in Exmouth, Lympstone, Woodbury, Exton, Budleigh Salterton, Otterton further to consideration by the working group,
11 th September 2024	Agenda for Strategic Planning Committee on Wednesday, 11th	<ul style="list-style-type: none"> Members considered potential site allocation in Sidmouth, Sidbury, Newton Poppleford, Seaton, Colyton, Beer. Branscombe,

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
	September, 2024, 10.00 am - East Devon	Uplyme further to consideration by the working group.
20 th September 2024	Agenda for Strategic Planning Committee on Friday, 20th September, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered potential site allocation in Honiton, Dunkeswell, Axminster, Kilmington, Musbury, Hawkchurch, Chardstock further to consideration by the working group.
23 rd September 2024	Agenda for Strategic Planning Committee on Monday, 23rd September, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered potential site allocation in Ottery St Mary, Tipton St John, West Hill, Payhembury, Plymtree, Broadhembury, Feniton further to consideration by the working group.
1 st October 2024	Agenda for Strategic Planning Committee on Tuesday, 1st October, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered potential site allocation in Clyst St Mary, Whimple and employment sites further to consideration by the working group.
9 th October 2024	Agenda for Strategic Planning Committee on Wednesday, 9th October, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered redrafts of Chapters of the local plan
23 rd October 2024	Agenda for Strategic Planning Committee on Wednesday, 23rd October, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report on the status of Upottery and Woodbury Salterton in the settlement Hierarchy as requested by the committee at a previous meeting. Members considered the Gypsy and Traveller Accommodation Assessment. Members considered redrafts of Chapters of the local plan
29 th October 2024	Agenda for Strategic Planning Committee on Tuesday, 29th October, 2024, 9.00 am - East Devon	<ul style="list-style-type: none"> Members considered a feedback report on the addendum Reg 18 consultation Members reconsidered a number of potential site allocations that had been 'moved on' from at previous meetings.
1 st November 2024	Agenda for Strategic Planning Committee on Friday, 1st November, 2024,	<ul style="list-style-type: none"> Reconvened from 29th October 2024 to continue to reconsider a number of potential site allocations that had been 'moved on' from at previous meetings.

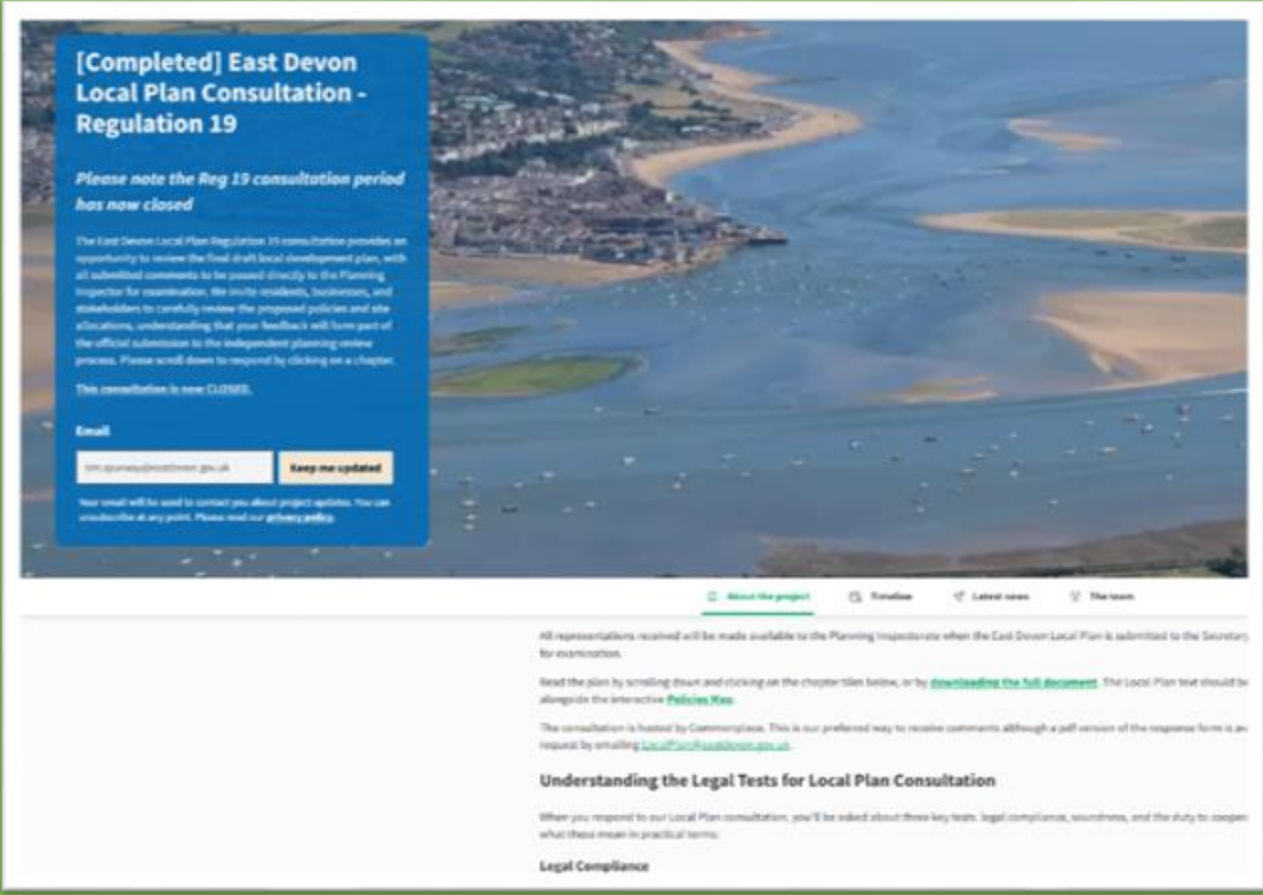
SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
	10.00 am - East Devon	
5 th November 2024	Agenda for Strategic Planning Committee on Tuesday, 5th November, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered redrafts of Chapters of the local plan
22 nd November 2024	Agenda for Strategic Planning Committee on Friday, 22nd November, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered redrafted policies for the designation of settlement boundaries and an evidence paper setting out the proposed boundaries which were agreed. Members considered redrafts of Chapters of the local plan Members considered a report on initial plan viability work
29 th November 2024	Agenda for Strategic Planning Committee on Friday, 29th November, 2024, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report setting out a proposed approach to reg 19 consultation and a proposed amendment to the Newton Poppleford settlement boundary as requested by Cabinet
11 th December 2024	Agenda for Strategic Planning Committee on Wednesday, 11th December, 2024, 9.00 am - East Devon	<ul style="list-style-type: none"> Members agreed the approach to the first Reg 19 consultation and some of the proposed content.
4 th February 2025	Agenda for Strategic Planning Committee on Tuesday, 4th February, 2025, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered a report summarising the changes in the new NPPF published December 2024 and the implications for plan making including the transitional arrangements. Members considered further documents for consultation at Reg 19 A new LDS was considered.
19 th May 2025	Agenda for Strategic Planning Committee on Monday, 19th May, 2025, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered the joint habitats mitigation strategy 2025-2030 An updated plan timetable was agreed.
8 th July 2025	Agenda for Strategic Planning Committee on Tuesday, 8th July, 2025, 10.00 am - East Devon	<ul style="list-style-type: none"> Members considered feedback from the first reg 19 consultation A new LDS was considered.

SPC Meeting Date	Hyperlink to agenda	Key reports/decisions (Note- from 7 th Sept 2021 up to and including the 7 th October 2022 meetings were consultative)
2 nd September 2025	Agenda for Strategic Planning Committee on Tuesday, 2nd September, 2025, 10.00 am - East Devon	<ul style="list-style-type: none"> • Members reconsidered the settlement boundary for Newton Poppleford following a resolution of Council. • Members considered a report on those site allocations that had received the most objections through the Reg 19 consultation and resolved to retain them all apart from Honi_12 • Members considered gypsy and traveller accommodation needs • Members considered the approach to wind farms and turbines
30 th September 2025	Agenda for Strategic Planning Committee on Tuesday, 30th September, 2025, 10.00 am - East Devon	<ul style="list-style-type: none"> • Members considered a series of documents on Marlcombe new town that would form part of a second reg 19 consultation • Members considered proposed coastal change management areas following revisions to them in light of consultation feedback
25 th November 2025	Agenda for Strategic Planning Committee on Tuesday, 25th November, 2025, 10.00 am - East Devon	<ul style="list-style-type: none"> • Members agreed documents and the approach to a second reg 19 consultation
3 rd March 2026	Agenda for Strategic Planning Committee on Tuesday, 3rd March, 2026, 10.00 am - East Devon	<ul style="list-style-type: none"> • Members considered an update report on local plan production following completion of the 2nd Reg 19 consultation. • Members considered the Water Cycle Study and consultation responses to it received from statutory bodies.

Draft Feedback Report

East Devon Local Plan (Regulation 19)

Consultation (28 Nov 2025 to Monday 26 Jan 2026)



[Completed] East Devon Local Plan Consultation - Regulation 19

Please note the Reg 19 consultation period has now closed

The East Devon Local Plan Regulation 19 consultation provides an opportunity to review the final draft local development plan, with all submitted comments to be passed directly to the Planning Inspector for examination. We invite residents, businesses, and stakeholders to carefully review the proposed policies and site allocations, understanding that your feedback will form part of the official submission to the independent planning review process. Please scroll down to respond by clicking on a chapter.

This consultation is now **CLOSED**.

Email

Your email will be used to contact you about project updates. You can unsubscribe at any point. Please read our [privacy policy](#).

[About the project](#) [Timeline](#) [Latest news](#) [The team](#)

All representations received will be made available to the Planning Inspectorate when the East Devon Local Plan is submitted to the Secretary for examination.

Read the plan by scrolling down and clicking on the chapter tiles below, or by [downloading the full document](#). The Local Plan text should be alongside the interactive [Policies Map](#).

The consultation is hosted by Commonglass. This is our preferred way to receive comments although a pdf version of the response form is available by emailing LocalPlan@eastdevon.gov.uk.

Understanding the Legal Tests for Local Plan Consultation

When you respond to our Local Plan consultation, you'll be asked about three key tests: legal compliance, soundness, and the duty to cooperate. What these mean in practical terms:

Legal Compliance

Executive summary

The second Regulation 19 consultation on the East Devon Local Plan ran from Friday 28th November 2025 until Monday 26th January 2026 and invited representations on changes made since the previous publication stage. The consultation generated substantial engagement across strategic policies, settlement strategies, site allocations and development management policies.

Although the consultation was intended to focus on amendments made to the draft plan since the previous Regulation 19 stage, the vast majority of respondents chose to comment on the full content of the Local Plan. This broader approach to representations is therefore reflected throughout this report.

- **Volume and Focus of Responses** – As with the first regulation 19 consultation, the greatest volume of representations related to place-based policies, particularly SD01 (Exmouth), which received over 1,700 responses overall. Within this chapter, individual site allocations attracted particularly high levels of engagement. Issues raised focused primarily on environmental constraints, infrastructure capacity, access, and deliverability.
- **Housing Strategy** - Housing provision remained a key issue across the consultation. SP02 (Levels of future housing development) attracted around 70 responses, with representations focusing on the overall housing requirement, the use of transitional arrangements, the stepped trajectory and reliance on later-stage delivery. Related housing policies, including affordable housing, accessibility and self-build requirements, also generated a significant number of responses.
- **Spatial Strategy and Settlement Hierarchy** - SP01 (Spatial Strategy) received around 45 responses, addressing the distribution of growth between the West End, towns and villages, and the role of individual settlements within the hierarchy. While the overall spatial approach attracted support, concerns were raised regarding the scale of growth in certain locations and the classification of specific settlements.
- **Infrastructure and Viability** - Key issues included water supply and wastewater capacity, transport impacts, health and education provision, and the timing and enforceability of infrastructure delivery. Viability concerns were also raised in relation to affordable housing, climate change policies and biodiversity net gain.
- **Environmental Protection** - Environmental policies generated sustained interest, particularly flooding, biodiversity, habitats and landscape protection. Flood-related policies (AR01 and AR02) received over 20 responses collectively, while PB05 (Biodiversity Net Gain) alone attracted over 30 representations, focused on justification, viability impacts and consistency with national requirements.

- **Sustainability Appraisal and Legal Compliance** - A number of representations raised concerns with the Sustainability Appraisal, including the assessment of reasonable alternatives, consistency with site-selection evidence and the application of mitigation principles.
- **Neighbourhood Plans and Community Engagement** - Some respondents raised concerns regarding the role of neighbourhood plans within the spatial strategy and the clarity and accessibility of consultation materials, with calls for greater transparency in how representations have informed revisions to the plan.
- **Areas of Support** - Support was expressed for the plan’s overall objectives, including its emphasis on sustainable development, climate action and infrastructure-led growth. A number of development management policies received support in principle, particularly those relating to design quality, green infrastructure, heritage and biodiversity protection. Several site allocations were also supported by landowners and developers as deliverable and capable of meeting identified needs.
- **Comments on Changes Made to the Plan** - A smaller but identifiable proportion of representations commented directly on changes made to the draft Local Plan since the previous Regulation 19 consultation. These comments focused mainly on site deletions or modifications, strengthened policy wording, and clarificatory amendments. Several respondents, including statutory bodies such as Historic England, National Highways and Devon County Council, explicitly supported the removal of individual site allocations where this was considered to address earlier concerns. Elsewhere, statutory consultees noted that revised wording—particularly in relation to heritage, archaeology and infrastructure—had resolved or partially addressed previous objections, while a small number of respondents identified improved clarity where additional wording had been introduced.

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The approach to consultation

The approach to consultation for the second regulation 19 followed an almost identical process to the initial regulation 19 consultation held between Thursday 13th February 2025 and Monday 31st March 2025.

To ensure consistency and alignment with national requirements, we adopted a standardised question format for the Regulation 19 consultation, based on the model form provided by the Planning Inspectorate. This format is designed to address whether the plan has been prepared in accordance with legal and procedural requirements and whether it meets the legal tests of soundness set out in the National Planning Policy Framework (NPPF). However, we recognise that the technical and legal language used in these questions may not be easily accessible to all members of the public.

Each submission followed a consistent format. Respondents were first asked to identify the part of the plan they were commenting on. They were then invited to explain why they supported or objected to that part of the plan, specifically in relation to the legal and procedural requirements and tests of soundness, and to suggest any changes they believed were necessary to be made. The only additional question added was the option to tick whether the comments are related to a change made in the plan from the first regulation 19 consultation to the second regulation 19 consultation.

This report reflects the latter two elements of each submission: the reasons for support or objection are summarised under **Main Issues**, while the suggested changes are captured under **Calls for**.

The scale of engagement was similar to the initial regulation 19 consultation. We received a total of 3,114 responses compared with 3,510 responses in the first, comprising almost 1 million words. Around 35% of these were submitted outside the Commonplace platform and had to be manually uploaded by officers to ensure all responses were captured in a single, consistent database.

The report breaks down the total number of responses made by policy and by site. It is noted that the two figures may not add up, as people often commented on multiple sites or topics in a single submission. As in the first regulation 19 consultation The most commented-on policy by a considerable margin was Policy SD01, specifically the proposed allocation of site Exmo_20. This site attracted a high volume of responses, again including petitions objecting to its inclusion. These are summarised in the relevant section of this report.

Artificial Intelligence (AI) was utilised widely during the preparation of this report.

- **AI System Used:** Microsoft Copilot.
- **Source Material:** The original response submissions received via commonplace, minus personal information.
- **Scope of AI Use:** To summarise responses and pull out main issues
- **Images and Video:** No images or video of people, property, objects, or places have been created or altered using AI in the preparation of this Local Plan.
- **Date of AI Use:** November 2024.
- **Responsibility and Accuracy:** East Devon District Council retains full responsibility for the factual accuracy of all content. The use of AI has been conducted responsibly and lawfully, in accordance with relevant data protection and copyright legislation. No personal information was processed during the use of AI and all outputs have been thoroughly checked before publication.

A number of site promoters also submitted representations commenting on or advocating for the inclusion of sites not currently allocated in the draft plan. These submissions typically set out the perceived benefits of their proposed sites. A non-exhaustive list of these is provided below:

- Lymp_09 & Lymp_10a
- Honi_01 / Honi_15
- GH/ED/26
- Sidm_02 / Sidm_35
- Brcl_07
- Brhe_07
- Kilm_05
- Whim_12
- Whim_13

Response summaries

1. Introduction

Total responses: 52

Main Issues:

- Some respondents highlight factual inaccuracies or omissions in the introductory text, including incorrect references to neighbourhood plan coverage and missing context on minerals and natural environment (Individuals).
- Several parties express concerns that the plan-making process—particularly the use of a second Regulation 19 consultation—raises questions about transparency, evidence availability and procedural fairness (Planning consultants, Landowners/Developers, Community Groups, Individuals).
- Representations raise significant issues with transitional arrangements, with some arguing that the Council is attempting to rely on lower housing requirements despite substantial changes between Regulation 19 drafts (Planning consultants, Landowners/Developers).
- Multiple respondents consider the Council’s approach to the Duty to Cooperate inadequate, citing insufficient evidence of cross-boundary engagement or unresolved issues such as unmet need (especially for housing), air quality, and strategic site impacts (Individuals; Community Groups; Planning consultants).
- A number of submissions challenge the adequacy, availability or consistency of the supporting evidence base, particularly relating to infrastructure delivery, water quality, viability, and environmental assessments (Planning consultants, Landowners/Developers, Community Groups).
- Some respondents note that key environmental considerations—such as water environment, biodiversity enhancement, and native species requirements—are underrepresented or missing from the introductory material (Public body – Devon Wildlife Trust; Public body – Natural England; Community Groups).
- Concerns are raised about the plan period not covering 15 years and its alignment with national policy, with some arguing that the proposed timescale is unrealistic or inconsistent with NPPF requirements (HBF; Individuals; Planning consultants).
- A number of individuals and community groups express frustration with perceived lack of genuine public engagement, describing consultation processes as one-way or dismissive of public input (Individuals, Community Groups, Parish/Town Councils).
- Several respondents highlight inconsistencies or errors in mapping, including settlement boundary changes and missing designations, which they argue undermine the soundness of the plan (Individuals, Parish/Town Councils, Landowners/Developers).

Calls For

- Correct factual errors and improve accuracy of introductory content, ensuring clear and consistent presentation of local context (Individuals).
- Improve transparency regarding transitional arrangements and the rationale for undertaking a second Regulation 19 consultation, including clear explanation of implications for housing requirements (Planning consultants, Landowners/Developers).
- Publish all outstanding evidence base documents and ensure alignment between policy wording, infrastructure requirements and supporting studies (Planning consultants, Landowners/Developers, Community Groups).
- Strengthen references to environmental responsibilities, including biodiversity enhancement, the importance of the water environment, and the role of SuDS and climate adaptation measures (Public body – Devon Wildlife Trust; Public body – Natural England; Community Groups).
- Extend or revisit the plan period to ensure compliance with national policy expectations for long-term strategic planning (HBF; Planning consultants).
- Improve community involvement and demonstrate how public input has shaped plan development, addressing concerns about trust and engagement (Individuals, Community Groups, Parish/Town Councils).
- Review and correct mapping inconsistencies (e.g., settlement boundaries, international and national site designations) to ensure clarity and soundness (Individuals, Parish/Town Councils, Landowners/Developers).

2. The Vision

Total responses: 26

Main Issues

- Several respondents consider elements of the vision unrealistic or internally inconsistent, highlighting tensions between growth, environmental protection and the scale/location of proposed development (Individuals, Planning consultants, Landowners/Developers).
- Some representations state that the vision embeds policy conflict by promoting protection of landscape and character while simultaneously proposing significant development in areas constrained by National Landscapes or lacking infrastructure (Planning consultants, Individuals).
- Concerns are raised that the vision does not sufficiently recognise or prioritise meeting housing needs, with multiple parties stating that references to growth are vague or insufficiently aligned with national policy expectations on housing delivery (Landowners/Developers, HBF, Planning consultants).
- A number of respondents consider the vision environmentally unbalanced, either giving undue weight to environmental protection at the expense of housing/economic needs, or failing to acknowledge key environmental responsibilities such as European site

designations and integrated water management (Community Groups – Lypstone Water Quality Group, Individuals).

- Some respondents argue that the vision is undermined by omissions in the supporting diagrams and tables, particularly Figure 3 and Table I, which are said to omit key development numbers or misrepresent settlement tiers (Individuals, Community Groups).
- There are concerns that the vision does not fully reflect the climate and biodiversity emergencies, with requests for clearer commitments to integrated water management, SuDS and biodiversity enhancement (Community Groups – Lypstone Water Quality Group, Community Groups – Otter Valley Association).
- Several individuals raise issues about the impact of large-scale growth (particularly Marlcombe) on infrastructure, landscape and local character, stating that the vision does not realistically address the consequences (Individuals, Community Groups).
- Some respondents request greater clarity on the relative weighting of objectives, particularly regarding National Landscape protection, arguing that references in NPPF require stronger emphasis (Planning consultants – Legal Representatives, Individuals).

Calls For

- Provide a more realistic, evidence-based and internally consistent vision that clearly reconciles growth, environmental constraints and infrastructure capacity (Planning consultants, Individuals).
- Strengthen references to meeting full housing needs and reflect national policy requirements clearly within the vision (Landowners/Developers, HBF, Planning consultants).
- Adjust the vision to balance environmental protection with deliverability, including clearer recognition of European site designations, biodiversity priorities and integrated water management/SuDS requirements (Public body – Historic England, Community Groups – Lypstone Water Quality Group, Community Groups).
- Update supporting diagrams and tables (e.g., Figure 3, Table I) to include full development numbers for all tiers and ensure accurate, transparent presentation of spatial strategy elements (Individuals, Community Groups).
- Reconsider the wording of objectives to ensure that their relative weight is properly expressed, particularly in relation to National Landscape protection and climate/biodiversity obligations (Planning consultants – Individuals).
- Revisit the framing of growth locations—especially in constrained landscapes—to ensure the vision aligns with realistic infrastructure capacity, landscape protection and the plan’s stated aims (Planning consultants, Individuals, Community Groups).

3. Spatial Strategy

Total responses: 242

SP01: Spatial strategy

Total responses: 47

Main Issues

- There is broad support for focusing strategic growth in the West End, including for extra sites such as land at Addlepool Farm, though several parties seek a more balanced approach that does not under-weight Exmouth's role as Principal Centre (Planning consultants, Landowners/Developers).
- Some representations argue Exmouth's share of growth is too low relative to its size and services, requesting uplift within the spatial hierarchy (Planning consultants, Landowners/Developers).
- Community groups in National Landscape areas (notably Sidmouth) object to references to "significant development," contending that growth should be limited to locally identified needs to conserve landscape character (Community Groups).
- Statutory consultees flag evidence and infrastructure concerns, including deficiencies in the Water Cycle Study affecting the plan's soundness (Public body – Environment Agency) and the need to fully consider impacts on the Strategic Road Network from concentrated West End growth (Public body – National Highways).
- Multiple respondents say Habitats Regulations considerations should underpin **all** strategic policies (not just SP07), highlighting proximity to European sites and constraints around Exmouth and the Pebblebed Heaths (Individuals).
- Developers/landowners and their planning consultants generally support the overall distribution but call for clearer articulation of the housing pipeline and flexibility/contingency if the new community is delayed (Planning consultants, Landowners/Developers).
- Move significant levels of housing away from National Landscapes and into the West End to meet Exeter's unmet needs (Planning consultants, Landowners/Developers).
- Support the spatial strategy for significant development at Honiton, but the level of actual provision is too low, and should include site at Heathfield Manor (Planning consultants, Landowners/Developers).
- The HBF considers the strategy unsound without additional allocations and clearer distribution/delivery detail, and questions reliance on transitional arrangements (HBF).
- Several representations say certain sustainable villages (e.g., Kilmington, Woodbury, Whimple) are under-scored in the hierarchy and should have an elevated role given services and connectivity (Planning consultants, Landowners/Developers).
- Potential for Marlcombe to have long term effects on the operation of the Devon County Showground (Devon County Agricultural Association).
- Minor drafting and evidence points are raised, including correcting erroneous evidence library references within SP01's footnotes (Planning consultants, Landowners/Developers).

Calls For

- Retain and/or increase the West End focus but give Exmouth greater weighting and/or enable earlier delivery on allocations capable of front-loading supply (Planning consultants, Landowners/Developers).
- Elevate the role of the most sustainable villages (e.g., review the designation of Whimple) so the hierarchy and distribution reflect services, connectivity and growth potential (Planning consultants, Landowners/Developers).
- Embed explicit Habitats Regulations/European site tests across **all** strategic policies and align allocations accordingly, particularly near the Pebblebed Heaths (Individuals; Public body – Environment Agency).
- Ensure SRN impacts and mitigation are fully evidenced for West End growth and new settlement proposals (Public body – National Highways).
- Provide clearer policy wording on distribution and a transparent housing delivery pipeline, with contingency if the new settlement slips, including identification of additional or reserve sites (HBF; Planning consultants, Landowners/Developers).
- Re-balance growth away from National Landscapes and towards less constrained areas, protecting landscape character and focusing on brownfield/intensification where appropriate (Landowners/Developers, Community Groups).
- Correct evidence references (e.g., footnote document IDs) and provide clearer audit trails for SA/site-selection changes referenced in the justification (Planning consultants, Individuals).

SP02: Levels of future housing development

Total responses: 72

Main Issues

- A number of individual respondents object to the overall scale of development proposed, citing impacts on character, landscape and infrastructure capacity (Individuals).
- Many respondents argue the proposed housing requirement is unjustified and too low, noting reliance on transitional arrangements results in delivering only around 80% of objectively assessed need (Planning consultants, Landowners/Developers, HBF, Individuals).
- Concerns are raised about the stepped trajectory, seen as deferring housing delivery to later years, worsening unmet need and risking plan effectiveness (Planning consultants, Landowners/Developers, Community Groups).
- Some respondents argue that the scale of employment land provision elsewhere in the Plan is not supported by sufficient housing delivery to provide an adequate labour supply, potentially undermining economic strategy objectives (Planning consultants, Landowners/Developers).

- Some bodies emphasise the need to accommodate unmet need from neighbouring authorities, notably Torbay, which cannot meet its own Local Housing Need (Public body – Torbay Council).
- Respondents say reliance on the new community (Marlcombe) for later delivery is risky due to uncertainties around timing, infrastructure and viability (Planning consultants, Individuals, Community Groups).
- Questions are raised about whether the plan period meets the minimum 15-year requirement from adoption, with suggestions the period may need extending (Planning consultants).

Calls For

- Increase the housing requirement to fully reflect local housing need and avoid under-provision (Planning consultants, Landowners/Developers, HBF).
- Remove the stepped trajectory and adopt a consistent annual requirement across the plan period (Planning consultants, Landowners/Developers).
- Ensure alignment between economic growth forecasts and housing numbers, adjusting one or both if needed (Planning consultants, Landowners/Developers).
- Address unmet need from Torbay and ensure robust cross-boundary dialogue (Public body – Torbay Council).
- Extend the plan period to ensure it covers a full 15 years post-adoption (Planning consultants).
- Increase allocations and early-years delivery to reduce over-reliance on Marlcombe (Planning consultants).

SP03: Housing requirement by Designated Neighbourhood Area

Total responses: 15

Main Issues

- Discrepancies are reported between DNA housing requirements and allocations (e.g. Honiton numbers not matching distribution in SD policies) (Planning consultants, Landowners/Developers).
- Some respondents say figures for certain areas such as Lypstone and Ottery St Mary represent unrealistic increases relative to existing scale and infrastructure (Individuals, Parish/Town Councils, Community Groups).
- Concerns raised that reliance on Neighbourhood Plans for delivery is risky because neighbourhood planning is voluntary and uncertain (HBF, Planning consultants).
- Several representations question evidence and consistency around calculations, including treatment of completions since 2020 and relationship to settlement hierarchy (Individuals, Planning consultants).
- Some stakeholders argue more growth should be directed to sustainable settlements such as Woodbury and Axminster (Landowners/Developers, Planning consultants).

Calls For

- Clarify the relationship between DNA requirements, SD-policy allocations, and existing commitments (Planning consultants, Landowners/Developers).
- Review housing numbers for areas showing disproportionate increases (Individuals, Parish/Town Councils, Community Groups).
- Reduce reliance on Neighbourhood Plans by allocating sufficient sites in the Local Plan itself (HBF, Planning consultants).
- Provide transparent calculations including completions since 2020 (Individuals).
- Allocate additional sites in sustainable rural centres (Planning consultants, Landowners/Developers).

SP04: Employment provision and distribution strategy

Total responses: 11

Main Issues

- Objections to allocations within National Landscape areas and calls to redirect employment growth to the West End where demand is strongest (Planning consultants, Landowners/Developers, Community Groups).
- Several state employment land provision is either excessive, unrealistic in timescale (e.g. Marlcombe employment), or insufficiently flexible to meet market needs (Planning consultants, Landowners/Developers).
- Concerns raised about reliance on distributing E(g)(iii) uses within mixed-use housing allocations without evidence they suit operational requirements (Planning consultants).
- Some respondents support allocations but seek a wider range of employment uses beyond B2/B8 and E(g) to reflect modern economic sectors (Landowners/Developers, Planning consultants).
- National Highways highlights significant SRN impacts arising from West End employment growth (Public body – National Highways).

Calls For

- Remove or reduce allocations in National Landscapes and redirect land to West End locations such as Hill Barton and Sowton village (Planning consultants, Landowners/Developers).
- Increase flexibility within the policy to allow a wider range of employment uses beyond traditional classes (Planning consultants, Landowners/Developers).
- Provide evidence of deliverability for allocations linked to new settlements (Planning consultants).
- Align distribution of jobs and homes to reduce labour-supply shortages (Planning consultants).
- Ensure SRN capacity impacts are properly assessed and mitigation secured (Public body – National Highways).

SP05: Development inside Settlement Boundaries

Total responses: 7

Main Issues

- Objections to boundary changes at Bystock Village in Exmouth, citing factual inaccuracies, conflict with ENP heritage policies, and lack of evidence (Individuals; Community Groups; Parish/Town Councils).
- Multiple representations argue the settlement boundary methodology has been misapplied, especially criteria B2/B3 (Individuals; Planning consultants).
- Concerns that SP05 restricts Neighbourhood Plans from allocating sites beyond boundaries, conflicting with national policy ("general conformity" tests) (Planning consultants; Landowners/Developers).
- Concerns about potential coalescence of Seaton and Colyford and excessive development pressure (Individuals; Parish/Town Councils).
- Some seek removal of unnecessary wording in SP05 that duplicates already-required policy considerations (Landowners/Developers).

Calls For

- Reverse/amend boundary changes lacking robust evidence, especially Bystock Village (Individuals; Parish/Town Councils; Community Groups).
- Correct errors in applying settlement boundary criteria and ensure consistency with Neighbourhood Plan protections (Individuals; Community Groups).
- Revise policy text to allow Neighbourhood Plans to allocate land outside boundaries where justified (Planning consultants; Landowners/Developers).
- Remove unnecessary explanatory text duplicating statutory requirements (Landowners/Developers).

SP06: Development beyond Settlement Boundaries

Total responses: 7

Main Issues

- Many say the policy is excessively restrictive and prevents sustainable sites (especially employment opportunities) from progressing despite being adjacent to existing allocations (Planning consultants; Landowners/Developers).
- Tension identified between SP05 and SP06 around whether Neighbourhood Plans can expand settlement boundaries (Planning consultants).
- Policy does not sufficiently acknowledge exceptions in the NPPF for rural employment, rural exception housing, and isolated homes (Planning consultants; Landowners/Developers).
- Individuals argue the blanket restriction could harm rural economies (Individuals).

Calls For

- Add flexibility allowing sustainably located employment/housing proposals just outside boundaries (Planning consultants; Landowners/Developers).
- Clarify interaction between SP05, SP06 and NPPF rural exceptions (Planning consultants).
- Avoid rigid restrictions that inhibit rural economic activity (Individuals; Landowners/Developers).

SP07: Delivery of infrastructure

Total responses: 35

Main Issues

- Major concerns over insufficient water/wastewater capacity evidence, especially for Honiton, Feniton, Otter Valley and Marlcombe (Public body – Environment Agency; Community Groups; Individuals).
- Calls for Habitats Regulations screening and European site protection to be consistently applied across all strategic policies, not only SP07 (Individuals; Community Groups).
- Requests for clearer viability flexibility where infrastructure obligations threaten deliverability (Planning consultants; Landowners/Developers).
- NHS Devon ICB states primary care infrastructure needs are not properly reflected in the IDP or allocations (Public body – NHS Devon ICB).
- National Highways requests earlier clarity on strategic transport impacts, including SRN interventions (Public body – National Highways).

Calls For

- Provide fuller water/wastewater evidence and ensure development phasing aligns with existing network capacity (Public body – Environment Agency; Community Groups).
- Embed Habitats Regulations considerations into all SP policies (Individuals; Community Groups).
- Introduce viability-based flexibility where needed (Planning consultants; Landowners/Developers).
- Strengthen enforceability of health infrastructure requirements and formally identify NHS Devon ICB as a delivery partner (Public body – NHS Devon ICB).
- Update IDP and strategic highway evidence to properly reflect plan-wide needs (Public body – National Highways).

SP08: Phased Delivery of Infrastructure and Services

Total responses: 11

Main Issues

- Some support the intent but say the wording is unclear or overly prescriptive, especially regarding which services must reach parcel boundaries (Landowners/Developers; Planning consultants).
- Environment Agency states the Water Cycle Study is not robust enough to justify phased development assumptions (Public body – Environment Agency).
- Community groups raise concerns about wastewater capacity, especially for the Otter Valley, arguing upgrades are needed before additional homes (Community Groups).
- NHS Devon ICB says health infrastructure obligations are insufficiently defined (Public body – NHS Devon ICB).
- Devon County Council supports stronger active-travel and internal parcel-to-parcel transport requirements (Public body – Devon County Council).

Calls For

- Streamline and clarify policy wording, especially around single/multiple developers and service installation requirements (Landowners/Developers).
- Specify which infrastructure elements must be extended to parcel boundaries (Planning consultants; Landowners/Developers).
- Strengthen wastewater/water infrastructure requirements and align delivery with available capacity (Public body – Environment Agency; Community Groups).
- Include explicit health infrastructure phasing obligations (Public body – NHS Devon ICB).
- Ensure robust and continuous active-travel and transport connectivity between parcels (Public body – Devon County Council).

4. Development in the West End

Total responses: 116

WS01: Development of a second new community east of Exeter

Total responses: 55

Main Issues

- Many respondents consider the delivery trajectory unrealistic, with insufficient evidence that c.3,300 homes can be delivered by 2042 given landownership complexity, infrastructure requirements and lead-in times (Planning consultants; Landowners/Developers; HBF).
- Concerns raised about over-reliance on Marlcombe to meet housing needs, creating risk if delivery falls behind and reducing resilience in the overall spatial strategy (Planning consultants; Landowners/Developers; HBF).
- Infrastructure evidence is viewed as incomplete, particularly on water supply, wastewater treatment, primary care, emergency services, and the scale and feasibility

- of education provision (Public body – Environment Agency; Public body – NHS Devon ICB, Devon and Cornwall Police, Devon and Somerset Fire and Rescue Service).
- Concern over the level of detail currently available for identified transport infrastructure, and the funding and delivery strategy for necessary strategic road network (SRN) improvements (Public body – National Highways, Network Rail).
- The masterplan is seen as unclear in places and lacking detail on responsibilities, flexibility and phasing, with concern it may not be robust enough to guide such a large-scale allocation (Planning consultants; Landowners/Developers).
- Proposed densities (45dph site-wide and up to 75dph in the town centre) are viewed as potentially unrealistic given topography, viability and placemaking objectives (Planning consultants; Landowners/Developers).
- Natural England and others raise concerns about SANG corridors, noise-affected locations near the A30/airport and the unsuitability of Cats Copse for SANG designation (Public body – Natural England).
- Clarity is requested on the affordable housing expectations, with concerns that a 40% aspiration may be unviable (Planning consultants; Landowners/Developers).
- The additional land required to form part of the proposed new community to deliver at least 10,000 dwellings should be considered to ensure a comprehensive and coordinated approach to placemaking is undertaken. Land suggested includes to the east of the proposed new community and comprising c.64 hectares which has potential to deliver 1,000-1,500 new homes alongside suitable supporting infrastructure and at Bishop's Court Lane. (Planning consultants; Landowners/Developers).
- Lacks clarity on key specific details that could have a significant impact on the long term future of Devon County Showground (Devon County Agricultural Association).

Calls For

- Reduce reliance on Marlcombe by allocating additional early-delivery sites to strengthen housing supply resilience (Planning consultants; HBF).
- Strengthen evidence on water, wastewater, primary care, utilities and education to support the level of development proposed (Public body – Environment Agency; Public body – NHS Devon ICB).
- Provide clearer and more flexible masterplanning requirements, including roles, processes, engagement and scope for changes during future masterplanning stages (Planning consultants; Landowners/Developers).
- Transport evidence for the SRN and define realistic phasing for required interventions (Public body – National Highways).
- Review density expectations to ensure they reflect site conditions, viability and character (Planning consultants; Landowners/Developers).
- Refine SANG requirements, ensuring adequate corridor widths, noise mitigation and removal of sensitive habitats such as Cats Copse from SANG designation (Public body – Natural England).

- Clarify affordable housing expectations by identifying a viable baseline supported by evidenced viability work (Planning consultants; Landowners/Developers).

WS02: Development within the Enterprise Zone

Total responses: 1

Main Issues:

- Objection that the proposed substation location is too close to existing Farringdon properties. (Individual)

Calls For:

- Identify an alternative substation location further away from residential dwellings. (Individual)

WS03: Exeter Science Park

Total responses: 0

- No responses were received for this policy.

WS04: Land north of the Science Park

Total responses: 1

Main Issues:

- No objections raised; one respondent expresses clear support. (Individual)

WS05: Exeter Airport and its future operation and development

Total responses: 0

- No responses were received for this policy.

WS06: Land east of the airport

Total responses: 2

Main Issues:

- Environment Agency states SFRA findings should be required (“must/shall”), not optional (“should”). (Environment Agency)
- Landowner supports allocation but says some uses and wording are too restrictive, and the masterplan requirement may delay delivery. (Developers/Planning Consultants)
- Landowner seeks inclusion of additional adjacent land to expand employment provision. (Developers/Planning Consultants)

Calls For:

- Strengthen SFRA wording to “must/shall”. (Environment Agency)
- Add flexibility to employment use classes (including sui generis) and simplify ancillary-use wording. (Developers/Planning Consultants)
- Allow masterplanning to be proportionate and not block phased delivery; permit allocation boundary expansion. (Developers/Planning Consultants)

WS07: Employment land north of the airport, adjoining Treasbeare

Total responses: 2

Main Issues:

- Environment Agency wants SFRA wording strengthened (“must/shall”). (Environment Agency)
- Historic England welcomes new wording requiring heritage impact assessment and design mitigation. (Historic England)

Calls For:

- Replace “should” with stronger SFRA compliance wording. (Environment Agency)
- Retain strengthened heritage wording. (Historic England)

WS08: Employment land opposite airport buildings, south of A30

Total responses: 3

Main Issues:

- Environment Agency requests mandatory (“must/shall”) use of SFRA evidence. (Environment Agency)
- Adjacent landowner wants boundary expanded to include an additional 0.8ha parcel with no known constraints. (Developers/Planning Consultants)

Calls For:

- Strengthen SFRA wording. (Environment Agency)
- Extend WS08 boundary to include adjoining developable land. (Developers/Planning Consultants)

WS09: Clyst Valley Regional Park

Total responses: 18

Main Issues:

- Multiple landowners object to CVRP boundary being extended onto their land without clear justification or consultation. (Developers/Planning Consultants; Landowners)
- Calls for clarity that CVRP does not prevent development, referencing adopted Local Plan wording. (Developers/Planning Consultants)

- Objections to CVRP covering parts of the Devon County Showground, citing lack of evidence. (Devon County Agricultural Association)
- Natural England supports the policy but asks for clarity on SANG wording. (Natural England)
- Some promoters support CVRP in principle but seek boundary changes allowing complementary development. (Landowners/Promoters)

Calls For:

- Remove or amend CVRP boundaries where drawn without evidence or where they overlap operational land. (Landowners; Devon County Agricultural Association))
- Add clarity on SANG being required only when mitigating European-site impacts. (Natural England)
- Reinsert adopted Local Plan wording confirming CVRP is not a “policy boundary” preventing development. (Developers/Planning Consultants)
- Correct minor wording errors. (Devon Wildlife Trust)

WS10: Development next to the M5 and north of Topsham

Total responses: 18

Main Issues:

- Numerous objections citing flood risk, ecological sensitivity, proximity to Clyst Marshes CWS, and climate-change flood projections. (Residents; Community Groups; Planning Consultants)
- Traffic constraints: Clyst Road narrow, often flooded; junctions already congested. (Residents/Community Groups)
- Cross-boundary concerns: requires coordination with Exeter City Council; insufficient evidence of joint work. (Planning Consultants; Residents)
- Network Rail requests inclusion of rail capacity enhancements wording. (Network Rail)
- National Highways emphasises need for cumulative impact assessment and early mitigation identification. (National Highways)
- Some landowners support allocation but want greater flexibility for early phases. (Developers/Planning Consultants)

Calls For:

- Remove or reduce WS10; exclude land east of Clyst Road. (Residents/Community Groups)
- Require explicit links to Newcourt Road and rail-capacity upgrades. (Network Rail; Planning Consultants)
- Strengthen infrastructure evidence before adoption, including M5 J30 mitigation. (National Highways)
- Allow phased releases where they do not prejudice wider masterplanning. (Developers/Planning Consultants)

WS11: Gypsy and traveller site east of M5

Total responses: 0

- No responses were received for this policy.

WS12: Employment land at Sandygate

Total responses: 2

Main Issues:

- Historic England objects to the use of the term “Scheduled Ancient Monument” and requests correction. (Historic England)
- National Highways says cumulative transport impacts are not fully evidenced. (National Highways)

Calls For:

- Replace “Ancient” with “Scheduled Monument.” (Historic England)
- Include clearer contributions strategy for strategic road network mitigation. (National Highways)

WS13: Employment land at Lodge Trading Estate, Broadclyst

Total responses: 3

Main Issues:

- Devon Wildlife Trust seeks habitat buffering for grazing marsh priority habitat. (Devon Wildlife Trust)
- National Highways raises similar concerns about cumulative transport evidence as WS12/14/15. (National Highways)

Calls For:

- Add requirement for sufficient ecological buffers to protect grazing marsh habitat. (Devon Wildlife Trust)
- Provide clearer strategic transport-mitigation framework. (National Highways)

WS14: Employment land south of Langdon’s Business Park, Clyst St Mary

Total responses: 1

Main Issues:

- National Highways repeats concerns that policy lacks clear strategic mitigation for cumulative transport impacts. (National Highways)

Calls For:

- Add reference to strategic transport-mitigation contributions. (National Highways)

WS15 – Darts Farm

Total responses: 3

Main Issues:

- National Highways says cumulative transport effects from intensification are not fully evidenced. (National Highways)
- One respondent says policy lacks a spatially defined landscape framework to protect the Clyst Valley from incremental intensification. (Resident/Community Stakeholder)

Calls For:

- Introduce explicit landscape/green-infrastructure framework for the West End. (Resident/Community Stakeholder)
 - Include strategic transport-mitigation requirements. (National Highways)
-

5. Development in the Towns and Villages

Total responses: 2033

SD01 - Exmouth and its development allocations

Total responses: 1774

Exmo_23 – Land to the South of Courtlands Lane

Total responses: 2

Main Issues:

- Development needs to ensure it is planned in coordination with the adjacent Lymp_07 allocation (Public Body – Devon County Council).
- Highlights the need for a coherent access strategy covering both Exmo_23 and Lymp_07, including safe pedestrian, cycle and vehicle movement through the area (Public Body – Devon County Council).
- Landscape and heritage sensitivity is noted, with built development needing careful design due to nearby heritage assets (Public Body – Devon County Council).
- The importance of retaining the East Devon Way footpath through the wider area is emphasised (Public Body – Devon County Council).

Calls For:

- Combine Exmo_23 and Lymp_07 into a single coordinated policy section to ensure unified planning, access and layout (Public Body – Devon County Council).
 - Provide a coordinated access strategy that addresses sustainable transport, including active travel links, off-street pedestrian/cycle routes and connections to adjacent areas such as Lympstone Manor (Public Body – Devon County Council).
-

- Ensure design is sensitive to heritage and landscape constraints, particularly where development affects nearby heritage assets (Public Body – Devon County Council).
- Retain and enhance the East Devon Way footpath within a generous green corridor (Public Body – Devon County Council).

Lymp_07 – Land at Courtlands Cross

Total responses: 3

Main Issues:

- Respondents emphasise the need for coordinated planning with Exmo_23 to ensure a unified approach to access, layout and infrastructure (Public Body – Devon County Council).
- Argue that Lymp_07 remains a suitable and deliverable site that can offer benefits including housing, employment land, sports pitches and improved pedestrian routes (Planning Consultants).
- Concerns are raised by some individuals about cumulative impacts when combined with neighbouring allocations, particularly around traffic, active-travel provision and local infrastructure capacity (Individuals).
- The East Devon Way footpath is highlighted as a key feature requiring protection and sensitive integration within the design (Public Body – Devon County Council).

Calls For:

- Combine Lymp_07 with Exmo_23 in a single coordinated policy section, supported by a unified access strategy (Public Body – Devon County Council).
- Deliver enhanced pedestrian and cycle connections through the site, including safe east–west and north–south routes and links to Lympstone Manor and adjoining areas (Public Body – Devon County Council).
- Retain and enhance the East Devon Way in a generous green corridor (Public Body – Devon County Council).
- Progress the allocation as proposed, recognising its potential to deliver housing, employment land and sports facilities where constraints are addressed (Planning Consultants).

Exmo_47 – Land west of Hulham Road

Total responses: 0

- No responses were received for this site.

Lymp_14 - Coles Field

Total responses: 4

Main Issues:

- Some respondents object to development because Lymp_14 provides the main access route to Exmo_04, raising concerns about traffic, safety and impacts on narrow rural roads (Individuals).
- Ecological sensitivities are highlighted, with comments noting biodiversity interest on and near the site and the risk of habitat fragmentation if both Lymp_14 and Exmo_04 proceed (Individuals).
- Respondents argue that development would increase vehicle movements along Hulham Road, which already has limited pedestrian provision and would require improvements to support safe walking and cycling (Individuals, Public Body – Devon County Council).
- Devon County Council identifies the need for strong active-travel connections linking Lymp_14 to Exmo_04a and Goodmores Farm (Public Body – Devon County Council).
- No site-promoter objections were submitted specifically regarding Lymp_14.

Calls For:

- Remove Lymp_14 from the Local Plan due to ecological sensitivity, access concerns and its role as the only route to Exmo_04 (Individuals).
- Ensure any allocation requires safe pedestrian and cycle connections to Exmo_04a, Goodmores Farm and the wider network (Public Body – Devon County Council).
- Require development to protect biodiversity features and avoid harm to adjoining priority habitats (Public Body – Devon County Council).
- Provide localised improvements to support sustainable travel modes if the site is retained (Public Body – Devon County Council).

Exmo_04a – Marley Drive

Total responses: 22

Main Issues:

- Many respondents object because the site contains important habitats including Wood-Pasture Priority Habitat, ancient/veteran trees and red-list species, which they believe make it unsuitable for development (Individuals, Community Groups).
- The land is viewed as an important wildlife corridor between ancient woodland blocks, and development is seen as causing irreversible ecological fragmentation (Individuals).
- Concerns are raised about an underground watercourse and the site's role in managing run-off from Woodbury Common, with fears that development would increase flooding in Exmouth (Individuals).
- Access from Higher Marley Road is considered unsafe due to narrow roads, additional traffic and proximity to the Pebblebed Heaths (Individuals, Community Groups).
- Some respondents highlight the site's historic parkland character and mature Luccombe oaks as important landscape features that should be retained (Individuals).

- Developers argue the site can accommodate a higher number of homes than proposed and that technical constraints can be addressed (Developers/Landowners).
- Devon County Council notes the need for pedestrian/cycle links to Lymp_14 and Goodmores Farm (Public Body – Devon County Council).

Calls For:

- Remove the site from the Local Plan due to habitat sensitivity, biodiversity value and flood risk (Individuals, Community Groups).
- Protect ancient/veteran trees, priority habitats and the parkland landscape by preventing development (Individuals).
- Avoid altering or diverting the underground stream to prevent downstream flooding (Individuals).
- If allocated, require strong pedestrian/cycle connectivity with Lymp_14 and Goodmores Farm (Public Body – Devon County Council).
- Increase the housing capacity to around 130 dwellings to reflect evidence from the planning application, if the site is retained (Developers/Landowners).

Exmo_20 – Land at St John’s

Total responses: 1672

Main Issues:

- The site is considered unsuitable due to its immediate proximity to the Pebblebed Heaths SAC/SPA/SSSI, with significant concerns that development would lead to ecological harm through recreation pressure, cat predation, nitrogen deposition, habitat loss and disturbance to protected species including nightjar (Individuals, Community Groups, Devon Wildlife Trust, RSPB, Public Body – Natural England).
- Many respondents believe the allocation conflicts with the Habitats Regulations and lacks a viable mitigation strategy, with the HRA indicating uncertainty in ruling out adverse effects on integrity (Individuals, Community Groups, Devon Wildlife Trust, RSPB).
- The site lies within a Strategic Nature Area and contains priority habitats, ancient woodland, veteran trees and unconfirmed wildlife sites, which respondents consider highly sensitive and unsuitable for development (Individuals, Community Groups, Devon Wildlife Trust).
- Access via the B3179 is considered unviable due to required major highway works, increased congestion, air-quality impacts on the heathland and risks associated with narrow rural roads (Individuals, Planning Consultants, Community Groups).
- The distance from services and the isolated location are viewed as leading to car-dependent development contrary to sustainable transport policies and the intentions of TR01 (Individuals, Planning Consultants, Community Groups).

- Respondents raise concerns that increased surface water run-off from this elevated greenfield site will exacerbate flood risks associated with Withycombe Brook and local drainage infrastructure (Individuals, Community Groups).
- Many believe the scale of development would cause considerable heritage harm to the Grade II* Church of St John in the Wilderness and its tranquil rural setting (Individuals, Public Body – Historic England, Community Groups).
- A large number of representations argue the allocation is unsound due to conflicts with numerous NPPF policies relating to biodiversity, heritage, transport, landscape, plan-making and climate resilience (Individuals, Community Groups, Planning Consultants).
- Some respondents highlight uncertainties around the Mineral Safeguarding Area affecting site capacity, deliverability and the need for prior extraction (Public Body – Devon County Council, Planning Consultants).
- Concerns are raised about infrastructure capacity, including impacts on water supply, sewage systems, GP surgeries, schools and local roads, which communities feel are already overstretched (Individuals, Community Groups).
- Several respondents believe the selection process for the site was flawed, including claims the Site Selection Methodology was altered and that alternative, less sensitive sites exist (Individuals, Planning Consultants, Community Groups).
- Some objections emphasise the loss of agricultural land and the site's important buffer role between Exmouth and the protected heathlands (Individuals, Devon Wildlife Trust, Community Groups).
- Some developer interests maintain the site is deliverable but request increased flexibility around minerals, heritage buffers, and tree/hedgerow retention (Developers/Landowners, Planning Consultants).

Calls For:

- Remove Exmo_20 from the Local Plan entirely due to environmental, heritage, access, sustainability and legal compliance concerns (Individuals, Community Groups, Devon Wildlife Trust, RSPB).
- Exclude at least the 400m zone adjacent to the Pebblebed Heaths to protect European site integrity and reduce cat predation risk (Individuals, RSPB, Devon Wildlife Trust, Public Body – Natural England).
- Reduce the overall scale of development or restrict built development to the southern part of the site away from the church and designated habitats (Individuals, Community Groups, Public Body – Historic England).
- Provide an alternative access solution avoiding the B3179, or reconsider access via Exmo_18 or other southern routes (Individuals, Public Body – Historic England, Community Groups).

- Undertake further detailed heritage, archaeological and ecological assessments before considering the site deliverable (Public Body – Devon County Council, Historic England).
- Reassess the mineral safeguarding implications and adjust policy wording to require clearer tests for prior extraction and flexibility where extraction is not viable (Public Body – Devon County Council, Planning Consultants).
- Move the settlement boundary further from the protected heathland and provide a natural buffer with native planting (Individuals, Public Body – Natural England).
- Consider alternative smaller sites in Exmouth or elsewhere that are closer to services and do not risk significant environmental harm (Planning Consultants, Individuals, Community Groups).

Exmo_18 - Land directly to the East of Liverton Business Park

Total responses: 3

Main Issues:

- Developers consider the requirement to keep development in the southern third below an undefined “ridgeline” unclear, unjustified and inconsistent with committee discussions (Developers/Landowners, Planning Consultants).
- They argue that fixed height or design restrictions could undermine the viability of employment uses (Developers/Landowners).
- Respondents note that landscape impacts should be considered alongside neighbouring allocations, including Exmo_17 opposite (Developers/Landowners).
- Some feel the policy pre-emptively sets design constraints that should be addressed through detailed masterplanning (Developers/Landowners).
- Devon County Council highlights the need for active-travel and bus improvements if a secondary access from Salterton Road is pursued (Public Body – Devon County Council).

Calls For:

- Remove or revise the “ridgeline” restriction and allow height and layout to be determined at planning application stage (Developers/Landowners, Planning Consultants).
- Retain but clarify the option for secondary access from Salterton Road (Developers/Landowners).
- Include requirements for extended shared-use paths, improved bus stops and coordination with Exmo_17 if secondary access is used (Public Body – Devon County Council).
- Maintain flexibility in design and layout to support deliverability (Developers/Landowners).

- Reinforce southern/eastern hedgerows and provide additional planting to soften landscape impacts (Developers/Landowners, Public Body – Devon County Council).

Exmo_17 – Land to the South of Littleham

Total responses: 72

Main Issues:

- Development is considered inappropriate due to the site's location within the East Devon National Landscape, where respondents emphasise harm to landscape character, tranquillity and long-distance views (Individuals, Community Groups).
- Heritage concerns focus on potential adverse effects on the Grade II* Littleham Church and the setting of multiple heritage features recorded across the site (Individuals).
- Respondents highlight the site's role as a wildlife corridor and the presence of species-rich habitats, mature trees and priority ecological features that they believe would be permanently lost (Individuals, Community Groups).
- Safety concerns are raised about a proposed access crossing of the Exmouth–Budleigh cycle/walking route, which is valued as a safe green corridor (Individuals).
- Flood risk concerns relate to surface run-off towards Littleham Brook and existing drainage pressures in the area (Individuals).
- The site is considered remote from services, with limited bus provision and no safe walking/cycling access to schools or shops, leading to car dependency (Individuals, Community Groups).
- Some respondents argue that reasons used to reject other National Landscape sites should also apply here, indicating inconsistency in site selection (Individuals).
- Developer representations support allocation but request emphasis on landscape-led design and improvements to cycle/pedestrian links (Developers/Landowners).
- Devon County Council notes archaeological potential and recommends clarity on required pedestrian/cycle connections (Public Body – Devon County Council).

Calls For:

- Remove Exmo_17 from the Local Plan due to landscape status, heritage sensitivity and policy conflicts (Individuals, Community Groups).
- Avoid vehicular access across the Exmouth–Budleigh cycle route to maintain safety and amenity (Individuals, Community Groups).
- Undertake more detailed heritage and archaeological assessments before determining the site's suitability (Public Body – Devon County Council, Individuals).
- Protect wildlife corridors, habitats, trees and hedgerows, with some suggesting the land is more suitable for nature recovery than development (Individuals, Community Groups).
- Reassess alternative sites outside the National Landscape and closer to services, or prioritise brownfield land (Individuals, Community Groups).

- Clarify and strengthen requirements for pedestrian and cycle links, including connections to Castle Lane and Littleham (Public Body – Devon County Council).

Exmo_08 and Exmo_16 combined - Littleham Fields

Total responses: 1

Main Issues:

- Concern that further housing in Littleham will worsen existing sewage problems and increase pollution risks (Individual).
- Fears that additional development will place unsustainable pressure on doctors, dentists and local schools, which are already overstretched (Individual).
- Objection to development within an Area of Outstanding Natural Beauty / National Landscape, where the respondent believes housing should not be permitted (Individual).
- Worries about cumulative effects alongside recent and ongoing development at Goodmores Farm and Dinan Way (Individual).
- Concern that local residents' concerns are ignored and that Exmouth does not require more new housing (Individual).

Calls For:

- Remove Exmo_08 and Exmo_16 from the Local Plan due to landscape sensitivity, infrastructure capacity issues and cumulative impacts (Individual).
- Avoid allocating further housing in Littleham until sewage, healthcare and education infrastructure are demonstrably improved (Individual).
- Give greater weight to local objections and avoid large-scale development in this part of Exmouth (Individual).

Exmo_50 - Exmouth town centre Police Station

Total responses: 1

Main Issues:

- Historic England notes that the updated policy wording now adequately addresses the concerns they raised at the first Regulation 19 stage regarding heritage impacts and clarity of expectations (Public Body – Historic England).

Calls For:

- No changes requested; Historic England supports the revised wording and considers the amendments appropriate and sound (Public Body – Historic England).

SD02: Axminster and its development allocations

Total responses: 21

Axmi_22 - Land east of Lyme Road

Total responses: 1

Main Issues:

- Devon County Council seeks amendments to ensure the possible future relief road is protected from development and safeguarded appropriately (Public Body – Devon County Council).
- No significant objections to the principle of development; comments relate primarily to access, safeguarding and infrastructure alignment (Public Body – Devon County Council).

Calls For:

- Amend SD02 text to require layout safeguarding for a potential future relief road connection and associated access requirements (Public Body – Devon County Council).
- Include pedestrian/cycle access via Loup Court with PROW enhancements (Public Body – Devon County Council).

GH/ED/80a - Prestaller Farm, Beavor Lane

Total responses: 0

- No responses were received for this site.

GH/ED/83 - Land west of Chard Road

Total responses: 1

Main Issues:

- One respondent objects due to flood risk, proximity to watercourses and potential effects on River Axe SSSI wildlife (Individual).
- Concern that development would worsen flood problems experienced elsewhere in Axminster following recent growth (Individual).

Calls For:

- Remove GH/ED/83 from allocation due to flood risk, ecological constraints and need for local amenity land (Individual).

Axmi_01a - Land west of Musbury Road

Total responses: 3

(Only comments relate to its removal from the plan)

Main Issues:

- Historic England supports the removal of Axmi_01a because of known archaeological sensitivity (Public Body – Historic England).
- National Highways notes that removal of Axmi_01a reduces previous concerns about development pressure near the A35 (Public Body – National Highways).
- Devon County Council also notes and supports the removal of the allocation (Public Body – Devon County Council).

Calls For:

- No calls for reinstatement; respondents support its deletion due to heritage and road-network considerations (Public Body – Historic England; Public Body – National Highways; Public Body – Devon County Council).

Axmi_02 - Land east of Musbury Road (Part of Axmi_02, Axmi_08 and Axmi_09 allocation)

Total responses: 8

Main Issues:

- Significant archaeological sensitivity is highlighted, including Roman and Romano-British remains and potential impacts on the adjacent Scheduled Monument (Public Body – Historic England; Public Body – Devon County Council; Individuals).
- Historic England notes that although requirements for archaeological evaluation and masterplanning are welcomed, it is not yet demonstrated that the site can be developed without unacceptable harm (Public Body – Historic England).
- Devon County Council removes its objection subject to archaeological evaluation and a layout that minimises impacts on the Scheduled Monument (Public Body – Devon County Council).
- Several individuals emphasise archaeological significance, flood risk, access issues, bat activity and infrastructure constraints, arguing the allocation is unsuitable (Individuals).
- Developers generally support housing allocation but consider some policy requirements too prescriptive, including public transport measures, heritage open space location, and open space requirements (Developers/Landowners).
- Concerns about employment part of allocation when there is an overprovision in the plan and the lack of justification for a community hall and related viability issues (Developers/Landowners).
- Concerns from individuals that the policy does not clearly define the “northern part” of the site intended for heritage-related open space (Individuals).

Calls For:

- Some respondents seek removal of Axmi_02 due to unresolved archaeological, heritage and environmental constraints (Public Body – Historic England; Individuals).

- Others support allocation but request more flexible wording on transport measures, open space, heritage treatment and employment uses (Developers/Landowners – CG Fry & Son).
- Devon County Council requests clearer definition of areas requiring heritage protection and completion of fieldwork before confirming suitability (Public Body – Devon County Council).
- Individuals seek robust archaeological analysis and clearer mapping of any non-developable heritage areas (Individuals).

Axmi_08 – Land north of Axminster town (Part of Axmi_02, Axmi_08 and Axmi_09 allocation)

Total responses: 8

Main Issues:

- Archaeological concerns mirror those for Axmi_02, though DCC notes its objection is now removed subject to archaeological evaluation and sensitive design (Public Body – Devon County Council).
- Historic England highlights risk of harm to archaeological assets and notes uncertainty about whether the policy can be implemented effectively (Public Body – Historic England).
- National Highways welcomes reference to strategic road network considerations in relation to Axmi_08 (Public Body – National Highways).
- Residents raise concerns regarding archaeology, flooding, access, SWW infrastructure and ecological impacts, especially bat activity (Individuals).

Calls For:

- Some individuals and Historic England call for removal unless archaeological investigations clearly demonstrate an acceptable development solution (Public Body – Historic England; Individuals).
- Devon County Council supports allocation with conditions relating to archaeology and layout (Public Body – Devon County Council).
- Developers (CG Fry & Son) request reduced prescriptiveness in heritage and transport requirements (Developers/Landowners).
- National Highways supports inclusion of strategic road network safeguards (Public Body – National Highways).

Axmi_09 - Land east of Musbury Road (Southern parcel) (Part of Axmi_02, Axmi_08 and Axmi_09 allocation)

Total responses: 9

Main Issues:

- Devon County Council maintains its objection because archaeological work is incomplete and the site should not be allocated until results are available (Public Body – Devon County Council).
- Historic England similarly raises concerns about landscape and heritage impacts, with uncertainty over whether development is achievable without harm (Public Body – Historic England).
- National Highways comments positively on references within the policy to SRN requirements (Public Body – National Highways).
- Individuals raise concerns similar to Axmi_02/08 regarding archaeology, infrastructure, and environmental constraints (Individuals).

Calls For:

- Remove Axmi_09 unless archaeological investigations demonstrate that harm can be avoided or mitigated (Public Body – Devon County Council; Public Body – Historic England; Individuals).
- Ensure SRN considerations remain embedded in policy wording (Public Body – National Highways).
- Provide robust, proportionate evidence before confirming allocation (Public Body – Historic England).

Axmi_11c - Land east of Lyme Close

Total responses: 0

- No responses were received for this site.

Axmi_23 - Websters Garage, 9 Lyme Street

Total responses: 2

Main Issues:

- Objection to Axmi_23's allocation on the basis that the site is no longer deliverable for housing following relocation of the Co-op store (Planning Consultants).
- They argue the mixed-use requirement is unjustified and inconsistent with the treatment of the Co-op's own site (Planning Consultants).
- Historic England supports the updated wording regarding conservation area protection (Public Body – Historic England).

Calls For:

- Remove Axmi_23 from the plan or re-evaluate its deliverability due to occupation by the relocated Co-op store (Planning Consultants).
- Provide clarity on whether mixed use (including retail) is realistic and enforceable (Planning Consultants).
- Retain and apply strengthened heritage wording (Public Body – Historic England).

Axmi_24 – Land west of Prestaller Farm

Total responses: 0

- No responses were received for this site.

SD03: Honiton and its development allocations

Total responses: 24

Gitti_03, Gitti_04 and Gitti_05 - Land west of Hayne Lane

Total responses: 4

Main Issues:

- The site promoter supports the allocation, including 310 homes and 14.6 ha employment/community uses, and confirms deliverability (Landowner/Developers).
- Gittisham Parish Council strongly objects due to lack of infrastructure evidence, unsustainable location, WSWW capacity issues and concerns highlighted in the Water Cycle Study (Parish Council).
- The National Landscape body raises concerns about major development within or affecting the NL (Public Body – Blackdown Hills NL).

Calls For:

- Delete Gitti_03, Gitti_04 and Gitti_05 due to infrastructure, sewage capacity and unsustainable growth concerns (Parish Council; Public Body – Blackdown Hills NL).
- Retain allocation but allow flexibility in commercial/employment uses and confirm access options via Hayne Lane (Developers/Landowners).

Honi_06 - Former Millwater School at Honiton Bottom Road

Total responses: 0

- No responses were received for this site.

Honi_07 - Land adjacent to St Michael's Church

Total responses: 5

Main Issues:

- Historic England raises significant concerns over impacts on the Grade II* church, lychgate and former Sexton's House, and questions whether 30 homes are achievable with required mitigation (Public Body – Historic England).
- They request a concept plan to justify capacity and ensure design responds to heritage and National Landscape setting (Public Body – Historic England).

- The National Landscape body considers the allocation harmful, noting it lies wholly within the designated landscape and risks eroding the separation between town and countryside (Public Body – Blackdown Hills NL).
- A site promoter supports the allocation and confirms deliverability of 30 homes with mitigation, buffers and safe access (Developers/Landowners).

Calls For:

- Remove Honi_07 due to landscape and heritage impacts (Public Body – Blackdown Hills NL; Public Body – Historic England).
- Provide a concept plan and reduce capacity if necessary to avoid harm (Public Body – Historic England).
- Retain allocation for 30 homes with the existing policy approach (Developers/Landowners).

Honi_12 – Land south east of Cuckoo Down Lane

Total responses: 1

Main Issues:

- Honiton Town Council supports the removal of Honi_12 due to its amenity value and location within a National Landscape (Town Council).

Calls For:

- Retain removal of Honi_12 (Town Council).

Honi_10 – Land at Ottery Moor Lane

Total responses: 1

Main Issues:

- A site promoter supports the allocation and notes the site already has outline consent for 21 homes, granted August 2025 (Developers/Planning Consultants).
- They argue the policy wording should be updated to reference the extant consent.

Calls For:

- Amend SD03 to state that Honi_10 benefits from outline consent for 21 dwellings (Developers/Planning Consultants).

Honi_13 – Land at Middle Hill, Church Hill

Total responses: 4

Main Issues:

- Historic England has “significant concerns” due to proximity to the Grade II* Church of St Michael and All Angels and considers setting impacts potentially very high (Public Body – Historic England).

- They recommend deletion as the site sits adjacent to highly sensitive heritage assets within the National Landscape (Public Body – Historic England).
- The National Landscape body also opposes the allocation for its landscape impact (Public Body – Blackdown Hills NL).

Calls For:

- Remove Honi_13 from the Local Plan (Public Body – Historic England; Public Body – Blackdown Hills NL).
- Ensure any retained policy keeps land north of the road open or strengthens hedgerow/tree planting (Public Body – Historic England).

Honi_14 – Land at Northcote Hill

Total responses: 1

Main Issues:

- One individual notes Honi_14 among a wider group of Honiton sites as contributing to traffic, air quality and infrastructure pressure (Individuals).

Calls For:

- No specific modification requested for Honi_14 beyond general objections to growth in Honiton (Individuals).

Honi_18 – Land at Kings Road

Total responses: 7

Main Issues:

- Historic England welcomes additional text but seeks stronger safeguards for the setting of the Grade II Copper Castle toll house and recommends retaining and enhancing boundary hedgerows (Public Body – Historic England).
- Honiton Town Council objects to the allocation on procedural grounds, stating it was introduced late without proper consultation and raises concerns about access safety (Town Council).
- Multiple individuals object due to unsafe proposed access onto the A35, poor visibility, steep gradients and past highway objections (Individuals).
- A developer supports allocation but argues the National Landscape wording is overly prescriptive and inconsistent with NPPF guidance (Developers/Planning Consultants).
- Network Rail seeks clearer requirements for a high-quality walking/cycling route linking Honi_18 with GH/ED/39a&b and the station (Public Body – Network Rail).

Calls For:

- Remove Honi_18 due to lack of consultation and highway safety concerns (Town Council; Individuals).

- Amend NL wording to be less prescriptive and more aligned with national policy (Developers/Planning Consultants).
- Add text requiring hedgerow retention and enhancement (Public Body – Historic England).
- Provide a new safe access or reconsider the allocation entirely (Individuals).
- Require clearer active-travel links to GH/ED/39a & b and the station (Public Body – Network Rail).

GH/ED/39a – Land south of Northcote Hill (north of the railway)

Total responses: 4

Main Issues:

- Site promoter supports the increased capacity from 100 to 115 homes and notes outline permission was resolved to be granted in 2023 (Developers/Landowners).
- National Grid raises concerns about overhead 400kV transmission lines crossing the site and requires policy recognition (Public Body – NGET).
- Woodland Trust highlights proximity to Ancient Woodland and requests buffers of at least 50 metres (NGO – Woodland Trust).

Calls For:

- Add policy text requiring compliance with NGET design guidance (Public Body – NGET).
- Add wording to protect Ancient Woodland and ensure appropriate buffer distances (NGO – Woodland Trust).

GH/ED/39b – Land south of Northcote Hill (south of the railway)

Total responses: 6

Main Issues:

- Site promoter argues capacity should increase from 195 to at least 299 homes, supported by technical assessments and a submitted outline application (Developers/Planning Consultants).
- NGET identifies the 400kV overhead route crossing the site and requires policy wording acknowledging constraints (Public Body – NGET).
- The National Landscape body raises concerns about impacts on the Blackdown Hills NL (Public Body – Blackdown Hills NL).
- Network Rail seeks clearer active-travel connectivity between GH/ED/39a/b, Honi_18 and the station (Public Body – Network Rail).

Calls For:

- Increase capacity to at least 299 homes (Developers/Planning Consultants).
- Add NGET compliance wording (Public Body – NGET).

- Strengthen NL mitigation or reconsider allocation (Public Body – Blackdown Hills NL).
- Require a dedicated safe walking/cycling link to the station (Public Body – Network Rail).

Employment Land within the Existing Heathpark Industrial Estate

Total responses: 0

- No responses were received for this site.

SD04: Ottery St Mary and its development allocations

Total responses: 22

Otry_01b – Barrack Farm

Total responses: 2

Main Issues:

- The landowner supports allocation but argues that capacity should be increased to around 190 homes and 1.25ha of employment land. (Developers/Planning Consultants)
- Claims the site can accommodate more housing efficiently in line with NPPF policy on optimal site use. (Developers/Planning Consultants)
- Suggests coordinated access and design with Otry_09 to ensure both sites work together. (Developers/Planning Consultants)
- One respondent argues the allocation boundary should extend west to reflect likely roundabout positioning. (Landowner)

Calls For:

- Increase the allocation to at least 90 homes within the existing boundary or around 190 homes with an expanded boundary. (Developers/Planning Consultants)
- Amend policy wording to reference coordinated access with Otry_09. (Developers/Planning Consultants)
- Expand the boundary westwards to mirror Otry_09. (Landowner)
- Reference opportunities for sustainable travel improvements. (Developers/Planning Consultants)

Otry_09 – Land at Thorne Farm

Total responses: 2

Main Issues:

- Promoter seeks changes to ensure Otry_09 and Otry_01b can share an access solution without fettering either site. (Developers/Planning Consultants)

- Town Council states that a Flood Risk Assessment should be required for the site. (Town Council)

Calls For:

- Add policy wording requiring access arrangements to consider future connection to Otry_01b. (Developers/Planning Consultants)
 - Require an FRA for the allocation. (Town Council)
-

Otry_10 – Land at Salston Barton

Total responses: 0

- No responses were received for this site.
-

Otry_15 – Land at Bylands, Slade Road

Total responses: 0

- No responses were received for this site.
-

GH/ED/27 – Land south of Strawberry Lane

Total responses: 3

Main Issues:

- The promoter supports the allocation and states that the site is fully deliverable, with a live application demonstrating mitigation of technical issues. (Developers/Planning Consultants)
- Representations highlight completed or ongoing work on FRA, archaeology, access, and pedestrian/cycle connectivity. (Developers/Planning Consultants)
- The site is viewed as important to early delivery due to five-year supply pressures. (Developers/Planning Consultants)

Calls For:

- Retain GH/ED/27 as an allocation for around 60 homes. (Developers/Planning Consultants)
 - Recognise the planning application as evidence of deliverability. (Developers/Planning Consultants)
 - Support policy wording enabling sustainable transport improvements. (Developers/Planning Consultants)
-

Otry_21 – Gerway Farm

Total responses: 44

Main Issues:

- Extensive objections highlight severe transport constraints including narrow roads, congestion, weak pavements and unsafe school routes at Winters Lane, Longdogs Lane and Tip Hill. (Residents)
- Concerns regarding landscape harm, loss of high-quality agricultural land and effects on views including Belbury Castle. (Residents)
- Repeated reference to wastewater capacity issues, storm overflow failures and risks to the River Otter, citing WCS and SWW documents. (Residents)
- Claims the allocation conflicts with the Ottery St Mary Neighbourhood Plan which identifies no need for further strategic allocations. (Residents)
- Biodiversity concerns raised including bats, dormice, raptors, badgers, beavers and recreational impacts on Pebblebed Heaths SAC/SPA. (Residents)
- Archaeological sensitivity noted due to prehistoric and Romano-British features and historic field pattern. (Residents)
- Objections question the increase from around 40 dwellings to 70 despite no infrastructure improvements. (Residents)
- Some promoters support the allocation but seek flexibility or expansion to around 140–150 homes based on a live application. (Developers/Planning Consultants)
- Town Council identifies that any extension of the site would require an FRA. (Town Council)

Calls For:

- Remove Otry_21 from the Local Plan. (Residents)
- Reassess the site due to transport safety, landscape harm, ecological sensitivity and water infrastructure constraints. (Residents)
- Treat drainage and water quality evidence as preventing allocation. (Residents)
- Require safe pedestrian routes and infrastructure upgrades if allocation is retained. (Residents)
- Allow flexibility or increase capacity to around 140–150 homes where supported by landowners. (Developers/Planning Consultants)
- Require an FRA for any enlarged site. (Town Council)

SD05: Seaton and its development allocations

Total responses: 8

Seat_02 - Land at Barnards Hill Lane

Total responses: 1

Main Issues:

- Concern that the removal of wording requiring safe access onto Poplar Tree Drive is unjustified and risks compromising highway safety. (Resident)

- Lack of evidence from highways to support deletion of text relating to access and junction mitigation. (Resident)

Calls For:

- Restore the requirement for safe access onto Poplar Tree Drive and the need to address the Poplar Tree Drive/Barnards Hill Lane junction. (Resident)
- Retain stronger engineered access requirements rather than weaker “traffic calming” language. (Resident)

Seat_03 – Land to the south of Harepath Hill

Total responses: 1

Main Issues:

- Concern that replacing the specific 55m contour line with “around the 55m contour line” introduces ambiguity and risks harmful development too close to existing dwellings. (Resident)
- Concerns that approximation could lead to future reinterpretation during planning appeals, harming privacy and residential amenity. (Resident)

Calls For:

- Reinstate the fixed 55m contour line rather than “around the.” (Resident)
- Provide clearer policy wording to avoid reinterpretation that could lead to adverse amenity impacts. (Resident)

Seat_05 – Land off Harepath Road

Total responses: 1

Main Issues:

- Support for the employment land element north of the existing industrial estate. (Resident)
- Support for requirement for harmonised vehicular access off Harepath Road as safest access point. (Resident)

Calls For:

- Retain requirement for access from Harepath Road as the primary vehicular access. (Resident)
- Ensure bus stop enhancements and pedestrian/cycle connections are secured. (Resident)

Seat_13a – Land west of Axeview Road

Total responses: 4

Main Issues:

- Concerns regarding surface water flooding from development at Seat_13a. (Resident)
- Objections that the site lies immediately north of a Scheduled Monument and development would harm its setting and archaeological significance. (Historic England)
- DCC raises insufficient information on archaeological interest associated with the Scheduled Monument and maintains objection. (Devon County Council)
- Support the inclusion of the final sentence relating to Beer Quarry and Caves SAC. (Resident).

Calls For:

- Reconsider allocation due to potential surface water flooding impacts. (Resident)
- Remove the allocation due to harm to the Scheduled Monument and its setting. (Historic England)
- Provide further archaeological evidence or delete allocation in absence of this. (Devon County Council)

SD06: Sidmouth and its development allocations

Total responses: 54

Sidm_01 – Land south-west of Woolbrook Road

Total responses: 6

Main Issues:

- Objection to increase from 127 to 160 homes without prior consultation or clear justification. (Residents)
- Concern that the site lies within the National Landscape and conflicts with policy requiring the highest level of protection. (Residents)
- Objection that the site extends beyond the settlement boundary without neighbourhood plan support. (Residents)
- Concerns over absence of affordable housing provision in the draft allocation. (Residents)
- Developers state the site is suitable, available and supported by technical work and welcome the move to “around 160 homes.” (Developers/Planning Consultants)

Calls For:

- Reverse the increase to 160 homes or reconsider the allocation entirely. (Residents)
- Remove the site due to conflict with National Landscape and settlement boundary policies. (Residents)
- Clarify or justify landscape wording to avoid unrealistic requirements. (Developers/Planning Consultants)
- Retain allocation for around 160 homes with wording amended to ensure realistic expectations linked to landscape design. (Developers/Planning Consultants)

Sidm_06a – Land west of Two Bridges Road, Sidford

Total responses: 31

Main Issues:

- Several residents raise major concerns that the site lies entirely within the National Landscape and constitutes major development contrary to national policy tests. (Residents)
- Concerns over removal of the previous 30-home capacity reduction to 15 homes without robust landscape evidence. (Developers/Planning Consultants and Residents)
- Objections on grounds of Green Wedge conflict and settlement coalescence between Sidford and Sidbury. (Residents)
- Concern that the local infrastructure (roads, drainage, medical facilities, schools) is already overstretched. (Residents)
- Developers argue the site is suitable, well related to the settlement and capable of accommodating at least 30 homes, with potential for expansion into Sidm_06b. (Developers/Planning Consultants)
- Objections that the consultation process lacked transparency. (Residents)

Calls For:

- Remove Sidm_06a from the Local Plan due to National Landscape, Green Wedge and infrastructure constraints. (Residents)
- Restore or increase site capacity to around 30 homes or expand to include parts of Sidm_06b to improve design and deliver infrastructure. (Developers/Planning Consultants)
- Require clear justification for landscape constraints and present evidence transparently. (Residents)
- Demonstrate exceptional circumstances if development is retained within the National Landscape. (Residents)

Sidm_31 – Land east of Burscombe Lane / west of Windsor Mead

Total responses: 17

Main Issues:

- Objection that the site lies entirely within the National Landscape and fails the tests for major development in designated landscapes. (Residents)
- Strong concerns over access feasibility: Windsor Mead is a cul-de-sac with no realistic through-road, and Burscombe Lane is narrow, lacks footways, and has a dangerous junction with the A3052. (Residents)
- Claims that access may require a Compulsory Purchase Order and that this uncertainty undermines allocation deliverability. (Residents)

- Concerns regarding flooding, surface water runoff and inadequate drainage capacity. (Residents)
- Objection that the site was previously rejected and has been reintroduced without clear consultation. (Residents)
- Concerns about heritage impact, including proximity to Romano-British settlement evidence. (Residents)
- Objection that the site conflicts with settlement boundary policy and the Sid Valley Neighbourhood Plan. (Residents)

Calls For:

- Delete Sidm_31 from the Local Plan due to access, landscape, drainage and policy conflict. (Residents)
- Require robust access solutions, drainage assessments and heritage investigation if retained. (Residents)
- Correct evidence regarding road safety at the A3052 junction. (Residents)
- Demonstrate exceptional circumstances for development within the National Landscape. (Residents)

SD07: Development allocations at Broadclyst

Total responses: 8

Brcl_12 – Land west of Whimple Road, Broadclyst

Total responses: 8

Main Issues:

- Developers support allocation but argue capacity should increase from 100 to 145 homes to make effective use of land. (Developers/Planning Consultants)
- Developer emphasises the sustainability, deliverability and technical soundness of the site, drawing on an active outline application (25/1133/MOUT). (Developers/Planning Consultants)
- Concerns raised by residents about flooding, with repeated references to saturated ground, overflows and Winter Gardens flooding regularly. (Residents)
- Significant concerns about traffic, congestion, narrow lanes, lack of pavements and school-related vehicle pressure around Town End. (Residents)
- Concerns about noise, privacy, security and increased footfall where an existing lightly-used footpath is proposed to become a main access route. (Residents)
- Residents highlight perceived lack of sewage capacity and regular overflows, contrary to developer representations. (Residents)
- Concerns that the playing field proposed on site lacks dedicated parking and will intensify parking pressure along Town End. (Residents)

Calls For:

- Increase site capacity to around 145 dwellings to optimise land use and respond to district housing need. (Developers/Planning Consultants)
- Ensure pedestrian/cycle connectivity is redesigned to avoid overloading a narrow residential footpath. (Residents)
- Require robust drainage solutions and evidence addressing Winter Gardens flooding. (Residents)
- Require comprehensive road safety improvements, pavements and cycle routes associated with school travel. (Residents)
- Provide detailed assessment of sewage system capacity and mitigation. (Residents)

Brcl_29 – Land to east of Town End, Broadclyst

Total responses: 7

Main Issues:

- Brcl_29 is expected to come forward with Brcl_12 under a joint masterplan requiring access through Brcl_12, which developer supports. (Developers/Planning Consultants)
- Residents express strong concerns about the proposed footpath link emerging near Town End, citing lack of pavements and high traffic volumes. (Residents)
- Concerns that cumulative development at Brcl_12 + Brcl_29 will increase flooding along Town End and adjoining lanes. (Residents)
- Heritage concerns raised about effects on the Conservation Area and proximity to listed buildings. (Residents)
- Concerns about village infrastructure capacity, including GPs, schools, parking, road safety and drainage. (Residents)

Calls For:

- Require coordinated masterplanning between Brcl_12 and Brcl_29, including integrated access. (Developers/Planning Consultants)
- Re-site or redesign pedestrian routes to avoid unsafe Town End exit points. (Residents)
- Secure flood mitigation measures for Winter Gardens, Town End and wider Broadclyst lanes. (Residents)
- Require heritage-sensitive design respecting listed buildings and Conservation Area setting. (Residents)

SD08: Development allocations at Budleigh Salterton

Total responses: 3

Budl_02 – Land at Barn Lane, Knowle, Budleigh Salterton

Total responses: 3

Main Issues:

- Developer supports allocation of 35 homes but says the policy wording is too restrictive, especially the requirement to “conserve and enhance the natural beauty of the site,” which they argue conflicts with enabling development. (Developers)
- Concern that NL wording is inconsistent with other allocations and overly prescriptive about planting, buffers and lighting. (Developers)
- Otter Valley Association objects as the site is inside the National Landscape boundary and cannot meet the exceptional-circumstances test. (Community Group)
- Sewage capacity concerns raised for the wider River Otter catchment. (Community Group)
- One resident supports Budl_02 as the most suitable site, provided infrastructure keeps pace. (Resident)

Calls For:

- Make policy wording more positive and landscape-led without preventing development. (Developers)
- Align NL requirements with other site policies and remove overly prescriptive details. (Developers)
- Reconsider allocation due to National Landscape impacts. (Community Group)
- Address sewage capacity issues before further growth. (Community Group)
- Ensure infrastructure supports 35 new dwellings if allocation proceeds. (Individual)

SD09 – Development allocations at Colyton

Total responses: 1

Coly_02 - Land at Hillhead

Total responses: 0

- No responses were received for this site.

Land adjacent to the Peace Memorial Playing Fields (Coly_06a)

Total responses: 1

Main Issues:

- DCC welcomes the strengthened wording requiring footway improvements along the site frontage. (Devon County Council)
- No objections or concerns recorded in the supplied document beyond technical clarification.

Calls For:

- Ensure footway improvements are delivered as part of the development. (Devon County Council)

SD10 – Development allocations at Lympstone

Total responses: 3

Lymp_01 – Little Paddocks, 22 Underhill Crescent

Total responses: 0

- No responses were received for this site.

GH/ED/72a – Land at Meeting Lane

Total responses: 1

Main Issues:

- Flood-risk wording change was not correctly explained, potentially preventing residents from recognising the significance of the modification. (Lympstone Water Quality Group)
- Serious concern that Lympstone is already at very high flood risk and cannot cope with any additional risk from new development. (Lympstone Water Quality Group)
- Claim that the site is unsuitable because development with any flood-risk component should be deleted from the Plan. (Lympstone Water Quality Group)
- Concern that the Plan has not demonstrated whether alternative sites elsewhere in East Devon could deliver the 42 homes without flood risk. (Lympstone Water Quality Group)
- Observation that Lympstone has high housing allocations but no supporting infrastructure upgrades planned. (Lympstone Parish Council)

Calls For:

- Delete GH/ED/72a from the Local Plan due to unacceptable flood-risk impacts. (Lympstone Water Quality Group)
- Require evidence there are no alternative sites that would not have a risk of flooding. (Lympstone Water Quality Group)
- Provide actual infrastructure upgrades (active travel, Green Infrastructure, etc.) if Lympstone continues to receive major allocations. (Lympstone Parish Council)

GH/ED/73 – Land north west of Strawberry Hill

Total responses: 0

- No responses were received for this site.

SD11 – Development allocations at Woodbury

Total responses: 4

Wood_06 – Land to rear of Orchard House, Globe Hill

Total responses: 0

- No responses were received for this site.

Wood_09 – Land off Globe Hill

Total responses: 1

Main Issues:

- Historic England welcomes strengthened design requirements to conserve and enhance settings of heritage assets. (Historic England)

Calls For:

- Retain enhanced heritage-led design wording. (Historic England)

Wood_10 – Land at Gilbrook

Total responses: 1

Main Issues:

- Historic England welcomes strengthened design requirements to conserve and enhance settings of heritage assets. (Historic England)

Calls For:

- Retain enhanced heritage-led design wording. (Historic England)

Wood_16 – Land south of Broadway

Total responses: 2

Main Issues:

- Developer supports the allocation but argues policy wording should reflect that outline consent (22/2838/MOUT) already establishes key design parameters. (Developers/Planning Consultants)
- Concern that new policy text could unduly constrain the reserved matters process, particularly regarding Conservation Area references and watercourse buffers. (Developers/Planning Consultants)
- Welcome additional text relating to Woodbury Conservation Area. (Historic England)

Calls For:

- Amend wording to explicitly recognise existing outline consent and avoid imposing additional or conflicting requirements. (Developers/Planning Consultants)
- Modify footpath wording to reflect the need for a PROW diversion rather than retention of the existing route. (Developers/Planning Consultants)

Wood_20 – Land east of Town Lane

Total responses: 0

- No responses were received for this site.

SD12: Development allocation at Broadhembury

Total responses: 6

Brhe_09 – Land opposite the Village Hall

Total responses: 5

Main Issues:

- The allocation is considered to constitute major development within the setting of the Blackdown Hills National Landscape, which is viewed as inappropriate and contrary to national and local landscape policy. (Parish Council; Blackdown Hills National Landscape body)
- Concerns are raised about harm to the character and appearance of the Broadhembury Conservation Area, including impacts on key views, village form, and nearby listed buildings. (Parish Council)
- The extension of the Built-Up Area Boundary to include the site is considered unjustified and inconsistent with the existing settlement pattern. (Parish Council)
- The allocation is said to conflict with local and national policies, including those relating to National Landscapes, strategic visual importance, conservation areas, and the council's heritage strategy. (Parish Council)

Calls For

- Remove the allocation of Brhe_09 from the Local Plan due to unacceptable landscape and heritage impacts. (Parish Council)
- Consider alternative sites within Broadhembury which would result in less harm to heritage assets and the National Landscape. (Parish Council)

SD13: Development allocation at Chardstock

Total responses: 1

Char_04a – Land off Green Lane

Total responses: 1

Main Issues:

- Developer expresses concerns that legal compliance issues have arisen from use of wrong NPPF basis for plan-making. (Developers/Planning Consultants)
- Developer supports highways, landscape and visual findings showing the site to be sustainable with limited harm. (Developers/Planning Consultants)

- Concerns that wording on PROW connection is ambiguous and risks undermining deliverability. (Developers/Planning Consultants)
- Suggestion that boundary extension to include northern parcel would enhance design, landscaping and integration. (Developers/Planning Consultants)

Calls For:

- Clarify or remove PROW connection requirement to protect deliverability. (Developers/Planning Consultants)
- Extend allocation boundary to include the northern parcel for improved scheme layout. (Developers/Planning Consultants)
- Correct plan-making basis for national policy compliance. (Developers/Planning Consultants)

SD15: Development allocation at Dunkeswell

Total responses: 1

Dunk_05 – Broomfields

Total responses: 1

Main Issues:

- The Otter Valley Association objects that Dunk_05 (43 homes) lies inside the National Landscape (NL) and therefore conflicts with policies requiring the highest level of landscape protection. (Community Group)
- Concern that development within the NL or affecting its setting should only occur where harm is avoided and where it demonstrably conserves and enhances the NL's special qualities — which they argue Dunk_05 does not. (Community Group)
- Assertion that major development in a National Landscape is only justified in exceptional circumstances, and Dunk_05 does not meet this threshold. (Community Group)
- Wider concern about cumulative impacts on the River Otter catchment, particularly sewage capacity, stating that adding 1,833 homes across the plan area will worsen an already "dire" situation. (Community Group)

Calls For:

- Remove Dunk_05 from the Local Plan due to its location within the National Landscape and failure to meet the "exceptional circumstances" test. (Community Group)
- Apply NL protection policies consistently so that development avoids harm and contributes to protection and enhancement of landscape character. (Community Group)
- Address sewage capacity issues in the River Otter catchment before allocating further housing. (Community Group)

SD16: Development allocation at East Budleigh

Total responses: 2

Ebud_01 – Land off Frogmore Road

Total responses: 2

Main Issues:

- Representation argues Collins Park is a safer, more appropriate alternative and that Ebud_01 fails Policy AR01 tests. (Individual)
- Concerns about unsafe pedestrian crossing of the B3178 and hazardous vehicle access onto Frogmore Road. (Individual)
- Site lies on Grade 1 farmland and would harm Otter Valley views and conflict with NL policies. (Individual)
- Flooding concerns: Frogmore Road is periodically impassable and near Flood Zone 3. (Individual)
- Otter Valley Association objects as the site is inside the National Landscape. (Community Group)
- Concern that extra homes will worsen sewage issues in the River Otter catchment. (Community Group)

Calls For:

- Reassess alternatives and consider allocating Collins Park instead. (Individual)
- If retained, require crossing improvements, safer access, landscape mitigation, and flood measures. (Individual)
- Remove Ebud_01 due to National Landscape impacts. (Community Group)
- Address sewage capacity issues before allocating development. (Community Group)

SD17: Development allocations at Exton

Total responses: 3

Wood_01 – Land west of Oaklands

Total responses: 0

- No responses were received for this site.

Wood_28 – Land north and east of Exton Farm

Total responses: 2

Main Issues:

- Historic England supports strengthened heritage text. (Historic England)
- DCC requests wording requiring a coordinated access strategy for both Exton sites. (DCC)

- Developer supports allocation and delivery of 39 homes but disagrees with requirement for open space in the northern part; argues only the north-west corner is sensitive to the listed farmhouse. (Developers/Planning Consultants)

Calls For:

- Add coordinated access-strategy text. (DCC)
 - Change open-space requirement to “north-west” only. (Developers/Planning Consultants)
 - Retain strengthened heritage requirements. (Historic England)
-

SD18: Development allocations at Feniton

Total responses: 8

Feni_5 – Land at Burlands Mead

Total responses: 4

Main Issues:

- DCC requests clearer wording to ensure development maximises opportunities for sustainable travel improvements. (Devon County Council)

Calls For:

- Add policy text requiring the allocation to support localised improvements to sustainable transport modes. (Devon County Council)
-

Feni_08 – Land adjacent to Beechwood

Total responses: 8

Main Issues:

- Developer strongly supports allocation, citing site sustainability, deliverability and active outline application progressing positively. (Developers/Planning Consultants)
- No objections or constraints identified in the representations supplied.

Calls For:

- Maintain Feni_08 allocation as drafted. (Developers/Planning Consultants)
-

Otry_20 – Land to the south east of Bridge Cottages (Employment)

Total responses: 0

- No responses were received for this site.
-

SD19: Development allocation at Hawkchurch

Total responses: 1

Hawk_01 – Norton Store

Total responses: 1

Main Issues:

- Developer supports allocation in principle but objects that the site boundary hasn't been expanded, despite evidence the wider land is suitable, available and deliverable. (Developers)
- Argues the wider site could deliver up to 38 homes, including affordable housing, well related to the village. (Developers)
- States SD19 is not justified because it ignores wider site capacity and planning merits. (Developers)
- Objection to new contamination-assessment wording, described as unnecessary duplication of existing validation/NPPF requirements. (Developers)
- Notes the policy does not acknowledge the significant remediation costs implied. (Developers)

Calls For:

- Extend the allocation to include the wider land parcel capable of delivering up to 38 dwellings. (Developers)
- Remove duplicated contamination-assessment text. (Developers)
- Update policy wording to reflect the site's deliverability and contribution to local housing needs. (Developers)

SD20: Development allocations at Kilmington

Total responses: 7

Kilm_09b – Land east of George Lane

Total responses: 5

Main Issues:

- Historic England welcomes text ensuring retention of adequate parking for the listed pub and protection of its setting. (Historic England)
- Historic England recommends further refinement to make policy wording clearer and more consistent with national heritage policy. (Historic England)

Calls For:

- Amend text to emphasise conservation of the heritage significance derived from the pub's setting and boundary planting. (Historic England)

Kilm_10 – Land west and south west of the Old Inn

Total responses: 2

Main Issues:

- Developer objects to requirement to “conserve and enhance the natural beauty of the site,” arguing it exceeds NPPF requirements for development in National Landscapes. (Developers/Planning Consultants)
- Concern that allocation wording may impose overly restrictive local requirements inconsistent with national policy. (Developers/Planning Consultants)

Calls For:

- Amend policy so that design requirements relate to conserving and enhancing the wider protected landscape rather than the site itself. (Developers/Planning Consultants)

SD21: Development Allocation at Musbury

Total responses: 1

Musb_01a – Land at Baxter’s Farm

Total responses: 1

Main Issues:

- Historic England supports new text clarifying design requirements to conserve and enhance settings of heritage assets. (Historic England)

Calls For:

- Keep added heritage protection requirements within the policy. (Historic England)

SD22: Development allocations at Newton Poppleford

Total responses: 4

Newt_04 – Land to the West of Badger Close

Total responses: 3

Main Issues:

- Otter Valley Association objects that Newt_04 lies inside the National Landscape, conflicting with policy OL02 and requiring exceptional-circumstances justification, which they say is absent. (Community Group)
- Concern over worsening River Otter sewage capacity, especially with cumulative growth. (Community Group)
- Woodland Trust notes Newt_04 is adjacent to Ancient Woodland, requiring strong protection measures and wider buffers. (Woodland Trust)
- Developer objects to the fixed 20-dwelling cap, arguing no capacity testing justifies it and that it conflicts with efficient-use-of-land policy DS02. (Developers/Planning Consultants)

Calls For:

- Remove or reconsider Newt_04 because it is inside the National Landscape. (Community Group)
- Ensure policies protect adjacent Ancient Woodland with significant buffers (min 50m) and appropriate wording. (Woodland Trust)
- Change policy wording to “around 20 dwellings” to introduce flexibility and allow efficient land use. (Developers/Planning Consultants)

Newt_05 – Land to the East of Exmouth Road

Total responses: 3

Main Issues:

- Otter Valley Association objects as Newt_05 is also inside the National Landscape, again requiring exceptional-circumstances justification they say is missing. (Community Group)
- Concern over worsening River Otter sewage capacity, especially with cumulative growth. (Community Group)
- Woodland Trust states Newt_05 is adjacent to Ancient Woodland, requiring review and stronger habitat-protection wording. (Woodland Trust)
- Developer objects to the fixed allocation of 20 dwellings, arguing it lacks evidence, restricts efficient use of land, could constrain affordable housing delivery, and conflicts with DS02. (Developers/Planning Consultants)

Calls For:

- Reconsider or remove Newt_05 due to National Landscape impacts. (Community Group)
- Add policy clauses ensuring protection and buffering of Ancient Woodland. (Woodland Trust)
- Amend wording to allow flexibility: “around 20 dwellings” rather than a fixed number. (Developers/Planning Consultants)

SD23: Development allocation at Otterton

Total responses: 2

Otto_01 – Land north of Behind Hayes

Total responses: 2

Main Issues:

- Welcomes refines text which resolves previously raised issues. (Historic England)
- Objection to development at Otto_01, stating the site lies within the National Landscape boundary and raising concern about landscape and visual harm. (Otter Valley Association)

- Concerns about Otterton’s sensitivity to development and the need to avoid harm to village character and setting. (Otter Valley Association)

Calls For:

- Reconsider or remove Otto_01 due to its position within the National Landscape and associated landscape sensitivity. (Otter Valley Association)

SD24: Development allocation at Payhembury

Total responses: 5

Payh_03a – Land adjacent to Markers Park

Total responses: 5

Main Issues:

- Developer strongly supports allocation for ~15 homes and says the site is suitable, deliverable and supports village facilities. (Developers)
- Developer argues the allocation boundary is too tight and should be expanded to match their Indicative Layout Plan. (Developers)
- Parish Council objects: 15 homes = 12% village increase; recent growth already significant. (Parish Council)
- Infrastructure concerns: sewage overflows, full primary & secondary schools, stretched GP/dentist capacity. (Parish Council)
- Transport issues: single-track lanes, no bus service, unsafe access on blind bend. (Parish Council)
- Environmental concerns: protected mature oaks, bat species, and rising land causing high visibility of development. (Parish Council)
- Residents highlight dangerous access, marshy ground, springs, drainage problems and protected hedgerows. (Residents)
- Residents note the site was judged unsuitable in 2022, with no change in constraints. (Individuals)

Calls For:

- Amend boundary to allow proper access, open space and landscape mitigation. (Developers)
- Change wording to “around 15 homes” for flexibility. (Developers)
- Remove or reconsider allocation due to infrastructure limits, unsafe access and environmental impacts. (Parish Council; Residents)
- Protect trees/hedgerows and fully address springs, drainage and highways issues if allocation proceeds. (Individuals)

SD25: Development allocation at Plymtree

Total responses: 1

Plym_03 – Land north of School

Total responses: 1

Main Issues:

- Historic England supports strengthened policy wording to ensure conservation and enhancement of heritage asset settings. (Historic England)

Calls For:

- Retain updated heritage-led design wording in policy. (Historic England)
-

SD26: Development allocation at Sidbury

Total responses: 9

Sidm_34 – Land south of Furzehill

Total responses: 9

Main Issues:

- Developer strongly supports allocation and highlights pending outline application for 43 dwellings consistent with draft policy. (Developers/Planning Consultants)
- Support from DCC for clearer text regarding delivery of the Sidbury–Sidford cycle route. (Devon County Council)
- Sid Vale Association raises concerns regarding National Landscape protection, flood risk, heritage impacts, and drainage requirements. (Residents/Community Group)
- Concerns that adequate drainage must rely on public sewers rather than off-highway runoff systems. (Residents/Community Group)
- Concern raised about achieving 20% BNG on a sloping agricultural site with existing flood issues. (Residents/Community Group)

Calls For:

- Retain allocation and ensure cycle route delivery forms part of early phases. (Developers/Planning Consultants)
 - Address flood risk concerns through public sewer connection and robust drainage design. (Residents/Community Group)
 - Ensure heritage assessment addressing proximity to Sidbury Castle is secured before permission. (Residents/Community Group)
 - Confirm BNG and drainage mitigation are achievable prior to development. (Residents/Community Group)
-

SD27: Development allocation at Tipton St John

Total responses: 0

Otry_04 – Land South of Otter Close

Total responses: 0

- No responses were received for this site.

SD28: Development allocations at West Hill

Total responses: 0

West_04 – Land adjoining Windmill Lane

Total responses: 0

- No responses were received for this site.

West_18 – Land north and east of Eastfield

Total responses: 0

- No responses were received for this site.

Strategic Policy: SD29: Development allocations at Whimble

Total responses: 17

Whim_08a – Land West of Bramley Gardens

Total responses: 1

Main Issues:

- Historic England supports additional text requiring archaeological assessment before development commences. (Historic England)

Calls For:

- Retain strengthened archaeological assessment wording. (Historic England)

Whim_11 – Land at Station Road (Old Cricket Ground)

Total responses: 5

Main Issues:

- Historic England supports strengthened policy wording to ensure design conserves and enhances the setting of heritage assets. (Historic England)
- Developer (DABB Partnership) supports allocation of Whim_11 and confirms the principle of development is acceptable. (Developers/Planning Consultants)
- Developer notes that some new text duplicates existing policy requirements (e.g., AR01, HE02) and may be unnecessary. (Developers/Planning Consultants)

- Concerns raised that development at Whim_11 could contribute to downstream flooding, with residents stating properties below the site are already susceptible and flood risk has not been adequately addressed. (Residents)
- Residents argue that sites liable to flood should not be allocated even with an FRA, as mitigation may fail and affected households would have no recourse. (Residents)

Calls For:

- Retain allocation of Whim_11 but remove duplicated policy wording that restates higher-level requirements. (Developers/Planning Consultants)
 - Ensure detailed flood-risk assessment fully addresses downstream impacts and demonstrates robust mitigation. (Residents)
 - Consider dismissing the allocation if flooding risks cannot be conclusively addressed prior to allocation. (Residents)
 - Retain strengthened heritage-led design wording. (Historic England)
-

6. Mitigating Climate Change

Total responses: 42

CC01 – Climate Emergency

Total responses: 9

Main Issues:

- Many respondents state the policy is too vague, unclear what development must actually do, and duplicates later policies. (Planning consultants; Developers)
- Several representations say CC01 should be introductory text only, not a policy. (Planning consultants; Developers)
- Some object that CC01 conflicts with national guidance and should not set standards beyond Building Regulations. (HBF)
- Community groups say CC01 should require net-zero development, not “support movement to net-zero”. (Otter Valley Association; Residents)
- Requests to include LNRS and BNG as climate-mitigation tools. (Resident)

Calls For:

- Convert CC01 into introductory text, not policy wording. (Planning consultants; Developers)
 - Require new development to be net-zero and ensure carbon-positive development offsets emissions in real time. (Community groups)
 - Add LNRS/BNG references as climate-mitigation mechanisms. (Resident)
-

CC02 – Net-Zero Carbon Development

Total responses: 8

Main Issues:

- Repeated objections that CC02 goes beyond Building Regulations, contrary to national policy and Written Ministerial Statements. (Developers; HBF)
- Developers say the policy requires detailed design evidence too early, which is unrealistic at outline stage. (Planning consultants; Developers)
- Lack of viability evidence to support going beyond the Future Homes Standard. (Developers; HBF)
- Concern from community group that CC02 should require technologies now, not just allow retrofit. (Otter Valley Association)
- Exmo_20 promoter supports low-carbon intent but warns the policy needs flexibility for strategic sites. (3West)

Calls For:

- Align CC02 strictly with Building Regulations and the Future Homes Standard, not draft standards. (Developers; HBF)
- Allow detailed carbon/energy information to be provided later by condition, not at outline stage. (Developers)
- Remove CC02 entirely as duplicative/unjustified. (Some developers)
- Strengthen CC02 to require all achievable technologies to be installed upfront. (Community group)

CC03 – Promoting Low Carbon and Renewable Energy

Total responses: 2

Main Issues:

- Historic England welcomes removal of mapped wind areas but says the revised policy still needs stronger heritage safeguards, especially for larger turbines. (Historic England)
- Some community support for the revised final paragraph wording. (Otter Valley Association)

Calls For:

- Add explicit requirement to assess impacts on designated & non-designated heritage assets. (Historic England)
- Require Heritage Impact Assessment + Landscape & Visual Impact Assessment with visualisations for wind proposals. (Historic England)

CC04 – Energy Storage

Total responses: 3

Main Issues:

- Otter Valley Association suggests strengthening wording to “minimises reliance on fossil fuels” rather than “reduces”. (Otter Valley Association)

- Battery storage developers say the policy is too vague on where storage is acceptable; needs spatial clarity and evidence-based mapped areas. (Individual)

Calls For:

- Use evidence from the Greater Exeter Low-Carbon Evidence Base to identify suitable areas for energy storage. (Individual)
- Strengthen fossil-fuel minimisation wording. (Community group)

CC05 – Heat Networks

Total responses: 6

Main Issues:

- Multiple developers argue policy is undeliverable, as connection to heat networks is outside developer control. (Developers/Promoters)
- Concerns over cost, lack of consumer protections, and uncertainty about decarbonisation of existing networks (e.g. Cranbrook). (Developers; HBF)
- Some community groups argue CC05 should go further and create a presumption in favour of heat networks, not only feasibility assessment. (Otter Valley Association)
- Lack of clarity over where heat networks exist. (Developers)

Calls For:

- Remove policy entirely as unjustified. (Developers; HBF)
- If retained, map heat-network locations and add flexibility for site-by-site feasibility. (Developers)
- Strengthen CC05 to explicitly favour establishing new networks. (Community group)

CC06 – Embodied Carbon

Total responses: 7

Main Issues:

- Some developers say CC06 is not justified and duplicates national responsibilities; request deletion. (Developers/Promoters)
- Others support the principle but warn many emissions are outside developer control, and assessments may not be practical at outline stage. (Planning consultants)
- Concerns about monitoring, feasibility, and impacts on viability/housing delivery. (HBF; Planning consultants)
- Otter Valley Association welcomes CC06 but asks how embodied carbon counts toward the 2040 net-zero target.
- Residents raise concerns about PFAS in drainage and the role of existing buildings in reducing embodied carbon.

Calls For:

- Delete CC06 entirely. (Developers; HBF)

- Provide transitional periods and clearer monitoring processes. (HBF)
- Clarify stage at which assessments are required; allow targets at outline, detail at reserved matters. (Planning consultants)
- Address how embodied carbon contributes to the 2040 net-zero pathway. (Community group)

7. Adapting to Climate Change

Total responses: 66

AR01: Flooding

Total responses: 21

Main Issues:

- Repeated concern that AR01 is not aligned with the updated NPPF (Dec 2024) paragraph 175 on the Sequential Test; requires a full review. (Planning consultants, Developers)
- Policy unclear on when the Sequential Test applies (e.g., POS in flood zones doesn't require it). (Developers)
- Requirement for SuDS to reduce runoff below greenfield rates is said to misinterpret DCC guidance (which requires not exceeding greenfield). (Developers)
- Some say AR01 is overly prescriptive, adds onerous requirements and affects viability. (Planning Consultants, Developers)
- Surface water flooding concerns raised, stating EA fluvial zones alone are insufficient. (Residents)
- Need to reference Critical Drainage Areas and forthcoming updated CDA guidance. (Environment Agency)
- Calls for AR01 to address all climate-change adaptation (heat, storms, shading, hardstanding) not only flooding. (Community groups)
- Concerns that SuDS tanks may introduce PFAS. (Individual)

Calls For:

- Update AR01 to align fully with updated NPPF paragraph 175. (Developers; Planning consultants)
- Clarify Sequential Test requirements and apply proportionately. (Developers)
- Reword SuDS requirements to reflect DCC guidance: do not exceed greenfield rates, not "below". (Developers)
- Include CDA-specific wording; highlight that CDA standards take precedence. (Environment Agency)
- Strengthen policy to require SuDS and permeable hardstanding. (Community groups)
- Expand AR01 to wider climate-adaptation matters (heat, storms, shade, green spaces). (Community groups)

- Remove new additions considered overly onerous (e.g., 5m FZ2 buffer, car-park restrictions). (Developers)

AR02: Water Efficiency

Total responses: 33

Main Issues:

- Many argue the policy is not justified, as East Devon is not a designated water-stress area, so requiring 110 l/p/d lacks evidence.
- Widespread concern that the Water Cycle Study is incomplete or inaccurate, making the policy's basis unclear.
- Significant worries about sewage treatment capacity (Honiton, Feniton, Fluxton, Otterton, Maer Lane), with claims that growth cannot proceed until upgrades occur.
- Developers say the policy places responsibilities on them (e.g. proving network capacity) that sit legally with South West Water, not applicants.
- Several representations say the policy wording is too vague or duplicative of existing legislation (risk assessments, Appropriate Assessment, water-environment enhancement).
- Community groups want the policy to be stronger, with no opt-outs and stricter water efficiency.
- Calls for AR02 to reference national SuDS standards and integrated water management.
- Requests for no further housing load in key constrained catchments (Honiton, Feniton, Fluxton) until treatment deficits are addressed.

Calls For:

- Remove or soften the 110 l/p/d requirement, or align it with Building Regulations unless robust evidence is provided.
- Introduce clear phasing/Grampian conditions so development cannot be occupied before wastewater upgrades.
- Amend AR02 so developers are not required to evidence sewer/water capacity.
- Strengthen policy to require effective water-efficiency, storage and recycling measures.
- Add explicit links to national SuDS standards, integrated water management and catchment-wide mitigation.
- Include specific restrictions on development in over-capacity catchments until infrastructure is upgraded.
- Improve monitoring: use consistent metrics, require transparent spill data, and link phasing to SWW's AMP/DWMP timelines.

AR03: Coastal Change Management Areas (CCMAs)

Total responses: 2

Main Issues:

- EA supports approach but requests minor clarifications in terminology and mapping of two CCMA's (Seaton and Beer). (Environment Agency)
- Calls for stronger protection: no development on land likely needed for rollback or future coastal processes. (Community groups)
- Some feel language around short/medium/long-term risk could mislead (risk does not "go away"). (Environment Agency)

Calls For:

- Reinstate or extend CCMA areas at Seaton and Beer as per EA mapping suggestions. (Environment Agency)
- Include clear policy preventing development where rollback corridors or natural coastal processes must be protected. (Community groups)
- Provide supplementary guidance for decision-making in CCMA's. (Environment Agency)

AR04: Relocation of Uses Affected by Coastal Change

Total responses: 0

- No responses were received for this site.

AR05: Development Affecting Coastal Erosion

Total responses: 1

Main Issues:

- Historic England welcomes added text clarifying interaction with Policy PB10 for the Jurassic Coast WHS.

Calls For:

- No additional changes requested.

8. Meeting Housing Needs

Total responses: 94

HN01 – Housing to Address Needs

Total responses: 8

Main Issues

- Concern that the plan should meet full housing need, not just the 80% transitional minimum; some say 20,909 homes is too low and risks under-provision. (Planning consultants; Landowners/Developers)

- Others question the overall housing number, arguing it relies too heavily on inward migration and insufficient local justification. (Community group – Otter Valley Association)
- Some residents argue that large-scale development is contradictory to landscape protection and does not address local affordability issues. (Individuals)
- Comments that housing need assessments must include local market evidence, not only district-wide datasets. (Planning consultants)
- Some note practical concerns about whether the plan period is long enough to meet NPPF requirements. (Planning consultants)

Calls For

- Plan for 100% of housing need, not the 80% transitional figure. (Planning consultants; Landowners/Developers)
- Reassess the housing target to reduce pressure on National Landscape areas. (Community groups – OVA)
- More explicit use of localised evidence, including sales data. (Planning consultants)
- Extend the plan period so it remains compliant with NPPF requirements. (Planning consultants)

HN02 – Affordable Housing

Total responses: 24

Main Issues

- Many argue the affordable housing percentages (30–35%, 25% Axminster, 40% Marcombe aspiration) lack clear justification and do not reflect viability evidence. (Planning consultants; Landowners/Developers)
- Repeated concerns that the 40% aspiration at Marcombe is unrealistic without public subsidy. (Planning consultants; Individuals)
- Housing associations highlight issues with perpetuity requirements, pepper-potting and unclear clustering expectations. (Public body – South West Housing Association Planning Consortium)
- Developers argue the evidence base does not justify area-based percentage differences across the district. (Landowners/Developers)
- Community groups argue the % is too low and should be higher, given identified need of 11,000+ affordable homes. (Community groups – OVA)
- Concerns about a lack of whole-plan viability testing. (HBF)

Calls For

- Provide robust viability evidence supporting each % requirement and area-based differences. (Planning consultants; Landowners/Developers)
- Reword Marcombe requirement to specify a minimum viable percentage with subsidy used only to uplift. (Planning consultants)

- Retain or increase affordable housing levels in high-value coastal towns. (Community groups – OVA)
- Clarify clustering expectations and define “small clusters”. (Public body – SWHAPC)
- Allow flexibility in tenure mix based on market evidence. (Planning consultants)

HN03 – Housing for Older People

Total responses: 12

Main Issues

- Large number of developers argue that the requirement for 10% specialist older persons housing on sites of 200+ homes is too rigid and not evidence-based. (Planning consultants; Landowners/Developers)
- Repeated concern that many sites are not suitable for older person accommodation due to access, topography, or distance to services. (Planning consultants; Landowners/Developers)
- Viability concerns raised due to additional design obligations and specialist needs. (Planning consultants; HBF)
- Lack of clarity on what constitutes “specialist older person dwellings”. (Planning consultants)
- Community groups support the principle but request more small homes generally. (Community groups – OVA)

Calls For

- Require older persons housing only where evidence of need, market demand, and viability is demonstrated. (Planning consultants; Landowners/Developers)
- Allow targeted allocations for older persons housing rather than a blanket site-wide rule. (Planning consultants)
- Clarify definition of “specialist older persons accommodation”. (Planning consultants)
- Ensure locational criteria (400m to shops, transport, level access) are realistically achievable. (Individuals)

HN04 – Accessible and Adaptable Housing

Total responses: 19

Main Issues

- Widespread concern that 50% M4(2) requirement is too high and not justified by the evidence base (which some say indicates ~17% need). (Planning consultants; Landowners/Developers)
- Strong objections to increasing M4(3) affordable housing requirement from 5% to 15%; significant viability implications. (Planning consultants; Landowners/Developers; HBF)

- Topography, parking requirements, and lift implications make M4 standards difficult on many sites. (Planning consultants)
- Housing associations support engagement but raise concerns about cost and feasibility. (Public body – SWHAPC)
- Some note that Government intends to mandate M4(2) nationally, reducing the need for local policy repetition. (Public body – DCC; HBF)

Calls For

- Reduce M4(2) requirement to 20–30%. (Planning consultants; Landowners/Developers)
- Reduce M4(3) requirement or make it strictly evidence-based. (Planning consultants; HBF)
- Add policy flexibility where technical or viability constraints arise. (Planning consultants)
- Exclude flats, 1-bed units and self-build/custom-build plots. (Planning consultants)

HN05 – Self-Build and Custom Build Housing

Total responses: 17

Main Issues

- Very strong and consistent concern that the 5% requirement on all sites of 20+ homes is unjustified and will harm deliverability. (Planning consultants; Landowners/Developers; HBF)
- Issues highlighted around construction sequencing, health & safety, and leaving unsold plots vacant. (Planning consultants; HBF)
- Many argue demand is too variable and better delivered on dedicated self-build sites, not part of larger schemes. (Planning consultants; Landowners/Developers)
- Concerns about marketing period (24 months), unsold plots, and requiring affordable self-build on 250+ schemes. (Landowners/Developers)
- Housing associations warn that requiring self-build plots on 100% affordable schemes makes them undeliverable. (Public body – SWHAPC)

Calls For

- Remove or revise the 5% requirement; use evidence-led demand triggers instead. (Planning consultants; HBF)
- Reduce marketing period to 6–12 months. (HBF; Developers)
- Exempt 100% affordable schemes and schemes where no demonstrable demand exists. (Public body – SWHAPC)
- Prefer allocation of specific self-build sites, not blanket requirements. (Planning consultants; Landowners/Developers)

HN06 – Sub-dividing or Replacing Existing Buildings and Dwellings

Total responses: 2

Main Issues

- Concern that assumptions about single people being housed in shared accommodation are inappropriate and not inclusive. (Individuals)
- Comments that overly strict controls on replacement/subdivision sizes may inhibit investment in older rural properties. (Individuals)

Calls For

- Provide options such as flatlets, soundproofed medium-rise, and more flexible models to support neurodivergent/introverted residents. (Individuals)
- Allow replacement/subdivided dwellings to exceed size limits where justified. (Individuals)

HN07 – Householder Annexes, Extensions, Alterations or Outbuildings Outside Settlement Boundaries

Total responses: 1

Main Issues

- Only one representation: Historic England supports the policy. (Public body – Historic England)

Calls For

- None (all supportive).

HN08 – Hostels and Houses in Multiple Occupation (HMOs)

Total responses: 0

- No responses were received for this policy.

HN09 – Gypsy and Traveller Sites

Total responses: 2

Main Issues

- Respondents raise no objections to Policy HN09, agreeing that East Devon District Council can meet the identified needs of Gypsies, Travellers and Travelling Showpeople within its own district boundary. (Public body – Somerset Council; Public body – Dorset Council; Public body – Devon County Council)
- It is confirmed that there are no unresolved cross-boundary issues associated with Gypsy, Traveller and Travelling Showpeople provision under the approach set out in the Plan. (Public body – Dorset Council; Public body – Devon County Council)

Calls For

- Continue engagement under the Duty to Cooperate, particularly as Somerset Council’s Gypsy and Traveller Accommodation Needs Assessment is expected to be completed in early 2026. (Public body – Somerset Council)
- Retain the current joint-working approach with neighbouring authorities on Gypsy, Traveller and Travelling Showpeople provision, as described in the Plan. (Public body – Dorset Council; Public body – Devon County Council)

HN10 – Rural Housing Exception Sites

Total responses: 0

- No responses were received for this policy.

HN11 – Housing for Rural Workers

Total responses: 1

Main Issues

- Strong objections to the 150m² size cap, considered unjustified and too restrictive for family farms, multigenerational living, apprentices, and operational needs. (Planning consultants – Acorus; Individuals)
- Concern that it undermines design quality and functionality. (Planning consultants)

Calls For

- Replace 150m² cap with wording allowing size commensurate with needs of the holding. (Planning consultants)
- Allow larger replacements/extensions where justified and appropriate to setting. (Individuals)

9. Supporting the Economy and Town Centres

Total responses: 3

SE01 – Employment development within settlement boundaries

Total responses: 0

- No responses were received for this policy.

SE02 – Employment development in the countryside

Total responses: 9

Main Issues

- Developers and landowners argue the policy is overly restrictive, as it limits growth strictly to existing operational boundaries and prevents expansion of successful rural businesses. (Landowner/Developers)

- Policy is said to conflict with NPPF paragraphs 85–86, which require flexible, responsive economic growth policies. (Planning consultants)
- Calls that the policy is unclear about what “socially and environmentally acceptable” means and lacks environmental safeguards. (Public body – Blackdown Hills National Landscape)
- Environmental bodies say the policy should require biodiversity enhancement, not just avoidance of harm. (Public body – Devon Wildlife Trust)
- Environment Agency supports the drainage requirements but requests clarity and reference to SSAFO regulations. (Public body – Environment Agency)
- Heritage impacts of new agricultural buildings need stronger policy wording. (Public body – Historic England)
- Individuals question whether EDDC has the resources to monitor compliance. (Individuals)
- Community groups suggest the policy should require carbon-reducing technologies and water efficiency in new agricultural buildings. (Community groups – Otter Valley Association)

Calls For

- Allow expansion “within or adjacent to” operational boundaries where economic need is demonstrated. (Landowner/Developers)
- Add specific wording requiring biodiversity enhancement, not just neutrality. (Public body – Devon Wildlife Trust)
- Add heritage references to clause A to protect historic farmsteads. (Public body – Historic England)
- Clarify expectations for “environmental acceptability” or mirror SE01 wording on amenity impacts. (Public body – Blackdown Hills National Landscape)
- Require carbon-reducing technologies and water-efficiency measures. (Community groups – Otter Valley Association)
- Clarify drainage wording and reference SSAFO regulations. (Public body – Environment Agency)

SE03 – Farm diversification

Total responses: 0

- No responses were received for this policy.

SE04 – Resisting the loss of employment sites

Total responses: 2

Main Issues

- Concern that a rigid approach to preventing loss of hotels/B&Bs is unrealistic, given structural decline in small hospitality businesses and competition from short-term lets. (Community groups – Sid Vale Association)
- Fear that the policy will create vacant buildings and stagnation within conservation areas if change of use is effectively prohibited. (Community groups – Sid Vale Association)

Calls For

- Introduce a viability test and/or marketing period to justify loss of tourist accommodation. (Community groups – Sid Vale Association)
- Support change of use to residential where continued hotel/B&B use is unsustainable. (Community groups – Sid Vale Association)

SE05 – Employment and Skills Statements

Total responses: 4

Main Issues

- Some residents doubt the practicality of requiring developers to deliver local skills/employment benefits, arguing large national contractors typically use established regional workforces. (Individuals)
- Some support the overall social-value aim but say the policy's requirement to submit statements at application stage is unrealistic for multi-stage/outline schemes. (Landowner/Developers)
- Individuals highlight the need to include support for skills in managing SUDS/NBS and common areas. (Individuals)
- Some note updated guidance now exists on what statements must contain. (Planning consultants)

Calls For

- Allow the Employment & Skills Statement to be secured by condition, submitted prior to commencement when construction value is known. (Landowner/Developers)
- Include support for training connected to site maintenance, SUDS and nature-based solutions. (Individuals)

SE06 – Town centre hierarchy

Total responses: 1

Main Issues

- The retail hierarchy is placed in supporting text rather than the policy; this causes confusion. (Planning consultants)

- Text does not fully reflect NPPF support for diversification and broader town centre uses beyond retail. (Planning consultants)
- Sequential test elements duplicate SE07. (Planning consultants)

Calls For

- Move the hierarchy from paragraph 9.32 into the policy itself. (Planning consultants)
- Update text to reflect NPPF paragraphs 90(a)–(b) and the need for diversified town centres. (Planning consultants)
- Delete duplicated sequential-test wording already covered in SE07. (Planning consultants)

SE07 – Town centre development, sequential approach and impact assessment

Total responses: 3

Main Issues

- Strong objection from Co-op that the Primary Shopping Area (PSA) and Town Centre Area (TCA) for Axminster are inaccurately drawn, including large areas of predominantly residential streets. (Planning consultants)
- Current PSA/TCA does not reflect where retail is actually concentrated, conflicting with NPPF definitions. (Planning consultants)
- Policy overly restricts town centre uses by prioritising only retail/leisure, contrary to NPPF Annex 2. (Planning consultants)
- Restrictions on residential uses within PSAs are inconsistent with NPPF paragraph 90(f) recognising housing as supporting vitality. (Planning consultants)

Calls For

- Redraw PSA and TCA boundaries to reflect actual concentrations of town centre uses. (Planning consultants)
- Amend second paragraph to support all main town centre uses, not only retail/leisure. (Planning consultants)
- Allow residential at ground floor where appropriate, subject to demand evidence. (Planning consultants)
- Update supporting text (paras 9.37, 9.39) to reflect NPPF support for flexibility and diversification. (Planning consultants)

SE08 – Local shops and services

Total responses: 0

- No responses were received for this policy.
-

SE09 – Rural shops outside of towns and villages

Total responses: 0

- No responses were received for this policy.

SE10 – Sustainable tourism

Total responses: 4

Main Issues

- Policy considered overly restrictive, as loss of visitor accommodation is only permitted in “exceptional circumstances”. (Planning consultants)
- Evidence base cited in footnote 85 (marketing/viability guidance) relates only to employment uses, not tourism accommodation. (Planning consultants)
- Policy lacks flexibility to respond where holiday parks are no longer viable or appropriate due to location, facilities or adjoining residential areas. (Planning consultants)
- Reference to “low-cost staff accommodation” as an example of exceptional circumstances lacks evidence and is too narrow. (Planning consultants)
- Individuals request inclusion of rural/heritage crafts in policy support. (Individuals)

Calls For

- Replace “exceptional circumstances” test with requirement to demonstrate no ongoing need for holiday accommodation. (Planning consultants)
- Remove reference to low-cost staff accommodation. (Planning consultants)
- Produce updated viability/marketing guidance specific to tourism uses. (Planning consultants)
- Add support for rural/heritage crafts. (Individuals)

SE11 – Holiday accommodation parks in designated landscapes

Total responses: 0

- No responses were received for this policy.

10. High Quality Design

Total responses: 25

DS01 – Design and local distinctiveness

Total responses: 10

Main Issues

- Desire for stronger recognition of traditional vernacular architecture as a core design approach. (Individuals)

- Concerns about requiring NDSS for all homes without clear evidence of need or viability. (Planning consultants)
- Objection to treating SPDs as Local Plan policy. (HBF)
- Worry that national developers produce generic, non-distinctive house types. (Individuals)
- Welcome for new text on appropriate lighting in sensitive landscapes. (Individuals; Public body – Historic England)
- Concern that references to National Landscape design guidance have been lost. (Public body – Blackdown Hills NL)

Calls For

- Embed and prioritise traditional vernacular design in policy and design codes. (Community groups)
- Re-examine justification for NDSS and apply only where evidence supports it. (Planning consultants)
- Remove SPD references from policy text. (HBF)
- Reinstate reference to National Landscape-specific guidance. (Public body – Blackdown Hills NL)

DS02 – Housing density and efficient use of land

Total responses: 8

Main Issues

- Objections to replacing “optimise” with “maximise density”, citing conflict with NPPF and risk of overdevelopment. (Historic England, Individuals)
- Widespread opposition to requiring design codes for 50+ dwellings, considered disproportionate. (Developers)
- Objection to requiring design codes for all sites in or adjacent to National Landscapes, including small schemes. (Planning consultants)
- Calls for clarity on overlap between this policy's design code requirement and SD01 masterplanning. (Planning consultants – Boyer)
- Community objection to development in National Landscapes, calling it inconsistent with national protections. (Individuals)

Calls For

- Revert to “optimise density” wording. (Historic England, Individuals)
- Raise design code threshold to 500 dwellings. (Developers)
- Alternatively, reduce threshold to 35 dwellings to improve design quality in smaller schemes. (Individuals)
- Remove the National Landscape-wide design code requirement. (Planning consultants)

DS03 – Display of advertisements

Total responses: 1

Main Issues

- Support for tighter control of visually intrusive adverts, especially in places like Seaton. (Individuals)

Calls For

- None (supportive representation only)
-

DS04 – Green and blue Infrastructure

Total responses: 2

Main Issues

- Need for clarity on how the plan will apply the full Natural England GI Framework Standards (e.g., Urban Greening Factor, Accessible Greenspace Standards). (Public body – Natural England)
- Policy references only 5 GI principles, whereas the Framework includes 15. (Public body – Natural England)
- Lack of clarity around interaction with mandatory Biodiversity Net Gain, especially stacking. (HBF)

Calls For

- Specify how GI Standards (e.g., UGF benchmarks) will be applied locally. (Public body – Natural England)
 - Clarify policy relationship with BNG requirements. (HBF)
 - Include clear reference to all 15 GI principles. (Public body – Natural England)
-

11. Sustainable Transport and Communications

Total responses: 1

TR01 – Prioritising walking, wheeling, cycling, and public transport

Total responses: 1

Main Issues

- Worry that proposed new roundabout and crossings for Exmo_17 would slow traffic, worsen air pollution on the main busy road to Exmouth. (Individuals)

Calls For

- None specific to policy wording (site-specific objection).
-

TR02 – Protecting transport sites and routes

Total responses: 11

Main Issues

- Support for Sidford–Sidbury strategic cycle network, noting allocation SIDM_06a could help deliver it. (Landowners/Developers – Sidbury Manor Estate)
- Objection to requiring developers to consider transport impacts from uncommitted future developments; requests alignment with national policy (committed development only). (Planning consultants)
- Strong objection to safeguarding the Axminster relief road route, citing no evidence of funding or deliverability. (Landowners/Developers – Persimmon/WainHomes)
- Network Rail states railway role is under-represented; policy lacks reference to station upgrades, improvements to level crossings, Exmouth branch redoubling, service increases, and wider rail improvement priorities. (Public body – Network Rail)
- Support policy but it should reflect any further transport sites and routes identified through ongoing work on the GE Transport Study or the IDP. (Public body – National Highways)
- Suggestion that future rail links to Exeter Airport, Marcombe town centre and Skypark should be planned. (Individuals)
- Minor typographical and formatting errors identified. (Community groups – Sidmouth Cycling Campaign)

Calls For

- Amend policy wording to refer to committed development only. (Planning consultants)
- Remove safeguarding of Axminster relief road due to lack of evidence of deliverability. (Developers – Persimmon/WainHomes)
- Add policy text on rail upgrades: passing loops, redoubling, platform works, station improvements, and level crossings. (Public body – Network Rail)
- Correct typographical errors (e.g., separate “Cranbrook to Exeter (E3)” and “Otter Trail”). (Community groups – Sidmouth Cycling Campaign)
- Consider long-term planning for potential light rail links to major growth areas. (Individuals)

TR03 – Travel plans, transport statements and transport assessments

Total responses: 4

Main Issues

- Policy presumes that all developments must secure new sustainable transport arrangements, whereas existing networks may already be adequate. (Planning consultants)
- Request to reference impacts from committed development only. (Planning consultants)
- Need to consider all-day traffic impacts, not just peaks, consistent with recent case law. (Planning consultants)

- National Highways welcomes strengthened wording requiring transport mitigation where severe impacts remain. (Public body – National Highways)
- Some landowners/developers offer general support. (Landowners/Developers – Lichfields/Blok)

Calls For

- Align policy with NPPF/NPPG; treat it as a validation requirement rather than policy. (Planning consultants)
- Add reference to committed development only. (Planning consultants)
- Include consideration of whole-day traffic effects. (Planning consultants)

TR04 – Parking standards

Total responses: 16

Main Issues

- Widespread objection to EV charging requirements that exceed Building Regulations, especially where justified by Pebblebed Heaths SAC/SPA impacts. (Planning consultants; Developers)
- Concerns policy unfairly requires developers to secure EV uptake among future residents. (Planning consultants; Developers)
- Claims that technical assessments informing EV requirements have not been fully consulted on. (Developers)
- Developers object to blanket requirement of 1.7 spaces per dwelling, seeking site-specific flexibility. (Developers – Vistry)
- Several respondents highlight need for flexibility in counting garages as parking spaces. (Planning consultants)
- Some strongly supportive comments from public bodies on increased EV infrastructure. (Public body – National Highways; DCC)
- Community support for increasing EV provision to reduce reliance on cars near sensitive areas. (Community groups – Otter Valley Association)
- Concern that “should aim to exceed” is vague and unimplementable without a mitigation strategy. (Individuals)

Calls For

- Align EV charging requirements strictly with Building Regulations and remove higher expectations. (Planning consultants; Developers)
- Remove references requiring developers to promote EV uptake. (Developers)
- Introduce parking flexibility, including garage dimensions. (Planning consultants)
- Remove or revise 1.7 spaces per dwelling average standard. (Developers – Vistry)
- Add clarity on how EV standards will apply relative to new air quality mitigation strategy. (Individuals)

TR05 – Aerodrome safeguarded areas and Public Safety Zones

Total responses: 0

Main Issues

- None.

Calls For

- None.
-

TR06 – Digital connectivity

Total responses: 3

Main Issues

- Developers argue requirement for superfast broadband provision on all major sites is too rigid, especially in small or isolated communities where viability is uncertain. (Planning consultants – Boyer; Persimmon Homes)
- Need for proportionate assessment of feasibility and cost. (Planning consultants)
- Para 11.28 minor typographical error spotted (“respectfully” instead of “respectively”). (Community groups – Devon Wildlife Trust)

Calls For

- Require engagement with developers to assess feasibility of broadband delivery. (Planning consultants; Developers)
 - Correct typo.
-

TR07 – Wireless connectivity and telecoms infrastructure

Total responses: 1

Main Issues

- One representation raised concerns about the adequacy of safeguards around telecommunications infrastructure, including references to potential health effects. As part of this, the respondent cited electromagnetic hypersensitivity, which is not recognised as a medical condition in clinical or regulatory guidance. (Individuals)

Calls For

- A request for clearer guidance on assessment, consultation and siting considerations for telecommunications proposals. (Individuals)
-

12. Our Outstanding Landscape

Total responses: 34

OL01: Landscape Features

Total responses: 4

Main Issues

- General support for inclusion of rivers, waterbodies and watercourses. (Individuals)
- Concern that the policy title and wording do not reflect that it covers landscape character (not only features). (Planning consultants)
- Objection that requiring development to “protect and enhance” all features (e.g., a single tree) is unrealistic; positive landscape change could still occur overall. (Planning consultants)
- Desire for clearer expectations around LVIA requirements. (Public body – Blackdown Hills NL)
- Concern that inclusion of water environment issues appears incomplete or inaccurate in later paragraphs (12.3, 12.5). (Community groups – Lymptone Water Quality Group)
- Argument that “would not harm” is an absolute test that makes all development impossible and must be qualified. (Landowner/Developers)

Calls For

- Rename the policy to “Landscape Features and Character”. (Planning consultants)
- Reword so not every individual feature must be preserved if there is an overall landscape betterment. (Planning consultants)
- Strengthen LVIA references to align with GLVIA and Landscape Institute guidance. (Public body – Blackdown Hills NL; Devon County Council)
- Qualify the “no harm” test to allow development with mitigation. (Landowner/Developers)

OL02: National Landscapes (AONBs)

Total responses: 5

Main Issues

- Support for reflecting strengthened duties under the Levelling Up and Regeneration Act. (Public body – Natural England)
- Some support for the overall intent but request clearer wording and justification. (Public body – Blackdown Hills NL)
- Too many allocated housing sites fall within NL boundaries, undermining exceptional circumstances tests. (Community groups – Otter Valley Association, Individuals)
- Requests for terminology to align more closely with NL management plans and NPPF definitions. (Public body – Devon County Council)

Calls For

- Amend “setting or appearance” to “natural beauty, special qualities and key characteristics”. (Public body – DCC; Blackdown Hills NL)
- Add footnote linking to NPPF exceptional-circumstances tests. (Public body – Blackdown Hills NL)

- Reassess NL site allocations against OL02 requirements or remove them altogether. (Community groups, Individuals)

OL03: Coastal Preservation Areas

Total responses: 2

Main Issues

- Developers argue the CPA boundary extensions lack robust justification and rely on desktop mapping, not fieldwork. (Planning consultants)
- Belief that the CPA is being treated as a higher-tier designation than NLs, despite being local only. (Planning consultants)
- Community objections that CPA removal undermines landscape and coastal protection. (Community groups and residents)

Calls For

- Provide stronger evidence for CPA boundaries or allow site-specific evidence to challenge them. (Planning consultants)
- Reinstate CPA for Exmo_17. (Individuals)
- Delete the policy entirely (seen as unjustified duplication of NL protections). (Planning consultants)

OL04: Areas of Strategic Visual Importance

Total responses: 3

Main Issues

- Some developers argue the CPA and view-related elements are unjustified. (Planning consultants)
- Historic England states the text does not adequately protect views contributing to heritage significance despite wording in the supporting text. (Public body – Historic England)
- Requests for improved explanation of how view protection interacts with heritage policy. (Public body – Historic England)

Calls For

- Update supporting text so it clearly states that views can form part of a heritage asset's setting and significance, and rely on existing heritage policy for protection. (Public body – Historic England)
- Delete the entire policy. (Developers)

OL05: Green Wedges

Total responses: 6

Main Issues

- Multiple representations argue the extent of proposed green wedges is too large and not evidence-based. (Landowners/Developers)
- Claim that Council officers recommended much smaller, more targeted green wedge areas, but Members opted to retain the larger ones without evidence. (Landowners/Developers)
- Objections relating to specific areas:
 - East of Exeter Green Wedge considered unjustified and over-extended.
 - Pinhoe Green Wedge inclusion said to lack merit.
 - Ottery St Mary / West Hill Green Wedge considered excessive and contrary to 2024 evidence. (Planning consultants)
- HBF warns wording may unintentionally restrict off-site BNG or SANGs delivery. (HBF)

Calls For

- Reduce green wedge boundaries to align with February 2024 Council officer assessment. (Developers)
- Remove land north of Sowton village and Pinhoe sites from the designation. (Developers)
- Clarify acceptable development within green wedges (e.g., SuDS ponds, footpaths, BNG). (HBF)

OL06: Land of Local Amenity Importance and Local Green Space

Total responses: 0

- No responses were received for this policy.

OL07: Contaminated Land

Total responses: 1

Main Issues

- DCC proposes updated wording to ensure development near waste sites includes assessment of landfill gas, leachate and other hazards in consultation with the waste authority. (Public body – DCC)

Calls For

- Amend policy to reference Devon Waste Plan Policy W10 and clarify assessment requirements. (Public body – DCC)

OL08: Potentially Hazardous Developments and Notifiable Installations

Total responses: 0

- No responses were received for this policy.

OL09: Control of Pollution

Total responses: 0

- No responses were received for this policy.

OL10: Development on High Quality Agricultural Land

Total responses: 5

Main Issues

- Multiple developers argue the policy is unjustified, duplicates NPPF paragraph 187, and lacks evidence. (Developers, Planning consultants)
- Several representations simply request deletion, stating no changes were made from previous drafts. (Developers)

Calls For

- Delete OL10 entirely. (Developers)
- Or redraft it to replicate NPPF paragraph 187 only. (Developers)

13. Our Outstanding Biodiversity and Geodiversity

Total responses: 116

PB01 – Protection of internationally and nationally important wildlife sites

Total responses: 17

Main Issues

- Concern that PB01 restates existing Habitat Regulations and adds unnecessary duplication (Planning Consultants, Developers, HBF; Individuals, Community Groups-Otter Valley Association).
- Lack of clarity on mitigation hierarchy wording and inconsistency with para 13.5 (Individuals).
- Absence of Pebblebed Heaths air quality mitigation strategy prevents proper assessment; policy considered interlinked with PB04 (Individuals).
- Concerns that the Water Cycle Study (WCS) is not robust or evidence-led, undermining PB01 and its ability to rule out adverse effects on integrity (Public Bodies - Environment Agency, Natural England).
- Policy lacks clarity on early consideration of mitigation measures and available Natural England advisory services (Devon Wildlife Trust).

Calls For

- Delete PB01 as unnecessary duplication (Planning Consultants, Developers).
- Clarify and reinstate correct mitigation hierarchy wording (Individuals).

- Provide or await Pebblebed Heaths air quality mitigation strategy before finalising PB01 (Individuals).
- Strengthen WCS evidence and apply precautionary principle (Public Bodies - Natural England, Environment Agency).
- Add reference to Natural England’s Discretionary Advice Service and Pre-Submission Screening (Devon Wildlife Trust).
- Include criteria ensuring proposals do not compromise locally important Red List species (Otter Valley Association).

PB02: Protection of regionally and locally important wildlife sites

Total responses: 4

Main Issues

- WCS considered inadequate, undermining PB02’s ability to ensure no adverse water quality impacts (Public Bodies - Environment Agency; Natural England).
- Policy lacks clarity on interaction with mandatory BNG and wider natural environment policies (HBF).
- Inclusion of Section 41 Habitats (including lowland heathland) triggers need for mitigation hierarchy assessment that has not been undertaken (Individuals).
- Omission of protection criteria for locally important species and ecological linkages (Otter Valley Association).

Calls For

- Update WCS evidence and ensure precautionary approach (Public Bodies - Environment Agency, Natural England).
- Clarify role of PB02 relative to BNG hierarchy and protected species hierarchy (HBF).
- Undertake mitigation hierarchy assessment at plan level before confirming allocations (Individuals).
- Add criteria preventing harm to Red List/BoCC species and key ecological linkages (Otter Valley Association).

PB03 – Protection of irreplaceable habitats and important features

Total responses: 15

Main Issues

- Objections to inclusion of Devon hedges as features equivalent to “important hedgerows” (Planning Consultants).
- Requests to delete “mature trees and hedgerows” from irreplaceable habitats, arguing inadequate justification (Developers).

- Concern that PB03 interacts with Pebblebed Heaths mitigation (via lowland heathland) but strategy absent (Individuals).
- Support for protection of ancient woodland and veteran trees with buffer zones (Natural England).
- Support for inclusion of additional habitats (Individuals).

Calls For

- Remove Devon hedges from PB03; rely on PB08 for hedge management (Planning Consultants).
- Amend PB03 to simplify and remove mature trees/hedgerows from irreplaceable category (Developers).
- Evidence required for mitigation hierarchy assessment before finalising allocations (Individuals).

Enforce minimum buffer zones of 15m for ancient woodland (Natural England).

PB04 – Habitats Regulations Assessment

Total responses: 19

Main Issues

- Concerns over absence of Pebblebed Heaths air quality mitigation strategy (Natural England; RSPB; Individuals; Developers).
- Evidence suggests increased vehicle emissions cannot currently be mitigated, preventing HRA conclusion of “no adverse effect on integrity” (Public Bodies - Natural England, RSPB).
- Policy wording around “unacceptable increases” in emissions deemed vague and weak (RSPB).
- Technical Assessment, Mitigation Strategy, viability evidence seen as inconsistent or incomplete (Developers, Planning Consultants).
- Requirement for assessments, monitoring, and financial contributions unclear and burdensome (Developers).
- Nutrient neutrality requirements for River Axe SAC need greater specificity on which development types must comply (Public Bodies - Natural England).
- SE Devon Wildlife Strategy covers only recreation, yet PB04 implies broader mitigation (Lympstone Water Quality Group).

Calls For

- Publish and secure full Pebblebed Heaths Air Quality Mitigation Strategy before submission (Natural England; RSPB; Developers).
- Replace "unacceptable increases" with wording tied to "adverse impacts on designated features" (RSPB).

- Update emissions modelling using correct traffic assumptions including revised access arrangements (Individuals).
- Clarify nutrient neutrality wording and specify affected development types (Natural England).
- Remove references to preliminary or untested mitigation measures (Developers)
- Amend PB04 to accurately distinguish recreational mitigation from air/water quality mitigation (Lympstone Water Quality Group).

PB05 – Biodiversity Net Gain

Total responses: 33

Main Issues

- Widespread objection to 20% BNG requirement as unjustified, inconsistent with statutory 10% national minimum, and harmful to viability/delivery. (Landowners/Developers, Planning Consultants)
- PPG and draft NPPF state higher BNG only permissible where site-specific and fully justified; EDDC evidence does not meet this threshold (Multiple respondents).
- Concerns that 20% will reduce affordable housing delivery, undermine viability of major allocations, or constrain urban sites (Landowners/Developers).
- Existing evidence cited (nature assets, designations) not seen as sufficient justification (Landowners/Developers).
- 20% BNG on greenfield sites expected to require extensive land take or off-site credits, which are scarce in East Devon (Landowners/Developers).
- Some support for 20% requirement given East Devon's high ecological value (Natural England).
- Calls for consistent delivery hierarchy differentiation from protected-species mitigation hierarchy (HBF).
- Some representations seek even stronger BNG implementation (Otter Valley Association).

Calls For

- Reduce requirement to statutory 10% (Landowners/Developers).
- Delete PB05 entirely (Landowners/Developers).
- Maintain 20% requirement (Natural England; Otter Valley Association), but with strengthened enforcement and no exemptions.
- Provide full justification, viability testing, and allocation-level evidence before retaining any uplift (Landowners/Developers).
- Clarify hierarchy differences (HBF).
- Update policy to reflect DEFRA changes (sites <0.2ha exempt; SSM metric) (HBF).

PB06 – Local Nature Recovery Strategy and Nature Recovery Network

Total responses: 5

Main Issues

- Concern that prioritising all off-site BNG within NRN is inconsistent with national BNG spatial risk multiplier rules. (Landowners/Developers, Planning Consultants)
- Policy wording seen as unclear or ineffective given PB05 already covers BNG. (Landowners/Developers, Planning Consultants)
- LNRS wording around “mitigation in the form of biodiversity improvements” potentially confusing (Natural England).
- Restricting off-site BNG to NRN areas may limit options and undermine feasibility (Developers).

Calls For

- Amend wording to clarify enhancements, not mitigation (Natural England).
- Remove restriction requiring all off-site BNG to be within NRN (HBF; Cherwell Group).
- Delete PB06 entirely (Co-op Group).
- Support noted where LNRS alignment assists specific allocations (Lichfields – Otry_21).

PB07 – Ecological enhancement and biodiversity in the built environment

Total responses: 9

Main Issues

- Policy considered overly prescriptive and lacking flexibility (Developers).
- Need for clarity on relationship with mandatory BNG (HBF).
- Support for integrated swift brick requirement (Community Group).
- Added wording “or others of equivalent value” seen as too vague (Community Group).
- Some call for mandatory swift boxes across all appropriate developments (Otter Valley Association).

Calls For

- Provide flexibility so enhancements reflect site context (Developer; Bloor Homes).
- Clarify how PB07 interacts with BNG policy (HBF).
- Amend “equivalent value” wording to “...as agreed by the local authority” (Community Group).
- Make swift bricks mandatory in suitable buildings (Otter Valley Association).

PB08 – Trees, hedges and woodland on development sites

Total responses: 5

Main Issues

- Policy considered overly detailed, duplicative of PB03, and unclear in relation to BNG and tree metrics. (Landowners/Developers)
- Concerns about climate-appropriate native species selection (Otter Valley Association).
- Interaction with emerging NE Urban Canopy Cover Standard requires clarification (Natural England).

Calls For

- Simplify PB08 and avoid duplication with PB03 (Developers).
- Clarify relation between tree requirements and BNG calculations (HBF).
- Explicitly reference climate-appropriate native species (Otter Valley Association).
- Integrate Urban Canopy Cover Standard where Council intends to use it (Natural England).

PB09 – Monitoring requirements for new planting schemes

Total responses: 11

Main Issues

- Concerns that annual inspection reports for five years are unjustified and burdensome where land transferred to management companies (Developers).
- Calls to delete PB09 as unnecessary given existing S106 and enforcement routes (Developers).
- Some regret at removal of original financial assurance bond which Natural England considered potentially valuable (Public Bodies - Natural England).

Calls For

- Delete PB09 entirely (Developers).
- Remove mandatory annual inspection requirement or apply case-by-case (Developers).
- Consider retaining financial assurance through supplementary guidance, not policy (Natural England).

PB10 – Protection and enhancement of the Jurassic Coast World Heritage Site

Total responses: 1

Main Issues

- No issues raised. Representation expresses support for the additional text requiring reference to UNESCO’s Guidance and Toolkit when assessing impacts on the World Heritage Site (Public Body – Historic England).

Calls For

- No changes requested. Historic England confirms the amendment fully addresses their previous Regulation 19 concern (Public Body – Historic England).

PB11 – Protection of designated geological sites

Total responses: 0

- No responses were received for this policy.

PB12 – Regionally Important Geological and Geomorphological Sites

Total responses: 0

- No responses were received for this policy.

14. Open Space and Sports and Recreation

Total responses: 19

OS01: Access to open space and recreation facilities

Total responses: 4

Main Issues

- Objection that the policy contains onerous, unjustified and unclear requirements for non-residential schemes and developments over 200/300 homes (Planning Consultants, Developers).
- Concern that the policy assumes all development must consider provision of formal sports facilities (changing rooms, pavilions etc.) even where unsuitable due to location, context or topography (Planning Consultants, Developers).
- Request to avoid gender-specific language (“women and girls”) on grounds of perceived discrimination; preference for inclusive wording (Individual).
- Concern from Sport England that the policy doesn’t fully reflect NPPF para 103 requirements for assessing existing open space before loss or change, and risks failing to ensure replacement provision is of equal or better quantity/quality (Public Body – Sport England).

Calls For

- Delete OS01 or remove requirements for large-scale schemes and non-residential uses unless justified (Planning Consultants).
- Amend wording to recognise that formal sports provision should be considered on a case-by-case basis, not assumed for all sites (Planning Consultants, Developers).
- Replace gender-specific reference with “safe spaces for all users” (Individual).
- Include clear safeguards ensuring open space or playing fields are not lost without meeting NPPF tests (Public Body).

OS02: Sport, recreation and open space provision in association with development

Total responses: 11

Main Issues

- Objections that the policy is overly prescriptive, especially additional requirements for developments over 200 and 300 homes, which may be unjustified or unachievable (Planning Consultants, Developers).
- Concerns regarding how distance thresholds, typologies and standards interact with other policy requirements (e.g., SANGs, BNG, GI corridors), leading to potential duplication or double-counting (Planning Consultants, Developers).
- Calls for flexibility where topography or site constraints limit provision (Planning Consultants, Developers).
- Issue raised that OS02 uses a different occupancy rate to WS01, creating inconsistency (Planning Consultants).
- Support for the use of Natural England’s Green Infrastructure Framework and Access to Greenspace Standards (Otter Valley Association).
- Sport England encourage evidence-based provision using the Playing Pitch Strategy rather than standards alone (Public Body – Sport England).

Calls For

- Delete OS02 or delete the additional typology requirements for developments over 200 and 300 homes unless robustly justified (Planning Consultants).
- Allow greater flexibility in how standards are met, recognising physical constraints and multifunctional open space uses (Planning Consultants, Developers).
- Delete all text under “additional requirement for residential developments over 200 dwellings” (Planning Consultants).
- Ensure consistent occupancy rates across policies (Planning Consultants, Developers).
- Complete and rely on Playing Pitch Strategy and Built Sports Facility Strategy to inform evidence (Sport England).
- Retain NE’s Green Infrastructure Framework requirements (Otter Valley Association).

OS03: Location of facilities for sport and recreation and open space

Total responses: 0

- No responses were received for this policy.

OS04: New allotments and avoiding the loss of existing ones

Total responses: 0

- No responses were received for this policy.

OS05: Leisure and recreation developments in the countryside

Total responses: 1

Main Issues

- Policy supported; addition of “heritage” to matters for consideration welcomed (Public Body – Historic England).
- No objections to soundness from other respondents.

Calls For

- None (Historic England consider the amendment resolves previous concern).

15. Our Outstanding Historic Environment

Total responses: 21

HE01: Historic Environment

Total responses: 6

Main Issues

- Requests for stronger support, incentives and guidance for restoring historic areas and traditional features (Individual).
- Objection that parts of the policy do not align with NPPF Chapter 16 (Planning Consultants).
- Concern that identifying non-designated heritage assets through planning applications conflicts with PPG (Planning Consultants).
- Individual concern about balancing historic character with modern design (Individual).
- Support for clarifications on assessing significance (Public Body – Historic England).

Calls For

- Align HE01 with NPPF Chapter 16 or justify differences (Planning Consultants).

- Amend approach to non-designated assets to limit identification to exceptional cases (Planning Consultants).
- Provide stronger guidance/incentives for restoration (Individual).

HE02: Listed Buildings

Total responses: 3

Main Issues

- Policy wording seen as internally inconsistent: a “no harm” expectation conflicts with later harm-balancing tests (Planning Consultants).
- Objections that the policy should mirror the NPPF (Planning Consultants).
- Support for updates to Part B and para 15.12 (Public Body - Historic England).

Calls For

- Remove the opening “conserve/enhance” section to resolve inconsistency (Planning Consultants).
- Amend or justify wording that differs from NPPF (Planning Consultants).

HE03: Conservation Areas

Total responses: 2

Main Issues

- Requests for streamlined consent processes, specialist contractor directories and stronger support for traditional design (Individual).
- Objection that the policy is not aligned with NPPF (Planning Consultants).
- Support for revisions. (Public Body - Historic England).

Calls For

- Provide clearer processes and support for conservation-led restoration (Individual).
- Align policy with NPPF or justify differences (Planning Consultants).

HE04: Archaeology and Scheduled Monuments

Total responses: 4

Main Issues

- Opening sentence seen as requiring absolute protection, conflicting with later balancing tests (Planning Consultants).
- Repeated objection that policy departs from NPPF without justification (Planning Consultants).
- Support for removal of “exceptional cases” wording (Public Body - Historic England).

Calls For

- Delete the opening sentence to remove inconsistency (Planning Consultants).
- Amend to reflect NPPF terminology or justify departures (Planning Consultants).

HE05: Historic Landscapes, Parks and Gardens

Total responses: 3

Main Issues

- Support for updates addressing previous concerns (Public Body - Historic England).
- DCC request retention of text ensuring Registered Parks and Gardens are treated as designated assets (Devon County Council).

Calls For

- Retain removed paragraph on designated historic landscapes (Devon County Council).

16. Community Facilities

Total responses: 6

CF01: New or extended community facilities

Total responses: 0

- No responses were received for this policy.

CF02: Loss of community facilities

Total responses: 6

Main Issues

- Lack of definition for “community facilities” and unclear policy terminology (Planning Consultants).
- Concern that “community value” is subjective and undefined; risk of inconsistent interpretation (Developers).
- Requests for clearer tests/criteria when assessing loss or replacement of facilities (Planning Consultants).
- Concern that the Marketing Statement requirement (12-month marketing) is noted but detail may be insufficient or inflexible (Developers).
- General support for the policy (Public Body - Theatres Trust).

Calls For

- Define “community facilities” and reconsult on revised wording (Planning Consultants).

- Add an additional “test” or clearer criteria to assess replacement or loss (Planning Consultants).
- Clarify policy wording, particularly around “community value”, and consider alternative phrasing such as “like for like replacement in terms of size and facilities” (Developers).
- No changes requested by supportive respondent (Public Body - Theatres Trust).

17. Implementation and Monitoring

Total responses: 7

Main Issues

- Suggestion to reference the operational status of Marlcombe SANG due to its scale (Natural England).
- Support for strengthened monitoring of transport strategies, including governance arrangements for the Marlcombe Transport Vision (National Highways; Network Rail).
- Concern that monitoring resources are insufficient to check post-completion landscaping, ecological enhancements and timely delivery of promised infrastructure (Community Group Otter Valley Association).
- Monitoring Framework viewed as lacking clear targets, triggers for action, or explicit mechanisms to address housing under-delivery (HBF).
- Lack of an air quality mitigation strategy for East Devon Heaths SAC/SPA creates uncertainty and potential Duty to Cooperate issues (Individual).

Calls For

- Add reference to Marlcombe SANG in the chapter (Natural England).
- Maintain and develop robust transport monitoring and governance structures (National Highways; Network Rail).
- Increase resources for monitoring ecological enhancements and infrastructure delivery (Otter Valley Association).
- Provide a more detailed Monitoring Framework with clear housing targets, triggers and actions, including early release of reserve/windfall sites (HBF).
- Publish the Pebblebed Heaths air quality mitigation strategy and supporting HRA to inform monitoring and Duty to Cooperate requirements (Individual).

Sustainability Appraisal

Total responses: 147

Respondent	Main issue	Comment summary
McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd	Landscape impact	The housing requirement set by policy SP02 is proposed to be met by a number of sites within National Landscape, as such the accuracy of the overall “score” of minor negative landscape effect is questionable at best. A number of sites are described as requiring considerable landscape mitigation and high quality design as a result of the site’s sensitivity, but that major/significant negative effects remain likely, including: Budl_02 (35 homes), Kilm_9b (23 homes), Kilm_10 (5 homes), Newt_04 (20 homes), Newt_05 (20 homes) and Otto_01 (10 homes). As such, the delivery and capacity of these allocations (equating to 113 homes) is far from certain. Site allocations Exmo_17 (410 homes), Gitti_05 (310 homes), Honi_07 (30 homes), Honi_13 (10 homes), Musb_01a (15 homes), Dunk_05 (43 homes), Ebud_01 (15 homes) and Sidm_34 (43 homes) are all within NL. Of these, Exmo_17 (410 homes) is dependent on an agreed Masterplan to demonstrate how development will be undertaken to conserve and enhance the NL, and the remaining 466 homes will require further detailed assessment to “maximise opportunities to conserve and enhance the National Landscape”. Despite allocation, the deliverability and capacity of these sites is questionable at best in the absence of detailed assessment of landscape impacts.
Natural England	Impact of air quality upon the natural environment	Local Plans are likely to generate increased emissions of nitrogen oxides (NOx) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. This should be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the Natural England research report ‘ <i>The ecological effects of air pollution from road transport: an updated review</i> ’ (NECR199).
Boyer Planning on behalf of Taylor Wimpey UK Ltd	Land at Northcote Hill, Honiton (GH/ED/39a and GH/ED/39b)	Taylor Wimpey disagrees with the SA scoring against the SA objectives, in particular, the assessment of objectives 2,4,5,7,9 for GH/ED/39a and b. Taylor Wimpey has provided additional evidence, including technical reports as part of planning applications for the sites, against each of those objectives and rescored the site accordingly, which demonstrates that GH/ED/39b is capable of accommodating an increased quantum of development (at least 299 homes), and therefore the draft allocation should be increased within the Draft Local Plan.
Boyer Planning on behalf of	Land at St John’s,	3West Developments broadly agrees with most of the scoring against the SA objectives and considers that the appraisal

Respondent	Main issue	Comment summary
3West Developments	Exmouth (Exmo_20)	appropriately recognises the strategic merits of the St John’s allocation. A revised assessment includes minor points of clarification informed by technical surveys and assessments that demonstrate the site can accommodate around 700 dwellings whilst making a positive contribution towards the SA objectives.
Black Box Planning on behalf of Greendale Group (FWS Carter & Sons Ltd) and Crealy Farms	Marlcombe	It is recognised that proportionate SA work would have been undertaken at other earlier stages of Local Plan production. However, on the premise that the First Consultation complied with Regulation 19 by supposedly comprising a plan which the Council intended to submit to the Secretary of State and contained those supporting documents which are relevant, then the Greenhayes comment was evidently a strong criticism that the SA work on such a critical component of the Regulation 19 plan extended to only 15 pages.
Black Box Planning on behalf of Greendale Group (FWS Carter & Sons Ltd) and Crealy Farms	Marlcombe	<p>The Council should identify where the additional 2,000 dwellings and associated land uses may be located. The only logical expansion location for Marlcombe would be at Greenhayes. The Council are using the 80% threshold of the Transitional Arrangements as a target and a supply of deliverable homes, which would meet the stated objectives for strategic development generally and the New Town specifically, is being defied without any rationale.</p> <p>Option 2, and particularly the Greenhayes component of it, has suffered to an extent because of the finite way in which the options have been defined by the October 2022 CBRE report – with Option 1 being focused between the A30 and A3052 corridors, Option 2 being focused on only the A3052 corridor and Option 3 being focused between the A376 and A3052 corridors. For example, Option 1 and Option 2 overlap, so do not represent truly distinct alternatives to each other. Essentially, the Greenhayes promotion suffers by not being included within Option 1.</p> <p>Whilst the Greenhayes promotion is based on self-containment, it does not need to be in lieu of the Council’s objective of delivering a Second New Community. Greenhayes should instead be added to an expanded Marlcombe, given its location can deliver a number of wide ranging significant benefits, extending to early delivery of infrastructure in the form of a ‘ready made’ local centre, enabling of connections to Greendale Business Park, and delivery of the southern extent of the proposed Clyst Valley Regional Park extension.</p>
Black Box Planning on behalf of Greendale Group (FWS Carter &	Marlcombe	Strongly disagree that Option 2 has access to less employment opportunity than Options 1 and 3. The arbitrary 3km distance has clearly been used to create a distinction between the options when one does not exist. Option 2 is in equal proximity to Exeter as Option 1 and 3. Furthermore, Option 2 significantly benefits from

Respondent	Main issue	Comment summary
Sons Ltd) and Crealy Farms		having three major employment sites located within it – in the form of Greendale, Hill Barton and Crealy – enabling more localised commutes to be made by walking and cycling and increasing self-containment. The idea that Option 2 is markedly less attractive for future business occupants is strongly disputed, given the established Greendale Business Park and demand for commercial space on the A3052 corridor and with good access to the strategic road network.
Home Builders Federation	Housing requirement	Unclear if an SA was produced to support the first Reg 19 consultation and what if any changes have been made to it to support the second Reg 19 consultation. We would expect the SA to fully consider and test the implications of meeting the standard method housing figures in full, and the implications of opting for a higher housing figure to support growth, meet unmet need of neighbouring authorities and provide for a range and choice of sites.
LRM Planning on behalf of DWH	Housing requirement	Housing requirement Option A represents the requirement contained within the emerging Local Plan, whilst Option C represents the local housing need figure at the time the 1 st Regulation 19 Plan was published. The current and up-to-date local housing need figure (1,156 dwellings per annum) was dismissed as being a reasonable alternative, but the current local housing need figure is clearly a realistic option, particularly as national policy confirms the need to meet objectively assessed development needs, unless the application of the tests in para. 11 of the NPPF suggest that it is unachievable. Such evidence has not been provided, and it would have also provided a strong fit with Objective 3 of the emerging Local Plan. The lack of consideration of such an obvious reasonable alternative strengthens DWH view that the second consultation has been more focused on exploiting the opportunity provided by the transitional arrangements contained within the December 2024 version of the NPPF and less concerned about making a conscious effort to meet local housing needs.
LRM Planning on behalf of DWH	Housing requirement	The SA concludes that Option A is the preferred option but there are a number of technical deficiencies with this approach, namely: incorrect assumption that additional growth above Option A would be directed to a third new community, which ignores smaller sites such as land west of Lilypond Lane, Whimble; Options B and C would result in greater level of housing needs being met, but score the same as Option A in the SA; BNG and NPPF will protect biodiversity and the historic environment to the same extent across all Options; the lower score for Options B and C for SA Objectives 4, 10, 13 assumes that the additional growth will take place in a new town and that new town providing fewer services, but does not consider how the higher levels of development at Options B and C could be dispersed to existing settlements where services and

Respondent	Main issue	Comment summary
		<p>facilities exist; no evidence to justify major negative effect on land resources for Options B and C; the extra benefits from job creation from higher housing figure should mean major positive effect for Options B and C, but a minor negative effect for Option A. The SA does not conclude there is an over-riding infrastructure or environmental capacity constraint that would prevent the full housing need being accommodated.</p> <p>A re-assessment of the Options suggests that revised Option C is preferable.</p>
LRM Planning on behalf of DWH	Stepped trajectory	No SA has been undertaken of the application of the stepped trajectory within Strategic Policy SP02 or the level of the step – this issue has been identified by the Inspectors of the emerging Wiltshire Local Plan (letter dated 22.12.25)
LRM Planning on behalf of DWH	Spatial Strategy – Whimple	Support the spatial strategy in general terms, but Whimple should be given a greater role and be included in Tier 3 as it has a comparable level of services and facilities to Tier 3 settlements. This would lead to positive effects against a range of SA objectives, specifically objectives 2, 4, 5, 6, 8, 9, 10, 11 and 13.
LRM Planning on behalf of DWH	Land west of Lilypond Lane, Whimple	The Sustainability Appraisal does not consider the development potential of land to the west of Lilypond Lane, Whimple. It is assumed that this is because of the conclusions presented within the HELAA that the site is probably unachievable. For the reasons set out above, this is an incorrect conclusion. The reasonable alternative presented by the site has not therefore been considered, which means that the Plan is unjustified. Accordingly, the site should be subject of assessment in future versions of the Sustainability Appraisal.
LRM Planning on behalf of The Cherwell Group	Spatial Strategy	Agree with the SA of the proposed spatial strategy, including the preferred distribution of development, and the allocation of Marlcombe.
Carney Sweeney on behalf of Stuart Partners Ltd	Differences between the SA of the 1 st and 2 nd Reg. 19 Local Plan	The changes to the SA go beyond what could be described as minor, and include Strategic Policy AR02, significant additions to the Marlcombe SA including masterplan options, updates to baseline information and relevant plans, and archaeological evidence.
S Winn and others	Lack of transparency in the SA update	The revised Sustainability Appraisal is fundamentally different and retrospectively written based on consultation feedback regarding its shortcomings. It cannot be meaningfully reviewed because no Schedule of Changes or tracked changes version has been provided – this prevents stakeholders from making representations in accordance with consultation requirements.
S Winn and others	Land at St John's,	Exmo_20 should be shown as failed site sifting consistent with the HELAA findings of it being unsuitable and unachievable. No

Respondent	Main issue	Comment summary
	Exmouth (Exmo_20) failed site sifting	evidence has been provided to demonstrate that constraints relating to access, mineral safeguarding, or proximity to the Pebblebed Heaths can be resolved.
S Winn and others	Exmo_20 impact on Pebblebed Heaths	Page 390 incorrectly describes the 400m exclusion zones as relating to recreation impacts, whereas the zone is defined by urbanisation effects, demonstrating a misunderstanding of the Habitat Regulations. Exmo_20 is not assessed consistently with Exmo_04
S Winn and others	Exmo_20 incorrect size	Page 392 states Exmo_20 is 85 hectares, but this site is not available meaning the decision to allocate is unsound.
S Winn and others	Exmo_20 Pebblebed Heaths exclusion zone	The SA states that built development will not be permitted within the 400m buffer zone – the Local Plan must accord with this conclusion.
S Winn and others	Inconsistent approach to Exmo_20 and Exmo_04	Page 399 notes that mitigation within 400m of the Pebblebed Heaths is not possible for Exmo_04 or Exmo_20, resulting in the adjustment of Exmo_04 to Exmo_04a. No equivalent adjustment has been applied to Exmo_20 despite identical constraints.
A Humphrey and others	Inconsistent approach to Exmo_20 and other sites at NE Exmouth	The appraisal of Exmo_20 on page 391 does not mention “could lead to some of the greater adverse impacts” which is stated for other sites on the north eastern side of Exmouth (page 390), despite Exmo_20 being the largest site and closest to the Pebblebed Heaths.
A Humphrey and others	Exmo_20 Appropriate Assessment	Exmo_20 was selected for inclusion in the Local Plan prior to the Appropriate Assessment, in conflict with the ‘People over Wind’ CJEU ruling.
A Humphrey and others	Exmo_20 biodiversity impact	Exmo_20 is partly covered by the Strategic Nature Area and draft Nature Recovery Network and is a supporting habitat for S.41 Principle important species ground nesting Nightjar, so should be reassessed.
Not provided	Water Cycle Study	Paragraph 17. Words used are limited levels of pollution. South West Water are one of the worst performing water companies both for wet weather spills and dry weather spills. There are errors in the Water Cycle Study, so we need to delay the Local Plan, and to fully ascertain that any required water infrastructure requirements are scoped, funding identified, with key timelines that align with all developments agreed with SWW.
S Davies on behalf of	Risks to water environment,	The allocation of large amounts of development around the Exe Estuary (Lypmstone, Exmouth, and Woodbury) is not sustainable and does not comply with the Habitats Regulations designed to

Respondent	Main issue	Comment summary
Lympstone Water Quality Group	impacts of climate change	protect the Exe Estuary (a European wildlife site/SPA). The HRA is inaccurate as the Exe Estuary only considers recreation impact, not water quality. The SA is inaccurate and does not include up to date information on risks to the water environment, and the impact of climate change (beyond flood risk).

Report to: Strategic Planning Committee

Date of Meeting 5 May 2026

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Heritage Strategy 2024-2042

Report summary:

Following the successful completion of the Heritage Strategy Consultation (28 November 2025 – 26 January 2026), feedback received from organisations and individual respondents has been analysed, and updates to the strategy text have been implemented. The full list of amendments to the strategy and our response to feedback can be viewed in appendix A and the tracked changes version of the strategy in Appendix B. The feedback we received has resulted in a number of positive amendments to the strategy, such as the correction of minor factual or grammatical errors to updated case studies, economic and historic environment statistics, and further information on the historic environment, organisations, legislation and guidance.

The strategy brings together information on the heritage of East Devon and identifies the issues, challenges and opportunities for the future with a plan of recommended actions. It informs and supports the heritage policies of the new Local Plan.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee:

1. The Strategic Planning Committee agree to adopt the updated Second Heritage Strategy (2024-2042) in support of the council's duty towards the historic environment.
2. Note that the Heritage Strategy supports the Local Plan as evidence for policies.
3. Note that the Strategy should be taken into account as a guide for our Cultural, Tourism and Planning functions, amongst others.

Reason for recommendation:

The NPPF (para.203) states that "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats." The Local Plan outlines its policies for the district's heritage, whilst the Heritage Strategy sets out more detailed aims, objectives and a plan of recommended actions. With the strategy having been updated following the consultation that ran alongside the second reg. 19 consultation for the Local Plan, the strategy is ready for adoption to support the policies within the plan and the council's commitment to supporting the historic environment.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management, e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Communications and Democracy
- Economy
- Finance and Assets
- Strategic Planning
- Sustainable Homes and Communities
- Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk; Low

Links to background information Links to background documents are contained in the body of this report.

Link to [Council Plan](#)

Priorities (check which apply)

- A supported and engaged community
- Carbon neutrality and ecological recovery
- Resilient economy that supports local business
- Financially secure and improving quality of services

Report in full

1 Introduction

- 1.1 This report introduces the updated Heritage Strategy (2024-2042) for East Devon, and recommends that, having completed an 8-week public consultation between November 2025 and January 2026, the amendments set out in this report are approved and that the finalised Second Heritage Strategy is adopted.
- 1.2 The strategy, in full, that is recommended for adoption is appended to this committee report, alongside the full list of amendments and our response to feedback (appendix A).

2 What is Heritage and why is a strategy necessary?

- 2.1 The term heritage embraces history in all its forms, from buildings, spaces, art and artefacts to natural heritage such as landscape, flora and fauna and cultural heritage including place names, customs and traditions.

The Historic Environment is defined in the NPPF (2024) as “all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”

A Heritage Asset is defined in the NPPF (2024) as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”

- 2.2 The [National Planning Policy Framework](#) p.203 requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment. Historic England emphasised this requirement in its response to consultations on the Issues and Options and Draft versions of the emerging Local Plan. East Devon has a rich historic environment and an abundance of heritage assets that provide very significant environmental, social and economic benefits for the district. As an irreplaceable resource the strategy will help to ensure that they are protected, maintained and enhanced to the advantage of future generations.
- 2.3 The existing [Heritage Strategy](#) covers the period 2013-2031 and, as more than 5 years have passed since its adoption and many of the short term actions have been achieved, it is considered an appropriate time to refresh and update it so that it can support the policies in the new Local Plan.
- 2.4 The new strategy follows the same format as the original and presents a summary of the historic environment of the district, its significance and its benefits. It also identifies the heritage issues in East Devon and develops objectives for the future with an action plan for the delivery of our recommendations. In more detail:

Section 1:

Following an introduction, this sets out the purpose of the strategy, provides information on the role of the Council and other organisations, sources of information and a background of legislation and policy. It also discusses the implementation of the actions in the original strategy and highlights the very significant progress made on these.

Section 2:

The overall strategy for the future of our heritage is met through a range of aims and objectives. These are addressed in the three themes of:

A: Understanding and appreciating our historic environment

This section provides an overview of the historic environment, detailing significant designated heritage assets such as Conservation Areas, Listed Buildings, Parks and Gardens, Scheduled Monuments, and the World Heritage Site coastline and landscape. It also briefly covers undesignated assets, including archaeological findings.

B: Positively managing our historic environment

This theme sets out our current policies and programmes relating to development management, Conservation Areas and heritage assets at risk. It identifies issues and looks at the future programme of managing these designated assets and the potential for a local list of undesignated assets, whilst providing further guidance on local distinctiveness. A significant new section relates to carbon reduction and climate

change mitigation and how this can be achieved, particularly in listed buildings, without damaging their intrinsic character.

C: Enhancing and benefitting from our heritage

This theme looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon. It identifies how we can work better with partners and communities to enhance our heritage and make the most of these benefits, particularly in terms of working with Neighbourhood Planning groups and informing their policy production. It also considers the wider policy context.

Section 3:

Implementation of the strategy is considered including resources, benefits and monitoring. The objectives raised from each theme are developed into a plan of recommended actions, detailed initially for the next three years. Many of these actions follow on from the original strategy, and are maintenance tasks or updating of information.

Section 4:

Appendices include a summary description of the Conservation Areas of East Devon, information and maps for each of our historic town centres, details of partners and local history organisations. This has been updated to reflect the new Local Plan policies and latest guidance.

3 Resource Implications

- 3.1 The actions recommended in the strategy have been carefully considered in the light of resource implications. They are either a priority as they are needed to fulfil a statutory duty, or are expected to produce significant beneficial outcomes whilst minimising resources in the long term.
- 3.2 A significant number of short-term priorities identified in the original strategy have been wholly or partially achieved and many of the actions in this updated strategy involve further or ongoing work to build on these achievements whilst minimising the resources required.
- 3.3 For example, a more comprehensive website is required to provide a base for the exchange of information and links to other organisations, guides and training in heritage issues. The heritage webpages established under the previous strategy will now be maintained and updated rather than created anew, recognising that most Officer input has already been undertaken.
- 3.4 The original strategy required a considerable investment of staff time facilitating and advising on training. However, this has built capacity within local communities, utilising their enthusiasm and expertise to manage their own assets and take accountability of their area through neighbourhood plans. Further training is likely to be delivered via support for Neighbourhood Planning.

- 3.5 Support will be provided to Neighbourhood Planning groups who wish to protect heritage assets through designation and/or producing policies and continue to encourage resourceful ways for communities to help manage assets in their local areas. Along with specialist historic groups, volunteers will continue to be encouraged to identify non-designated heritage assets locally. A number of pilot schemes were implemented following the original strategy and these have informed the actions in the current strategy.
- 3.6 It should be noted that the devolution proposals are likely to have an impact on the availability of staff and other resources to implement the action plan. Details are not yet known, but this could offer the opportunity to work collaboratively with staff from other Devon authorities and could increase the scope of future projects. Recognising the uncertainties, and the potential need to review the strategy within a few years to ensure a consistent approach across authorities, the majority of short-term actions focus on existing processes and projects rather than committing to major new initiatives.

4 Public Consultation and Amendments

- 4.1 A public consultation to provide residents and organisations with a chance to voice their opinions and influence the final state of the strategy was conducted for 8 weeks between 28th November 2025 and the 26th January 2026. The consultation length was in conformity with the Statement of Community Involvement [SCI January 2021](#) that states consultation should be a minimum of 4 weeks, with additional time provided to account for the Christmas holiday.
- 4.2 13 responses were received from individual members of the public and organisations such as Historic England, the Devon County Council Historic Environment Team, Devon Wildlife Trust and Devon Archaeological Society. Full PDF representations can be found on the [Heritage Strategy Consultation website](#), with a list of the changes made to the strategy and officer response to any additional feedback available in Appendix A.
- 4.3 The feedback we received has resulted in a number of positive amendments to the strategy. Key changes to note include the correction of minor factual or grammatical errors, updated case studies such as ‘Discovering Dunkeswell Abbey’, updated economic and historic environment statistics, further information on the tangible and intangible cultural and heritage assets and organisations within East Devon, and additional details on recent national and local legislation and guidance. Amendments to the aims, objectives and actions for the strategy - including the addition of three new actions focused on biodiversity, ecology and the local list of heritage assets - have been included in the theme summaries and action plan where appropriate, with little impact on the overall predicted resource implications of the strategy.

5 Recommendations

- 5.1 The new Local Plan contains a number of heritage policies and proposed allocations with heritage implications. To comply with the NPPF and address the matters raised by Historic England and other representors during consultation on the Draft Plan, it is proposed that the existing Heritage Strategy be updated to cover the remainder of the new Plan period. The Strategy will form the basis of the evidence to support the heritage policies in the Local Plan and, through the action plan, demonstrate the Councils commitment to protecting and enhancing the historic environment.

5.2 It is recommended that the Heritage Strategy (2024-2042), with amendments made following the public consultation, is approved and adopted, to enhance the historic environment and support the Local Plan heritage policies.

Financial implications:

There are no direct financial implications identified within the report. (AB-21/04/2026)

Legal implications:

There are no direct legal implications identified within the report. (DH/002533-23/04/2026)

Appendix A –

Heritage Strategy (2024-42) Consultation: Response to Feedback

This document sets out the changes that have been made to the Heritage Strategy as a result of feedback gathered as part of the public consultation. The table below sets out the schedule of changes and the main reasons for the amendments (e.g. if text has been suggested for inclusion/deletion by a respondent). If any feedback has not been actioned, our response and justification can be found in the additional feedback table below the main table in this document.

All of the representations and feedback forms (redacted) received during the public consultation can be viewed in pdf format on the Heritage Strategy webpage: [Heritage Strategy 2024-2042 Public Consultation - East Devon](#)

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Para or Section of updated strategy	Changes	Revised text	Reason for changes
1.2	Text amendments and additions	The government’s NPPF defines the ‘historic environment’ for planning purposes. The term heritage embraces history in all its forms, from buildings, spaces, art, artefacts and archaeological sites to the historic landscape such as the natural landscape, farm steads and hedgerows, flora and fauna and cultural heritage including place names, customs and traditions. The strategy will touch on many of these aspects but will focus on the role of the Council and how we can better work with partners and communities in the future, especially in respect of our built heritage. A glossary of key terms can be found in appendix 3 at the end of this document.	Suggested additions by Historic England (HE) and the Devon Historic Environment Team (DCC HET) and Devon Archaeological Society (DAS) for clarity around the Historic landscape. Signpost readers to the glossary appendix.
1.5	New paragraph added	The National Landscapes are also valued for their cultural landscape value (ie. Historic Landscape, built heritage, archaeology) and the East Devon NL and the Blackdown Hills NL contain some of East Devon’s	Suggested text from DCC HET and DAS

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>most important and distinctive historic landscapes and heritage assets. Overlapping the Jurassic Coast WHS and the East Devon NL, the East Devon Heritage Coast is a non-statutory designation that EDDC is responsible for. It is recognised for its natural beauty, wildlife, and heritage and designated to improve accessibility to the visitors.</p>	
Footnotes 1, 2, 16 and 17	Text amendments	<p>¹ MHCLG (2024) National Planning Policy Framework, para 203 ² MHCLG (2024) National Planning Policy Framework, Annexe 2: Glossary ¹⁶ MHCLG (2024), National Planning Policy Framework, paragraph 203 ¹⁷ MHCLG (2014), National Planning Practice Guidance, Paragraph: 003 Reference ID: 18a-003-20190723, Revision date: 23 07 2019</p>	Response to H.E feedback - NPPF was incorrectly listed as being prepared by DLUHC instead of MHCLG.
1.21	New paragraph and footnote links (3-7) added	<p>This strategy acknowledges that Heritage work programmes exist within other relevant Council Strategies; for example, the East Devon Cultural Strategy and East Devon Tourism Strategy¹ and aims to work towards these shared goals. The Arts & Culture Network² and Tourism Network³ are key district-wide groups with relevant work (such as the Cultural Tourism Map with heritage partner profiles⁴) and synergies with the priorities of the Heritage Strategy, and the potential for collaboration with these groups will be explored.</p>	To acknowledge that the strategy sits within, and links up with, the work conducted by multiple teams within the council to positively impact the districts built and living heritage.
1.29, 1.30, 1.44, 1.46, 1.47, 1.48 – What has been achieved since the	Text additions and amendments	<ul style="list-style-type: none"> Action: Promote strategy and web pages; develop a publicity plan to include press and social media <p>Completed: A publicity plan was considered by the Heritage Working Group and implemented with a series of press releases. Articles appeared on Facebook and Twitter and through the press, including the Exmouth Journal, promoting the heritage strategy and its initiatives. Heritage assets have been promoted through the new Cultural Tourism Map, launched in 2024.</p>	To include additional work completed by the Culture and Economy teams within the council since the last heritage strategy was produced.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
last strategy.		<ul style="list-style-type: none"> • Action: Support events such as the annual Heritage Open Days and the East Devon AONB Heritage Conference. Promote heritage strategy and website at heritage events. Arts and Culture East Devon and East Devon Tourism Network promoted heritage events. • Action: Increase attendance at meetings or events with partner organisations to work towards common goals <p>The Conservation Officer attended partner meetings including those organised by the East Devon AONB, Devon County Council and Historic England. The Cultural Producer attended partner meetings including those organised by Museum Development South West and invited the National Lottery Heritage Fund to speak at an Arts and Culture East Devon Network meeting.</p> <p>1.46 Action: Work with others to identify projects and sources of funding</p> <p>Members of the Heritage Working Group have been productive in identifying new projects and funding including</p> <ul style="list-style-type: none"> • Heritage Action Zone and town centres funding: exchange of information • Energy efficiency grants and loans, working with the Empty Homes Officer • Energy efficiency in older buildings training • Through the UK Shared Prosperity Fund the Creative East Devon Fund, the Culture, Leisure and Tourism Fund, the Carbon Action Fund were also set up benefitting multiple local museums. 	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<ul style="list-style-type: none"> • Action: Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage. • Information on training opportunities from various sources have been gathered which communities can use. Links are provided on the East Devon Heritage and Local Assets webpage. • Arts and Culture East Devon have delivered a curated programme of free training attended by East Devon Museums. Topics have included: Fundraising, Marketing, Volunteer Recruitment and Retention, Carbon Literacy, Collections Care and Management, Governance, Accreditation, Care of Photography, Digital Accessibility and Natural History Collections Display. <p>1.48 Action: Produce a template to guide neighbourhood planning groups in site assessments to ensure that heritage matters are appropriately considered A template has been produced.</p>	
1.54 (Key orgs and sources of information) and 1.80 (Legislative Framework)	New paragraphs added	<p>1.54 Under the Levelling-Up and Regeneration Act (LURA) 2023, the council must have ‘special regard’ to the desirability of preserving or enhancing heritage assets and their setting. This includes preserving or enhancing any feature, quality or characteristic of the asset or its setting that contributes to its significance. ‘Relevant assets’ as described by the LURA include Ancient Monuments, Historic Parks and Gardens, Protected Wreck Sites and World Heritage Sites.</p> <p>1.80 The Levelling Up and Regeneration Act (LURA) 2023 proposed a number of changes and new provisions relating to the historic environment and the council’s duties with regards to heritage, some of which have not yet been fully implemented. Following the implementation of the act, the council must now have ‘special regard’ to the desirability of preserving or enhancing relevant</p>	As recommended by H.E, DCC HET and DAS. To reference and explain the council’s duties under the Levelling Up and Regeneration Act 2023 (LURA 2023).

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>assets and their settings, such as Scheduled Monuments, Registered Parks and Gardens, Protected Wreck Sites and World Heritage Sites, alongside the statutory duty already in place for listed buildings and conservation areas. Other provisions introduced by LURA include the removal of compensation rights and mandatory consultation with Historic England for Building Preservation Notices (BPNs) used to assess buildings for listing, empowering the council to issue temporary stop notices for works being undertaken on a listed building without an LBC or without complying with the conditions of an LBC, and the potential for urgent works to be undertaken to all parts of a listed building if necessary. Finally, the act has raised the statutory status of Historic Environment Records (HERs) with relevant authorities' duty to maintain these lists, as Devon County Council does on behalf of the Devon Districts including East Devon.</p>	
1.56 – 1.59	Text amendments and new paragraphs	<p>Historic England is the public body that helps people care for, enjoy and celebrate England's spectacular environment, see: https://historicengland.org.uk/about/what-we-do/</p> <p>The role of Historic England includes advising government on the designation of Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Battlefields and Protected Wreck Sites identified by them or put forward by individual request, and managing the list of designated assets, as well as advising the government on matters of World Heritage. They primarily provide advice on Grade I and Grade II* heritage assets and deal with Scheduled Monument consents. Information is available on designated assets in East Devon including those categorized as 'at risk'.</p>	In line with suggestions by H.E to better explain the role of HE in the planning process and beyond.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Historic England has a formal role in the planning process, including being a consultee on Local Plans and on certain applications for planning permission and listed building consent</p> <p>The organisation also carries out extensive research and monitoring of heritage assets and their value, and provides information on funding, with a comprehensive range of guides through their website. 'Heritage Counts' is an annual audit of England's Heritage, monitoring 'heritage indicators' for each region with information collected by the Historic Environment Forum and reported on by Historic England.</p>	
1.62 – 1.66	Text amendments/additions	<p>The County Council maintains the Devon Historic Environment Record (HER) as a public record and on behalf of Devon's local planning authorities. The HER contains information about designated, locally listed and other undesignated heritage assets, including archaeological sites, historic buildings, landscapes and findspots, from the Palaeolithic (Old Stone Age) to the mid-20th Century.</p> <p>The HER holds source material such as historic tithe and Ordnance Survey maps, RAF aerial photos from the 1940's, other archaeological aerial and ground photographs, published and unpublished material, available to view in person or online.</p> <p>The HER contains links to reports and studies, such as Historic Landscape Character Mapping, revealing the evolution of East Devon's field patterns through the ages. Also, the Devon Historic Market & Coastal Towns Survey, which includes Exmouth, Honiton and Seaton.</p> <p>The HER contains the results of systematic archaeological analysis and interpretation of aerial surveys, including conventional aerial photography from the 1930s to the present day, and recent remote sensed data</p>	Suggested text provided by DCC HET.

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		<p>(LiDAR – Light Detection and Range) revealing a wealth of evidence on the history of East Devon. These Aerial Investigation & Mapping Projects, funded by Historic England, have covered the South Devon Coast (including East Devon), the Blackdown Hills, and East and Mid Devon River Catchments.</p> <p>Information held in the HER underpins the County Historic Environment Teams role in advising East Devon District Council on spatial planning and development management casework, and the County Council as the minerals and waste planning authority and highway authority. Also advising statutory undertakers for pipeline and cabling operations (such as water, gas and electricity companies), and conservation bodies, farmers and land managers for national and local environmental stewardship schemes, tree-planting, and biodiversity habitat enhancement initiatives.</p> <p>=</p>	
1.67	New Paragraph	<p>Devon County Council As the Highways Authority, Devon County Council is responsible for maintaining heritage assets such as historic bridges, milestones, traditional waymarkers, and its role in managing the public realm in East Devon’s historic towns/villages</p>	Suggested text provided by DCC HET.
1.72	Text amendments	<p>The Jurassic Coast World Heritage Site The Jurassic Coast Trust closed in January 2025. Responsibility for the World Heritage Site now sits with Dorset Council and Devon County Council with East Devon District Council staff participating in site governance.</p> <p>.</p>	The Jurassic Coast WHS Trust ceased operations in January 2025, this paragraph has been rewritten to address the responsibility of Dorset Council, DCC and EDDC for the WHS. Feedback from multiple respondents.

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1.73	Text addition	There are many local historic societies and associations, heritage centres and museums providing more detailed information on the historic environment in their area, which are listed in Appendix 3. Information may also be available in libraries and online, with publications and guides by societies such as the Proceedings of the Devon Archaeological Society.	Recommendation from DAS.
1.74	New paragraph added	<p>Museum Development South West</p> <p>MDSW exists to support museums and heritage organisations to develop and improve across all areas of their operation. They provide trusted, local and relevant development services to support museum and heritage organisations to improve, innovate, collaborate and celebrate. The Museum Development Officer for Devon works closely with the Arts and Culture East Devon Network, creating opportunities which build confidence and skills, encourage innovation, and celebrate our heritage and Culture.</p>	Recommendation from internal feedback (Culture & Economy teams).
1.76	Text additions	As it is periodically updated, it is important to note that when drawing up proposals, reference should be made to the most recent version of the NPPF.	Recommendation by H.E to ensure the most recent NPPF is referred to in planning proposals.
1.82	Text amendments	The emerging Plan will contain a suite of policies of particular relevance to the historic environment. These will be strategic policies and will include an overarching policy and then specific policies relating to listed buildings, conservation areas, Archaeology and Scheduled Monuments and historic landscapes, parks and gardens. The full Local Plan is available to view on the Council's website.	Missed capitalisation of 'Scheduled Monument' as highlighted by DCC HET/DAS
2.3 – 2.12	Text additions	Our district has a unique historic environment and range of heritage assets, which can be understood better by looking at what has gone	Recommendation from DCC HET and DAS for further information on East Devons rich history

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>before. Throughout the district there is much evidence of human occupation from the past in the present, from significant finds of Stone Age hand axes, particularly at Broom Quarry, and concentrations of Bronze Age Barrows at Farway and Brampford Speke, prominent Iron Age hill forts on the Greensand Ridges, spurs and outliers of the Blackdowns and coastal and inland promontory forts such as Berry Camp, to Saxon settlements and Roman roads, from medieval places of worship to Georgian, Victorian and Edwardian residences, from factories of the industrial revolution to World War II airfields, to name just a few.</p> <p>In rural areas the history of both farming and extractive industries are evident in the vast number of marl pits used for improving soil, clay pits used for pottery industries, and in the distinctive medieval strip fields which may be glimpsed in places, beyond the high ‘Devon’ banks and hedgerows defining many of our country lanes. The post-industrial landscape of the district includes deliberate planting of trees within former mineral extraction pits (marl, clay, sand/gravel) across the Blackdown and East Devon National Landscapes, that has created a now highly characteristic pattern of dispersed woodland.</p> <p>The district contains much evidence of the Roman conquest in its army camps and forts, and later some villas or highly Romanised farmsteads and enclosed settlements. Parts of the Imperial road system still survive, including what was the Dorchester to Exeter Road and ‘Fosse Way.’ Alongside this, evidence of extensive opencast iron mining and iron smelting can be found around the Blackdown hills, with a probable iron</p>	<p>(particularly Roman and medieval) and important heritage assets and landscape features.</p>

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		<p>industry link to the Seaton Down Hoard, one of the largest Roman coin hoards ever found in the UK.</p> <p>East Devon has a rich heritage of urban centres, varying greatly in nature and character. Ottery St Mary's Saxon origins can be seen in the characteristic 'star' shaped pattern of its central routes, whilst this and the market towns of Honiton and Axminster were centres of the textile industry from medieval times. Honiton is a classic example of a planned town by the local lord, whilst Axminster originated as a Roman fort and small roadside town, with a Saxon royal and ecclesiastical centre at the heart of the modern town. Many of these urban centres, with the valuable historic built and archaeological asserts they may contain, are protected by the 34 conservation areas across the district.</p> <p>Farmstead groupings are also an important local feature, especially those of medieval origin or planned as a part of land estates, including those seen at Broadclyst, Gittisham and Broadhembury, and the Rolle Estate in the Otter Valley, whilst some fine manor houses and ecclesiastical residences remain, such as the Bishop's Court at Clyst St Mary.</p> <p>The quarrying of stone, such as that at Beer, and pottery making were other important industries at this time and local building materials and traditions including cob and thatch all contribute to distinctive local styles.</p>	

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		<p>Many of East Devon’s villages predate the 10th and 11th centuries, often centred around a parish church. As Christianity has been the main religion for more than 1500 years, churches form some of the most visible parts of our heritage, and the remains of an Abbey have survived at both Dunkeswell and at Axminster (Newenham Abbey). Historic non-conformist architecture can also be found across East Devon, including Methodist and Baptist chapels (e.g the Grad II* Loughwood Chapel) Reading Rooms, Sunday Schools and Quaker meetings houses.</p> <p>East Devon is also rich in toll houses and coaching inns, roadside features such as water pumps and troughs, Milestones, traditional finger posts/way markers, and in assets linked to water power, such as mills, factories and hydraulic rams.</p> <p>The Regency town of Sidmouth and other seaside resorts at Exmouth, Budleigh Salterton and Seaton all tell a story of their history through time, expanding with the development of railways. Good examples of the ‘Cottage Orne’ picturesque rustic buildings and later, fine Victorian terraces, Edwardian architecture and the Arts and Crafts style all contribute to distinctive town landscapes.</p> <p>Meanwhile, villages along the coast retain a local character that has been largely unspoilt by the expansion of tourism. The Second World War has also left many traces including pill boxes, radar stations and airfields telling the story of key events linked to the area, such as the Battle of</p>	

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		Britain (RAF Exeter), Battle of the Atlantic (Dunkeswell) and D-Day (RAF Upottery, Dunkeswell and training structures in the Pebblebed Heaths).	
2.16	Text amendments	Designation of an asset recognises the value(s) of its significance and gives it protection by law or policy for its management and enjoyment, now and in the future. The setting of an asset, although not designated in its own right, is also afforded protection when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection.	Suggested text provided by H.E.
2.17	Text amendments	Designated heritage assets may be Listed Buildings, Scheduled Monuments, World Heritage Sites, Conservation Areas, Registered Parks and Gardens, Battlefields or Protected Wreck Sites.	Recommendation by H.E to include WHS on the list of designed heritage assets
2.18	Text amendments	The most important heritage assets are formally recognised at a national or international level for their importance. In 2024, East Devon had 3,088 Listed Buildings, comprising nearly 4,500 individual buildings and structures (an asset may contain more than one individual building or structure), 8 designated parks and gardens and 112 scheduled monuments that are formally listed by Historic England.	Recommendation by H.E.
2.19 and footnote 24	Text additions	The number of listed buildings changes over time and up to date information can be viewed through the Historic England website. The District also has a World Heritage Site inscribed by UNESCO under criterion viii (Natural) ²⁴ , and 34 Conservation Areas that have been designated by East Devon District Council.	Suggested text provided by H.E.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>²⁴ Criterion viii(Natural) - 'to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features'</p>	
2.28	New paragraph	<p>It is important to note that Conservation Areas may also contain high archaeological potential, as the historic cores of many settlements could have origins stretching back to at least the medieval period.</p>	Recommendation by DCC HET and DAS
2.30, 2.31, inclusion of Colyton in Appendix 1 and reordering of Appendix 2.	Reclassification of Colyton as a Town rather than 'large village', alteration of conservation area statistics and addition of Colyton town centre profile	<p>2.30 Of the larger villages: there are eight Conservation Areas within the villages of Beer, Broadclyst,, East Budleigh, Lypmstone, Otterton, Sidbury, Whimble and Woodbury and are often located around the centre of the village. Three are entirely within a National Landscape (see appendix 2) whilst Broadclyst Conservation Area is partly within and surrounded by National Trust property.</p> <p>Towns There is a concentration of five Conservation Areas in Sidmouth including the town centre, Elysian Fields, Bickwell Valley, Sid Vale and Sidford, and three in Exmouth at Albion Street, Bicton Street and Louisa Terrace. There also is one Conservation Area in each of the towns of Axminster, Budleigh Salterton, Colyton, Honiton, Seaton and Ottery St Mary.</p> <p>2.31 Six of the Conservation Areas, in Axminster, Budleigh Salterton, Colyton, Honiton, Ottery St Mary and Sidmouth incorporate the historic town centre. These are described in more detail in Appendix 1.</p>	Recommendation by Joseph Watson. Previous listing as a 'large village' was in-line with hierarchy of settlements rather than historic status of Colyton as a town.

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		<p>Appendix 1</p> <p>Colyton Also known as “the most rebellious town in Devon” due to its links with the Monmouth Rebellions of 1685, Colyton is a small market town with Saxon origins and a history dating back to the 8th Century. Being a local centre, the town features a range of facilities including pubs, shops, cafes and a library, many within the town centre area that is located completely within the conservation area.</p> <p>The town has a range of richly detailed historic buildings, including the medieval church with lantern tower and a number of good 16th and 17th century houses, and a tightly knit built form with local and vernacular materials that has been largely undisturbed by 20th century developments.</p> <p>The local plan has is supportive of some development at Colyton that meets the neds of the immediate surroundings, whilst conserving and enhancing the quality of the historic built form. The nearby Beer Quarry Cave SAC will be protected, along with bat pinch points and semi-natural landscape between Colyford and Colyton</p>	
2.36	Text addition	The Devon Gardens Trust hold research and information on all of Devons Parks and Gardens and maintain a local list. Through the National Historic Gardens Trust, they are a statutory consultee on planning proposals affecting all registered Parks and Gardens.	Recommendation by DCC HET and DAS.

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2.38 and 2.39	Text amendments and new paragraph	<p>Archaeological heritage can take many forms, including earthworks, ruined buildings and structures, artefact scatters, individual findspots, below ground archaeological features and deposits (sometimes manifesting as archaeological cropmarks), as well as ancient field patterns and ancient environmental evidence preserved in waterlogged conditions. This heritage ranges from the Palaeolithic (Old Stone Age) to the Cold War of the 20th Century including the early prehistoric feature, significant Romano-British, medieval and post-medieval heritage, as well as modern industrial and military archaeology. This heritage is found across East Devon's towns and villages, as well as in the countryside and on the coast.</p> <p>Human activity in the district became frequent from 250,000 BCE and has left its mark with, for example, hand axes and other tools from the Lower Palaeolithic (Old Stone Age) found in the Axminster area.</p>	Recommendation by DCC HET and DAS.
2.42	Formatting issue	The most important archaeological remains are formally designated as Scheduled Monuments. Historic England carries out a programme of scheduling these nationally important archaeological sites, but anyone can make a nomination to Historic England.	To ensure consistency throughout.
2.43, 2.44, 2.46, 2.47, 2.48	Text amendments and additions	In 2024, East Devon had 112 Scheduled Monuments, notably its prehistoric Bronze Age bowl barrows and Iron Age hill forts. It has a diverse range including many Hillforts or prehistoric enclosures (many with 'castle' or 'fort' in their names) 1 Motte and Bailey castle, 1 Roman	Recommendation by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>fort , at least 2 Roman Villas, 2 abbeys, 6 bridges, 8 crosses, a holy well, a prehistoric field system, a manorial settlement, and an 'Ice House'.</p> <p>However, more than 60 of the district's Scheduled Monuments are 'barrows', which are particularly abundant around Farway Hill, Gittisham, Woodbury Common and in the Rewe, Upton Pyne and Bramford Speke area. Barrows are a type of burial mound where earth, and / or stone is used to cover a tomb and 'bowl barrows' are named due to their appearance of an upturned bowl. They were created during the late Neolithic period to middle Bronze Age (roughly 2500-1500 BCE) and provide important information on beliefs and customs as they served a ceremonial or ritual purpose. Barrows are often isolated but many occur in groups and are described as barrow cemeteries, three of which are in East Devon.</p> <p>Roman villas: Evidence of Romanised buildings or 'villas' at Membury and Holcombe, a possible Roman post station or 'Mansio' at Seaton, and the Roman Fort at Axminster with a Romano-British roadside settlement indicate that people eventually accommodated to Roman rule in this area. There has also been evidence of Roman military inside the Scheduled hillfort at Hembury.</p> <p>Castles: Many structures across the district called 'castles' are actually prehistoric Hillforts. Locally there is one genuine medieval motte and bailey castle at Castle Hill in Kilmington, and a moated (ditched defences) manor site at Cowley.</p>	

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		<p>Concentrations of Scheduled Monuments can be found in many locations (see map 1) near Brampford Speke, , Farway Common, Woodbury Common, and monuments from multiple periods at Killerton Park (from the Iron Age to the 18th Century). .</p>	
2.50	Text additions	<p>The Dorset and East Devon Coast World Heritage Site (also known as the ‘Jurassic Coast’) was the first natural environment designated World Heritage Site in England, and is one of only 17 in England and 31 in the UK. Its 95 mile coastline extends from the River Exe in East Devon to Studland Bay in Dorset. Most of the East Devon part also falls within the East Devon National Landscape. The coast’s exposed sedimentary rocks give a unique insight into 185 million years from the Triassic, Jurassic and Cretaceous periods. The town of Seaton has the unique position of being the only place on the Jurassic Coast where you can view rocks from all three geological periods in their natural environment, with fossil rich rocks to the east, vibrant red Triassic cliffs near the harbour, and white cretaceous chalk at Beer. Further, there are heritage assets present as a consequence of the geology and a result of human interaction with it, for example Exeter Cathedral’s quarries at Dunscombe and Beer, with Beer stone first being exploited in the Roman period for works such as the decorative stonework at Holcombe Roman villa.</p>	<p>Recommendations by Seaton Town Council to celebrate Seaton’s unique position along the Jurassic Coast.</p> <p>Recommendation by DCC HET and DAS to cover East Devons Roman history and use of materials.</p>
Living and Literary Heritage (2.51-2.53)	New Paragraphs	<p>Although not directly relevant to East Devon’s physical heritage, two additional UNESCO designations are important to note, these include the UNESCO City of Literature and the 2003 UNESCO Convention of Intangible Cultural Heritage.</p>	<p>Incorporates recommendations around UNESCO cultural designations, intangible heritage, literature, and heritage crafts and skills provided by Simon Timms and Joseph Watson.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>The City of Exeter was designated a City of Literature in 2019, recognising the significance of the literary heritage in the city and across the county. East Devon has associations with many celebrated literary figures, such as Dame Hillary Mantel and Coleridge, as can be seen in Literary Map of Devon.³¹</p> <p>Living Heritage (also known as Intangible Cultural Heritage (ICH)) is practised and living traditions, knowledge and skills, that can range from boatbuilding to singing, carnivals, dancing and dry-stone walling. As part of the UK’s commitment to the 2003 UNESCO Convention for the Safeguarding of Intangible Cultural Heritage, an inventory of living heritage from across the UK is being set up, with submissions being accepted online³² by organisation and individuals. East Devon has a rich history of cultural heritage, from the Ottery Tar Barrels and Sidmouth Folk Festival to crafts such as Oak Bark Tanning in Colyton, to Lace making and the Hot Pennies ceremony in Honiton. Future community engagement could investigate gaining recognition and inclusion on the list for the living heritage of East Devon.</p> <p>³¹ Literary Map of Devon (Exeter UNESCO City of Literature): 2025+literary+map+web.pdf ³² Welcome Inventories of Living Heritage in the UK</p>	
2.56 and 2.57	Text amendments	In addition to the eight parks and gardens included in the Historic England Register, thirty-one sites are included in the Devon Gardens Trust Local List of Parks and Gardens as important designed landscapes in the local context of Devon. Records are maintained by	Suggested amendments and additions by DCC HET and DAS

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Devon County Council’s Historic Environment Team. East Devon does not currently have any Registered Historic Battlefields, although the sites of the Western Rising (or Prayerbook Rebellion) of 1549 at Fenny Meadow, Woodbury and Clyst St Mary relate to events of national importance and so arguably merit consideration.</p> <p>In Theme B the strategy sets out proposals, working with local communities, for the means of establishing and managing a local list of undesignated assets.</p>	
2.61, 2.62 and 2.63	Text additions	<p>This area lies totally within East Devon and mainly in the southern third of the district (see map 1). It was designated in 1963, originating from the East Devon Heritage Coast (non-statutory designation) that can still be found in the south, and covers 103 square miles (32%). The south includes part of the dramatic ‘Jurassic Coast’ World Heritage site. Inland, large expanses of heathland provide a contrast to woodlands and river valleys in the predominately pastoral landscape. The East Devon Pebble Beds at Woodbury and other commons form the largest single block of lowland heathland west of the New Forest. Steep sided Devon hedge-banks border fields and narrow country lanes, leading to the many villages and hamlets, with many houses and cottages built of local stone, pebbles, thatch and cob. The EDNL has a rich prehistoric archaeological heritage, with the heathland containing numerous funerary and ceremonial monuments.</p> <p>Blackdown Hills National Landscape</p>	Recommendation by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>This area includes land in both Devon and Somerset and covers mainly the north eastern third of East Devon (see map 1). Designated in 1991, the National Landscape is a relatively unspoilt, diverse rural landscape. Stretching from a prominent steep scarp in the north, the area dips gently southward as a flat-topped plateau to Honiton in the South, dissected by spring-lined valleys. Prominent Iron Age hillforts can be found across the National Landscape, including Hembury and Dumpdon. The traditional pattern of villages and hamlets along the valleys remain largely unchanged among some medieval patterns of small enclosed fields and narrow lanes with high hedge banks. Villages, hamlets, individual buildings and their settings form a vital element of the character of the Blackdown Hills, particularly because of the widespread use of chert, a local stone, and the area's well preserved, distinctive architecture. The areas mining and quarrying heritage (iron, whetstones, clay and agricultural marl) has also left a significant legacy, with deliberate planting and natural regeneration of woodland over former extraction sites visible today.</p> <p>Natural Landscapes and Green Infrastructure</p> <p>There are many environments in East Devon that are also protected on account of their biodiversity or geological interest. Whilst typically, heritage considerations or assets would not form part of the reason for their designation, it may be that human management and activity has 'created' the biodiversity or geological interest. There can therefore be heritage interests that overlap the more formal biodiversity or geological interests of their designation. Heritage assets can often form a key part of</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		Green Infrastructure provision, such as green lanes, disused railway lines, field patterns/systems, parks and gardens, churchyards and cemeteries, orchards, and former quarries.	
2.64	Text amendments	<u>Special areas of conservation:</u> These are highly protected sites designated under the EU Habitats Directive to conserve important natural habitats and species other than birds.	Suggested text provided by Devon Wildlife Trust (DWT)
Theme A Objective 3 and Action Plan	Text additions to action	<i>Support and develop a calendar of local heritage events and anniversaries across the district, promote the strategy and website at events</i>	Further development of Action 2 following a recommendation by Joseph Watson.
Theme A Objective 4 and Action Plan	Additional Objective with Actions	<p>4 To integrate environmental and heritage enhancement. Actions:</p> <ul style="list-style-type: none"> <i>Promote the inclusion of biodiversity considerations, nature recovery and ecological enhancement in heritage management</i> <i>Conserve, enhance and integrate biodiversity and ecological networks within heritage assets and their settings where appropriate, through informed management and guidance.</i> 	Recommendation by DWT for consideration and integration of biodiversity and nature recovery within heritage protection and conservation actions.
2.72	Text additions	The Council places considerable weight on the importance of protecting the built heritage of East Devon, but it does so with limited resources. As a consequence, the emphasis in Council work has been to undertake regulatory tasks that it is required by law to do (specifically determining planning applications and listed building consent applications), rather than the more proactive aspects of conservation. The council conducts	Recommendation by DCC HET.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		this work, in partnership with Devon County Council regarding access to the Historic Environment Record, and for the provision of archaeological planning advice.	
2.83	Text additions	In addition to this, the Local Plan allocates development sites. Site assessments are undertaken as part of the allocation process to ensure that, in principle, development will not harm important interests including by negatively impacting upon heritage assets or their setting. In some cases development may actually enable better revealing of an asset or better understanding or access to it, particularly if archaeological assessment is required prior to development taking place. Where sites are allocated, development will still need to accord with the policies of the Local Plan and will still require planning permission. In line with national policy ¹ , further archaeological and/or historic building recording, in mitigation for the development's impact, may be required through planning conditions applied to any consent granted. These conditions can lead to additional public and conservation benefits, with evidence and any archives being made publicly accessible, potentially through web-based educational outputs, information panels and excavation open days.	Recommendation by DCC HET.
2.85	Text amendments	. Under section 8 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ² , Listed Building Consent is required for works to demolish, alter or extend a listed building in a way that would affect its	Suggested text provided by H.E.

¹ MHCLG (Dec 2024) National Planning Policy Framework Paragraph 218

² [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>character or appearance as a building of special architectural or historic interest. Alterations must be carried out with the greatest skill and care to ensure that changes are not detrimental to the special architectural and historic interest of the building.</p>	
2.88	New paragraph	<p>As with all planning applications, applicants for Listed Building Consent will need to submit sufficient information for a decision to be made. This may include an assessment of the history and historic fabric of the Listed building or structure and details of the proposed works. Conditions may be applied regarding the recording of any archaeological and historic building interest. Historic England, and other potential organisations such as amenity societies (e.g. Victorian Society, Georgian Group, Twentieth Century Society etc.) as statutory consultees may provide comments depending on the nature of the heritage asset.</p>	Suggested text provided by DCC HET and DAS.
2.94	Text additions	<p>Archaeological heritage is often vulnerable and easily damaged. Development won't be permitted if it would harm nationally designated sites, and that which would harm locally important sites or their settings will only be permitted if the need for development outweighs the damage to the archaeological interest of the site and its setting. Preservation in situ is considered to be the most appropriate means to ensure protection.</p>	Suggested text provided by DCC HET and DAS.
2.95	Text amendments	<p>Any work to a designated monument requires Scheduled Monument Consent, for which applications are made to the Secretary of State for Culture, Media and Sport, with the consulting process administered by Historic England. Preservation in situ is considered to be the most appropriate means to ensure protection.</p>	Suggested text provided by H.E.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.96	Text additions	For any proposed development, the impact on the special character of a registered park or garden must be considered and is a material consideration in the planning process. The setting of a Registered Park and Garden is also a key consideration, with designed landscape views of particular importance. The Gardens Trust is the statutory consultee for works affecting all Registered parks and gardens, whilst Historic England will be consulted for all that are Grade I and II* listed.	Recommendation by DCC HET and DAS.
2.98	Text amendments	A feature of local interest can take the form of a building that that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value. This also applies to parks and gardens of high local importance, and to significant archaeological sites, such as flint scatters, historic field systems and settlement sites that may be visible above ground, or may only survive below ground, such as sites recorded as archaeological cropmarks.	Suggested text provided by DCC HET.
2.101 and 2.102	New paragraphs	It is important to note that the local list is not an exhaustive list of all undesignated heritage assets. Many more assets, such as those found on the Historic Environment Record (HER), are also protected by national planning policy and Local Plan policies. The Local List is a dynamic subset that have been identified as being of particular importance to the community and will likely grow as awareness of the list grows and individuals, groups and organisations submit additional assets.	Suggested text provided by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>The HER was created by the Devon Archaeological Society (DAS) in 1975 to identify sites of all levels of importance, to guide planning, land management and research. It was passed to the County in 1979. Sites on the HER may be of lesser, equal, or greater significance than sites that are on the Local List.</p>	
2.103	Text amendment	<p>Designated heritage assets may be classified as 'at risk' due to negative changes through neglect, inappropriate development, agricultural and forestry activity, crime or damage and can reflect or impact on an area's social and economic decline.</p>	Recommendation by DCC HET.
2.104, 2.105, Table 3 and 4	Text amendments (updated using most recent Historic England data)	<p>Whilst most designated heritage assets of East Devon are in good or reasonable condition, a small proportion are classed as 'at risk.' There were no Conservation Areas at risk asof January 2026, in comparison with 6% across England in 2017.</p> <p>From the Historic England Heritage at Risk register 2025, which includes Grade I, Grade II*, Grade II Places of Worship and Scheduled Monuments there are 25 listed items defined as being at risk, an improvement on the 46 recorded in 2018 and considerably better than the national picture:</p>	H.E. provided a link to the most recent Heritage at Risk register data (2025).

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>45 are Grade I: 2 Listed Buildings, 13 listed Places of Worship and 1 Registered Park</p> <p>2 are Grade II*: 1 Listed Building and 1 listed Place of Worship</p> <p>1 is Grade II: 1 Place of Worship</p> <p>18 are Scheduled Monuments</p> <p><i>Table 3: East Devon Heritage Assets at Risk Grading, 2023-2025 (Historic England Website⁴¹, March 2024/January 2026)</i></p> <p>2 are category A: Immediate risk of further rapid deterioration or loss of fabric; no solution agreed: Church of St Lawrence (Grade I) and Poltimore House (Grade II*); the former is owned by a religious organisation, the latter is not in use and is owned by a heritage charity.</p> <p>4 are category C: Slow decay; no solution agreed: 2 are the Tithe barn and stable at Bishop's Court, Clyst St Mary (Grade I) and privately owned, the other 2 are Grade II* and Grade II churches</p> <p>1 is category D: Slow decay; solution agreed but not yet implemented: This is a Grade II* church</p> <p>The remaining 10 assets at risk do not have a priority grading</p> <p>Of the 25 assets at risk, 2 are noted as improving in condition, with 4 recorded as stable. Overall the situation has improved but a number of scheduled ancient monuments remain at risk of deterioration due to factors outside the planning system, such as coastal erosion and faring practices, with barrows being at particular risk from agricultural intensification and plant growth. Historic England do not monitor Grande II listed buildings at risk unless they are ecclesiastical buildings.</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.109	Text amendments (and removal of most of the previously numbered 2.100 paragraph)	<p>.</p> <p>Historic England does not monitor Grade II listed buildings, unless they are places of worship., however, a programme of monitoring buildings at risk in East Devon could help to identify patterns or trends and would be a valuable resource to help the council manage the most vulnerable assets. A programme could be established for communities to help assess the condition of Grade II buildings in their local area, setting priorities within conservation areas, for example.</p>	Recommendation by H.E. due to lack of evidence over the condition survey being a current programme.
2.111	Text amendment	The National Landscape Partnerships have been actively involved in managing Scheduled Monuments at risk. East Devon National Landscape has been working on improving the condition of six at-risk assets with the help of volunteers.	Recommendation by DCC HET to remove out-of-date reference.
2.113	New paragraph	Under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the council has a statutory duty when managing conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising planning functions.	Recommendation by DCC HET.
2.131	Text additions and links in footnotes 41 and 42	<p>Design guides and other advice can be made more widely available and accessible to developers, residents, local businesses and local communities in general (including the Strategic Stone Study⁴² and Historic England’s Buildings Stones of England: Devon⁴³).</p> <p>⁴² Strategic Stone Study: A Building Stone Atlas of Devon</p> <p>⁴³ Devon. Building Stones of England</p>	Recommendations by DCC HET and the Jurassic Coast WHS (Hosted by Dorset CC).
2.132	New paragraph	The Devon RIGS group may also be able to help with identifying stone quarries in the area. It should be noted that some old stone quarries are	Suggested text provided by the Jurassic Coast WHS (hosted by Dorset Council).

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		geological SSSIs but this does not bar future extraction of stone for building conservation use, as it can be of benefit to the SSSI.	
2.133	Text additions	The development of agricultural buildings in remote areas, where the need for large scale storage facilities is increasing, needs to be handled sensitively due to possible visual impacts on an historic landscape. The re-use of redundant farm buildings also needs to consider and safeguard the existing character of the historic environment. It is likely that renovations and works on farmstead will encounter archaeology within or adjacent to it, as although some farmsteads may not be outwardly ancient, they may have originated from the medieval or post-medieval period, with historic fabric possibly contained within un-listed buildings.	Suggested text provided by the DCC HET.
Theme B Summary and Action Plan (Theme B – local list action 3)	New action	<p><i>Local list:</i></p> <ul style="list-style-type: none"> ■ <i>Publicise the Local List Guide for East Devon,</i> ■ <i>Receive and consider local list submissions</i> ■ <i>Work with the Devon Gardens Trust to adopt assets from their</i> <p><i>Local List of Parks and Gardens of Historic Interest into the East Devon</i></p> <p><i>Local List of Undesignated Assets.</i></p>	A currently ongoing action within the planning and conservation teams, also recommended by DCC HET.
2.143	Text addition	In East Devon, tourism and the visitor economy are important contributors to the vitality and vibrancy of the district's coastal and market towns and our rural communities. In turn, the traditional buildings, historic landscapes, and accessible archaeological monuments of East Devon form a vital part the tourist appeal.	Suggested text provided by the DCC HET.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.145	Text amendments	It is estimated that in 2022 the total value of tourism to East Devon local economy was £311.784 million, nearly 64 million more than the previous year, indicating a positive trend. Whilst more recent East Devon figures are not available, national trends would suggest that this positive trend has continued, with 7 out of 10 of the most popular paid visitor attractions in England being heritage attractions, 35% of UK citizens holiday destinations being influenced by the presence of cultural heritage and spending per trip on day trips now almost doubling pre-pandemic levels.	More recent data around tourism in East Devon provided by the Economy team to update the statics quoted in the strategy.
2.153	New paragraph	In addition to the built fabric of historic buildings, working with the historic landscape should be an important part of Local Nature Recovery (see: Natural England Guidance - Nature recovery and the historic environment) and will be one of the wider benefits of the forthcoming Devon Local Nature Recovery Strategy. Tree planting – for climate and biodiversity, can work with heritage, to restore historic landscapes (e.g. historic parks and gardens), restore traditional orchards, enhance the setting of Listed Buildings, while avoiding un-necessary harm to archaeological sites.	Suggested text provided by the DCC HET.
2.173	New paragraph	The ambitions of the Heritage Strategy and Local Plan run in parallel to and in collaboration with the councils Tourism Strategy to build on the cultural tourism opportunities across the district.	Recommended by the Culture and Economy teams to recognise the importance of heritage and the historic environment in the council's wider strategy for tourism.
2.180 (Discovering Dunkeswell Abbey)	Text amendments	Example: Discovering Dunkeswell Abbey (2018-19) .The Scheduled Monument of Dunkeswell Abbey is an historic ruin that was previously on the Heritage at Risk Register but has since been removed from this list. A series of activities has been completed, with	H.E noted that the previous case study was out of date, with Dunkeswell Abbey now no longer on the Heritage At Risk register. The paragraph has been rewritten, covering the work that has

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>stabilisation works in 2016, along with earthwork and river surveys, excavations, community engagement and tours run as part of the 'Discovering Dunkeswell Abbey' Project by Heritage Arts People CIC in partnership with the Blackdown Hills AONB from 2019-2020. This project was funded through the National Lottery Heritage Fund, with additional funding from Devon County Council and the Blackdown Hills AONB, with support from Historic England and the Dunkeswell Abbey Preservation Trust.</p>	<p>been completed by many teams and partners to achieve this.</p>
2.187	Text addition	<p>Some Neighbourhood Plans will also allocate sites for development and it is essential that local heritage assets, and their setting, are properly taken into account in this process. Early conversations with the Council's Neighbourhood Planning Officer and Historic England can help to raise the awareness of sensitivities regarding heritage assets and guidance will be produced to assist in identifying, and taking account of, the significance of heritage assets when allocating sites for housing development. Devon County Councils Historic Environment Team are also actively supporting Neighbourhood Plan groups, providing Historic Environment Record information, guidance and commenting on draft plans.</p>	<p>Recommendation by DCC HET.</p>
2.188	Text amendment	<p>There are many sources of information available and training for groups and individuals to participate in managing their local heritage. Publications such as 'The Building in Context Toolkit', 'Placecheck' and 'Understanding Historic Places' provide useful guidance from Historic England, whilst the Oxford Toolkit is a recommended guide on how to undertake a conservation area character appraisal. A Smartphone App</p>	<p>Recommendation by H.E to refer to the most up-to-date guidance and toolkits available.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>'Rate My View' is currently available for communities to record local points of interest. Devon County Council's Historic Environment Viewer and Heritage Gateway provide much information.</p>	
2.196	Text addition	<p>Working with this department we can help to identify heritage-led regeneration projects that will have social, economic and environmental benefits through, for example, improving tourist and town centre sites that are run down. Heritage has an important role to play in place-making and this may be part of a much wider programme working with other partners in the public and private sector. The Economic Development Strategy looks at the wider benefits to local communities and businesses where Heritage projects can play a part.</p>	<p>Recommendation by the Economy team, showing the link between the goals and objectives of the Heritage and Economic Development strategies.</p>
2.209	New paragraph	<p>Although no East Devon towns were included in the project, Historic England's 'High Streets Heritage Action Zones' (running from 2020-2024) is a recent example of the power of community engagement, cultural events and smart reuse of derelict and heritage assets to boost the economy and vitality of our high streets.</p>	<p>Recommendation by H.E to identify recent initiatives.</p>
2.213	New paragraph	<p>The towns of Exmouth, Honiton and Seaton have had Historic England/Devon County Council historic character surveys carried out between 2012 and 2016 as part of the Devon Historic Market & Coastal Towns survey.</p>	<p>Suggested text provided by the DCC HET.</p>
2.222	New paragraph	<p>Other potential sources of funding through DEFRA include the environmental stewardship schemes, natures recovery schemes and woodland grants, as these can all contain heritage components.</p>	<p>Suggested text provided by the DCC HET.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.223 (Arts Council England)	New paragraph	<p>Arts Council England Arts Council England are the national development agency for museums in England. Arts Council England champion, develop and invest public money from the government and the National Lottery to help develop museums for as many people as possible across the country.</p>	Additional source suggested by the Economy and Culture teams within the council.
Action Plan Theme A – Partners	Text additions	Policy staff to circulate information, Help from partner organisations such as DCC HE Team	Suggested by the DCC HET team to ensure partners work with the HET, especially around the Historic Environment Record.
Appendix 3	Further partners and organisations added	<p>Partners East Devon National Landscape Blackdown Hills National Landscape Devon and Cornwall Police Devon County Council Devon Tourism Destination Marketing Organisations (DMOs) Historic England Jurassic Coast WHS – Dorset Council and Devon County Council Museum Development South West (MDSW) National Churches Trust National Trust East Devon Neighbourhood Planning Groups & Parish Councils Pebblebed Heaths Trust (Clinton Devon Estates)</p> <p>Local History Organisations Axminster Historical Society Axe Vale and District Conservation Society Axe Valley Heritage Association</p>	Recommendations for amendments and additional organisations from multiple respondents.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Branscombe Project Broadclyst Local History Society Chardstock Historical Record Group Colyton Parish History Society Devon Archaeological Society Devonshire Association Devon Gardens Trust and Devon Gazeteer Devon Historic Buildings Trust Devon Historic Churches Trust Exmouth Civic Society Exmouth Historical and Archaeological Society Feniton History Group Hawkchurch History Society Honiton History Society Lympstone History Society Membury History Society Newton Poppleford Local History Group Otter Valley Association Ottery St. Mary Heritage Society Sidmouth Local History Group Sid Vale Association The Devonshire Association Whimple History Society Woodbury Local History Society</p> <p>East Devon Museums and Heritage Centres include: Allhallows Museum, Honiton Axminster Heritage Centre Axe Valley Heritage Museum, Seaton Colyton Heritage Centre</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Dunkeswell Airfield Heritage Centre Exmouth Museum Fairlynch Museum, Budleigh Salterton Sidmouth Museum Upottery Airfield Heritage Centre Whimble Heritage Centre</p>	
Appendix 4 Glossary	New appendix added to provide an explanation of terminology used throughout the document.	<p>This glossary is intended to assist readers by explaining how specific terms have been applied in the context of this Heritage Strategy. The glossary does not provide a definitive legal definition of terms, and readers should refer to legislation and national planning guidance for a full picture.</p> <p style="text-align: center;">Archaeology</p> <p>The NPPF (dec 2024) notes that a heritage asset is of archaeological interest “<i>if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point</i>”. Historic England applies the term to built, buried, waterlogged and dispersed assets, whether designed or not, informed by the NPPF definition⁶¹.</p> <p style="text-align: center;">Built Historic Environment</p> <p>As distinguished from natural landscape features, the built historic environment refers to man-made aspects of our surroundings. This can refer to a range of features including, but not limited to, buildings and structures, pathways, monuments and ruins, industrial and post-industrial landscapes etc.</p> <p style="text-align: center;">Cultural Landscape</p> <p>As defined by UNESCO, Cultural Landscapes represent a combination of both natural and built features, being illustrative of the evolution of human society</p>	Recommendation by DCC HT and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>and settlement over time under the influence of the physical constraints and/or opportunities presented by their natural environment and social, economic and cultural forces. Three types have been identified; landscapes designed or created by man, organically evolved landscapes, and finally associative cultural landscapes.⁶²</p> <p style="text-align: center;">Heritage</p> <p>A heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest.</p> <p style="text-align: center;">Historic Environment</p> <p>The historic environment results from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. The Historic Environment Record is a collection of information that provides the public with comprehensive and dynamic resources relating to the historic environment of East Devon.</p> <p>⁶¹ Definition within paragraph 2 (p.1) of: HEAN 17 Planning and Archaeology</p> <p>⁶² World Heritage Centre - Cultural Landscapes</p>	

Additional Feedback

Some of the feedback we received was either not directly related to the Heritage Strategy or did not result in any changes being made to the strategy document. The following table lists the comments that are relevant for the Committee, and our response or recommendations if required.

Respondent	Para or section of strategy	Additional Feedback	Response <i>(if appropriate)</i>
Historic England	p.4	We welcome the commitment to the participation of local communities in understanding, enhancing and positively managing heritage. The Council's work to date in prioritising, funding and drawing up templates for reviews of conservation areas is particularly noteworthy.	
Historic England	Local list of undesignated assets	We welcome the commitment to maintaining a list of non-designated heritage assets. Our recent consultation (closed 2 January 2026) on a revised Historic England Advice Note 7 (third edition) on local listing, and the subsequent guidance when published, may assist the Council in further refining its procedures: https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/	The local listing process may be reviewed and revised following the publication of the finalised guidance.
Historic England	Working with communities	The local authority's innovative strategy to mobilise community volunteers to help with the management of the historic environment is a bold and potentially effective way to respond to current financial strictures. We support East Devon's agenda that maximises community engagement and promotes the community's ownership of their heritage. Clearly there will remain a role for local authority heritage experts and other conservation professionals to guide, review and validate the outputs of this work.	
Historic England	p.36	We note the suggestion that Local Plan site allocations are supported by site assessments to ensure that they do not harm heritage assets. While we would stress that avoiding and minimising harm should be the starting point, unfortunately there are a number of site allocations in the emerging East Devon Local Plan that could result in considerable harm.	Local plan work is out of scope of this document. All feedback received during the first and second Regulation 19 consultations will be considered for allocation within the LP.

Historic England	p.43 Reviewing conservation areas	We welcome the commitment to a programme of review of Conservation Areas as it appears from the preceding paragraph that many have not been updated for 15-20 years.	Work currently ongoing.
Historic England	Design and the built heritage	Chapter 12 of the NPPF Achieving well-designed places, paragraphs 133-134, promotes the use of design guides and codes to provide a ‘local framework for creating beautiful and distinctive places’. We therefore suggest that the Council reconsiders its decision not to prepare an East Devon Design Guide (or guides and codes for local areas). National guidance does not provide the level of local nuance and specificity that is desirable to steer development and provide clarity to developers on the local context and design preferences.	Detailed master planning and design guidance will be prepared for Marcombe, with other design codes/guides likely to be produced for local areas or to cover specific matters where it is deemed necessary and resources permit. Neighbourhood Plans may focus on design where they consider it to be particularly important. When the updated NPPF comes into force, it may be necessary to produce further local design guidance to ensure particularly important characteristics or areas of East Devon are adequately protected (within National Landscapes for example).
Historic England	Theme C	We welcome much of the content of Theme C, which offers a broad and helpful guide to a range of measures that may be undertaken to heritage assets to harness their benefits to the environment and society, including the sensitive retrofit of historic buildings. The identification of potential benefits of linking heritage enhancements with policy areas such as economic development and regeneration is also helpful.	
Devon County Council Historic Environment Team	2.115-2.121	Proposed Actions and Theme B Summary – Could include action to work with DCC as Mineral Planning Authority to identify and permit sustainable sources of local building stone.	Links to useful sources such as the Strategic Stone Study and Devon Buildings stones have been added under 2.131. We note the potential to work with DCC for the permitting of sustainable sources of building stone in the future.

<p>K Williams (<i>Norman Lockyer Observatory Society</i>)</p>	<p>N/A</p>	<p>I am not sure where my comments would sit as the Norman Lockyer Observatory does not appear on any of your heritage lists, nor indeed on a map of sites of interest in East Devon. As a private individual I am horrified and worried about the future of the Observatory. As a director of the NLO I am uneasy about the proposed Community Asset Transfer for which we are currently preparing a business plan.</p> <p>Sir Norman Lockyer, discoverer of helium in the sun, and founder of the journal 'Nature' retired to Sidmouth in 1912 to land belonging to his second wife Mary Browne - her sister is remembered by a bridge in the Byes. Both Mary and her sister were renowned suffragettes, with much information held in the Sidmouth Museum. The archives at the NLO contain a wealth of lantern slides, documents, and other artefacts relating to Sir Norman, the Maclean family, and a complete set of 'Nature'. Running the site as an active resource in the manner in which it was intended would bring in many more visitors and revenue to the area. The historic telescopes, one of which belonging to Sir Norman, are working - so it is definitely not a museum, but a living resource. Visitors and students are particularly taken with the working Victorian telescopes, which could be used for current observations. Prof Tim Naylor and his team of astrophysicists at the University of Exeter are keen to look at the historic observations with a view to understanding how historic telescopes were used, as well as using historic data relating to gamma Cassiopeia which is still being studied for its unusual variability. I very much hope that the Norman Lockyer Observatory along with recognition of Sir Norman Lockyer and Mary Browne will be included as part of your long term vision for the area before heading down the CAT route which is unpredictable and dependent upon sufficient volunteers to run it. The site is worthy and would quickly repay, of paid staff who would have time and</p>	<p>This issue is out of the scope of the Heritage Strategy. Further discussion will be required with the respondent and potentially others involved with the NLO to better understand the situation and to consider what actions can be taken to resolve this matter.</p>
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		expertise to source funding and to open the site more often to visitors.	
East Devon Excellence	Theme: Widen Knowledge of the heritage of East Devon and its assets	What is the strategy to do this? East Devon Excellence has a website encouraging visitors and local to make the most of the region, it would make sense to promote places of interest on this site and via our social media channels	Potential work to be carried out in partnership with other teams within the council.
Otter Valley Association	Section 1 and 3 and Action Plan	This is a well written and useful document. We benefitted from the 2019 pilot held in East Budleigh, which helped produce the Conservation Area Appraisal. More of this work should be done, using the community. In times of local government cutbacks the area of conservation work is very under funded. Innovative ways of addressing heritage at risk and other heritage issues is required. Working with and harnessing the enthusiasm of local communities is one way of helping with this situation, and the lack of resources.	
Otter Valley Association	General	The Otter Valley Association considers this strategy to be a very useful document, building and improving on the previous strategy. East Devon is rightly famous for its fine heritage, which is of great importance, and must be preserved. Any document that helps with the understanding of our heritage, and how to preserve it is of great value to both heritage owners, builders and professionals, the community and the general public	
Seaton Town Council	General	It is disappointing to see that no celebrations are so far planned to celebrate the 25th anniversary of the inscription of the Jurassic Coast as a World Heritage Site being that it is the only Natural World Heritage Site in England and Seaton being the only place on the Jurassic Coast where you can see rocks from all three of the World Heritage Site's geological periods.	The council has been made aware of the 25 th anniversary. Events are out of the scope of this document and the planning team.

<p>Exmouth Town Council</p>	<p>General</p>	<p>However, to realise the Strategy’s aims fully, it is important that this community-led heritage evidence is consistently reflected in the emerging Local Plan, especially in relation to:</p> <ul style="list-style-type: none"> • Landscape protection policies Neighbourhood Plans often contain fine-grained, locally informed assessments of natural landscape character, tranquillity, views and settlement pattern. These should directly inform (and not be overridden by) district-level policies designed to protect valued landscapes, heritage settings and rural edges. Where Local Plan proposals—such as settlement boundary amendments or site allocations—affect sensitive landscapes identified in Neighbourhood Plans, the Strategy should reinforce the need for early dialogue, shared evidence and the protection of distinctive local character. • Housing targets and growth pressures While the Local Plan must accommodate housing need, the Strategy should clarify that heritage and landscape sensitivity must be a fundamental constraint in shaping growth options. Community-generated evidence in Neighbourhood Plans can help ensure that housing distribution respects historic settlement form, avoids erosion of important landscapes, and prevents cumulative harm to heritage setting. Aligning the Strategy with the Local Plan’s growth strategy will help maintain the balance between meeting housing requirements and safeguarding East Devon’s unique heritage and landscape qualities. 	<p>Local plan work is out of scope of this document. All feedback received during the first and second Regulation 19 consultations will be considered.</p>
<p><i>Joseph Watson</i></p>	<p>Section: various Paragraph: 2.9 and throughout Theme: B – Positively</p>	<p>Church buildings as community heritage assets</p> <p>Comment: Historic church buildings are often among the most significant heritage assets in East Devon’s towns and villages and frequently hold irreplaceable community histories and act as the largest community gathering space within their contexts.</p>	<p>Minor changes made to strategy document. Work with at risk heritage assets and conserving listed and non-listed heritage assets is a continual process, and mechanisms exist such as ‘Community Asset Transfer’ and ‘Assets of Community</p>

	<p><i>managing our historic environment</i> <i>Action: various</i></p>	<p>The strategy does not adequately reflect the risks to these buildings within the plan period. Demographic trends suggest these buildings will face acute pressures relating to maintenance, capacity for upkeep, and long-term viability, with some 5% of churches facing possible closure in the period 2026 to 2030 (ref. https://www.nationalchurchestrust.org/survey). Unmanaged decline could lead to closure, loss of access, or disposal in ways that reduce public benefit and community connection irretrievably, and impact East Devon’s tourism economy.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Work with relevant partners including the National Churches Trust, Devon Historic Churches Trust, Church of England (Diocese of Exeter) and other denominational representatives, to develop an early warning and prioritisation approach, supporting better visibility of vulnerable buildings and the likely timescales of risk. Support the development of partnership frameworks and community support groups (ref. Friends of St Andrew’s Colyton (FoStA)) for sustainable use, recognising the importance of continued community access and appropriate new or shared uses where needed. • Provide clear signposting to funding routes, expertise and good practice, and support coordination where this helps prevent avoidable deterioration and loss of heritage value. • Ensure that consideration of church buildings as heritage assets is appropriately reflected in EDDC’s approach to heritage at risk, planning and community wellbeing, noting that the importance of these buildings is often not adequately reflected through the Listing process. 	<p>Value’ to provide communities with additional powers. However, the complex church ownership and funding models will make this work difficult to achieve with limited resources.</p>
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<p>Joseph Watson</p>	<p>Section: Various Paragraph: 1.8, 3.15, 2.196, 2.197 Themes: A and C Action: Various</p>	<p>Heritage crafts and traditional skills are a distinctive part of East Devon’s living</p> <p>Recommendations:</p> <ul style="list-style-type: none"> ☑ Work with partners including the Crafts Council and Heritage Crafts to develop a clearer picture of heritage crafts and skills present within EDDC, including the risks and opportunities associated with sustaining them as viable livelihoods. ☑ Support place-based pilot activity that improves understanding of craft-as business and its role in local economies, including low-cost interpretation, trails and coordinated “open” moments that can increase dwell time and local spend. ☑ Encourage partnerships that connect craftspeople with education, volunteering and learning pathways, where feasible, in order to strengthen visibility and intergenerational transfer of skills. ☑ Ensure that practical barriers to the sustainability of small craft enterprises are understood and, where possible, reduced through signposting, brokerage and alignment with town centre and economic development priorities. 	<p>The recommendations are considered to fall under the remit of the Cultural strategy, rather than the planning policy team. Crafts, skills and intangible heritage have now been noted within the Heritage Strategy at multiple points, including the ‘<i>living and literary heritage</i>’ paragraph, and the links to the Cultural strategy have been explained. However, it is not considered appropriate to insert these actions within the Heritage Strategy action plan produced by the Planning Policy team.</p>
<p>Simon Timms</p>		<p>Your updated Strategy is very much to be welcomed. It highlights the richness and diversity of East Devon’s heritage and will be beneficial in ensuring that this heritage is recognised in future deliberations about establishing unitary local government in Devon. very much support the Strategy’s</p>	

		aims as set out in para 1.48, particularly its focus on taking a partnership approach and involving communities.	
Simon Timms	Historic Churches:	I suggest that greater emphasis is placed on the outstanding heritage represented by the District's historic places of worship. Churches are shown in some of the illustrations and get some mentions (eg in para 2.9) but I feel they deserve more recognition for their heritage significance. A high proportion of East Devon's 240 Grade I and Grade II* listed buildings are churches/chapels and they have a key role in community life. I suggest that the Church of England, as the owner responsible for so many historic churches across East Devon's 70 + parishes, should be included alongside the National Trust and others in your listing of Key Organisations in paras 1.50 - 1.65. Perhaps it could replace the Jurassic Coast Trust in para 1.64 and Appendix 3 as that organisation no longer exists to manage the WHS.	Diocese of Exeter (C of E in Devon) added to appendix 3. As explained in our response to Joseph Watson's ' <i>Church buildings as community heritage assets</i> ' feedback above, further work will be difficult to achieve.

Heritage Strategy 2024 – 2042



East Devon – an outstanding place

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Cover image: *Broadhembury from the bridge*

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Executive Summary

The second heritage strategy for East Devon presents a summary of our heritage, its significance and its benefits whilst developing objectives for the future, with an action plan for the delivery of our recommendations. The strategy runs for 18 years from 2024 – 2042 to co-ordinate with the local plan timescale. It provides a very light touch review of the original strategy, building on the success of that document and delivering any outstanding actions.

The strategy focuses on the heritage assets of the district where the Council has a direct role and responsibility, or influence, in the decision making or management process. However broader designations that inform the strategy are also considered, such as the National Landscapes (formerly known as Areas of Outstanding Natural Beauty), which have a positive influence on the enhancement and management of the district's heritage.

Section 1 introduces and sets out the aims of the strategy, with information on the role of the Council and other organisations, sources of information and a background of legislation and policy.

The strategy for the future of our heritage is met through a range of aims and objectives which are explored in Section 2 through three themes. For each theme, objectives for the future are raised and actions to meet those objectives are recommended:

- Theme A describes our historic environment and provides information on its designated and undesignated heritage assets and their significance.
- Theme B sets out current policies and programmes relating to development management, conservation areas and heritage assets at risk, including our statutory duties.
- Theme C looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon. The impact and influence of other policies are considered as well as how we work with our communities and partners.

The actions raised in Section 2 are presented together in Section 3 with details of their implementation. This section also provides more information on resources, benefits and monitoring.

A brief description of our historic town centres and Conservation Areas are outlined in Appendices 1 and 2, with details of partners, local history organisations and local museums in Appendix 3.

The Heritage Strategy document is intended to meet a range of needs and interests and does not need to be read in its entirety. For this purpose summaries of the three themes are provided at the end of each theme. The action plan also provides a useful summary of the strategy for the next 16 years. Themes and actions are colour coded to help navigation of the document.

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Section 1: Introduction and Background



World Heritage Site coastline at Orcombe Point, Exmouth

Introduction

- 1.1. Welcome to the second heritage strategy for the district of East Devon, a place with a rich historic environment and an abundance of heritage assets, valued by its residents and visitors alike. It is a strategy that brings together information on our heritage and identifies challenges and opportunities for the future. The strategy seeks to involve the community and develop partnerships to make the most of the benefits that heritage can bring. This is an opportunity to celebrate together the outstanding heritage East Devon has to offer.

What is heritage?

- 1.2. [The government's NPPF defines the 'historic environment' for planning purposes.](#) The term heritage embraces history in all its forms, from buildings, spaces, art, artefacts and archaeological sites to ~~the historic landscape natural heritage~~ such as [the natural landscape, farm steads and hedgerows](#), flora and fauna and cultural heritage including place names, customs and traditions. The strategy will touch on many of these aspects but will focus on the role of the Council and how we can better work with partners and communities in the future, especially in respect of our built heritage. [A glossary of key terms can be found in appendix 3 at the end of this document.](#)

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The heritage of East Devon

- 1.3. The character of East Devon has evolved as a unique combination of historical influences. It is a predominantly rural area, with attractive market towns, picturesque villages and part of a World Heritage Site coastline to the south, with fine seaside resorts. We are fortunate in the district to have nearly 4500 individual assets of significant architectural and historic importance that have been listed nationally, including buildings, monuments and parks and gardens. In addition to these we have a wealth of assets of more local interest which also add richness to the landscape.
- 1.4. East Devon's exceptional natural landscape is reflected in the designation of two National Landscapes which cover around two thirds of the district. The diversity of the district's landscape and its underlying geology can be seen from the Exe estuary in the west through to the World Heritage Site 'Jurassic Coast' in the south, the Blackdown Hills to the north and the Dorset and Somerset borders in the east.

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4.4.1.5. [The National Landscapes are also valued for their cultural landscape value \(ie. Historic Landscape, built heritage, archaeology\) and the East Devon NL and the Blackdown Hills NL contain some of East Devon’s most important and distinctive historic landscapes and heritage assets. Overlapping the Jurassic Coast WHS and the East Devon NL, the East Devon Heritage Coast is a non-statutory designation that EDDC is responsible for. It is recognised for its natural beauty, wildlife, and heritage and designated to improve accessibility to the visitors.](#)

4.5.1.6. There is also a noticeable change in the character of our settlements, from the Victorian and Edwardian seaside resorts of the south coast to the Saxon and Roman influenced market towns of the central area and medieval farmstead groupings scattered throughout the district.

4.6.1.7. Historic buildings of considerable architectural merit are apparent in our towns and villages, telling a story of our social, agrarian and industrial legacy, whilst distinctive local building materials such as chert, cob and thatch retain a rural feel. The district is also notable for its archaeology, with a range of scheduled monuments including the remains of Iron Age hill forts and Roman forts, medieval castles and a wide scattering of Bronze Age burial sites.

Why have a heritage strategy for East Devon?

4.7.1.8. The National Planning Policy Framework¹ states that “plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk though neglect, decay or other threats. Our heritage assets, which are valued parts of the historic environment, are an irreplaceable resource that provide significant environmental, social and economic benefits for East Devon.

4.8.1.9. Positive conservation helps to preserve the assets themselves, but can also contribute to the local economy, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents. Town centres can have enhanced appeal and identity due of their historic past, which conservation and sensitive regeneration can help to maintain.

4.9.1.10. An understanding and appreciation of our heritage can encourage a feeling of identity, pride and belonging for residents, whilst heritage assets often play a central role in building local distinctiveness. A community’s sense of place and the quality of our lives, including health and wellbeing, can be enhanced through their contribution to the local environment, culture, education and leisure.

4.10.1.11. The East Devon Local Plan sets out its commitments, strategies and policies for the district’s heritage. The Heritage Strategy for East Devon provides more detail and will help to ensure that our historic environment and heritage assets are protected, maintained and enhanced to the advantage of future generations.

What does the strategy cover?

¹ [MHCLG DLUHC](#) (2024) National Planning Policy Framework, para 203

4.11.1.12. The strategy presents a central reference point for the historic environment of the East Devon district, providing information on its historic assets and a framework for the delivery of the Council’s recommendations.

4.12.1.13. Whilst all historic influences on the character of East Devon inform the strategy, the focus is directed towards our more tangible heritage assets, where the Council has a direct role and responsibility, or influence, in the decision making or management process. A heritage asset is defined by central government² as:

Heritage Asset

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”

4.13.1.14. Strategy: the overall strategy for the future of our heritage can be met through a range of aims and objectives. These are addressed in Section 2 through three themes:

- A: Understanding and appreciating our historic environment
- B: Positively managing our historic environment and
- C: Enhancing and benefitting from our heritage

The themes describe and analyse the district’s assets and the Council’s policies, programmes and management processes whilst identifying issues and opportunities for improvement. The objectives raised from each are developed into our plan of future actions.

4.14.1.15. Summaries: for ease of reading, each theme is followed by a summary of its objectives and recommended actions. The strategy does not need to be read in its entirety and these provide an overview of the information provided, objectives raised and actions proposed. An action plan is presented in Section 3, with all of the objectives and actions drawn from the themes, into one place.

² [MHCLG DLUHC](#) (2024) National Planning Policy Framework, Annexe 2: Glossary

4.15-1.16. Priorities: changes to public sector funding in recent years have meant limited resources within East Devon District Council both to manage our assets and to develop opportunities to benefit from our heritage. Our priority therefore continues to be ensuring that resources are managed accord to our statutory duties and agreed policies. Opportunities for cost effective solutions are also sought, including collaboration with existing and new partners and the potential for securing new sources of funding.

4.16-1.17. Local communities: the Localism Act (2011) introduced Neighbourhood Planning to Local Authorities, bringing new approaches and giving greater powers and opportunities for local communities to become involved in appraising and managing their local heritage. East Devon District Council has embraced neighbourhood planning, including policies relating to local heritage, with 27 'made' Neighbourhood Plans and another 15 in production (at the time of writing).

4.17-1.18. East Devon also has the advantage of many local historic interest groups and individuals in the district with extensive knowledge of our heritage assets. Support for the first Heritage Strategy demonstrated the high level of commitment from communities, Parish Councils and neighbourhood planning groups and the Council is keen to continue working with them to understand, enhance and positively manage our heritage. In this strategy we encourage and welcome the active participation and further involvement of our local communities.

4.18-1.19. Broader designations that inform the strategy are also considered, especially the National Landscapes, important parts of the landscape which are home to heritage assets and may form part of their setting. Others such as National Trust sites, Special Areas of Conservation and Sites of Special Scientific Interest are also mapped. These designations can have a positive influence on the enhancement and management of the district's heritage, which partnerships can help to maintain.

1.20. The strategy is not intended to provide an exhaustive description or analysis of our heritage but to provide examples of a range of our assets, whilst of other sources of information are detailed for further reference.

1.21. This strategy acknowledges that Heritage work programmes exist within other relevant Council Strategies; for example, the East Devon Cultural Strategy³ and East Devon Tourism Strategy⁴ and aims to work towards these shared goals. The Arts & Culture Network⁵ and Tourism Network⁶ are key district-wide groups with relevant work (such as the Cultural Tourism Map with heritage partner profiles⁷) and synergies with the priorities of the Heritage Strategy, and the potential for collaboration with these groups will be explored.

4.19.

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³ [culture-strategy-2022-2031.pdf](#)

⁴ [tourism-strategy-for-east-devon-final.pdf](#)

⁵ [Arts and Culture East Devon | Enriched through creativity](#)

⁶ [East Devon Tourism Network - East Devon](#)

⁷ [Culture - East Devon](#)

How has the strategy been prepared?

4-20-1.22. The first strategy was developed within the Council, engaging with specialist organisations, in particular Historic England, the East Devon National Landscape and Devon County Council Historic Environment Team and our Lead Councillor for Building Design and Heritage. It was then informed by public consultation responses from Parish and Town Councils, neighbourhood planning groups, local history and amenity organisations, interested individuals and statutory consultees.

4-24-1.23. As a light touch review of the original strategy, this updated version closely follows the same format but will deliver outstanding actions from the previous strategy as well as identifying new ones.



Fairlynch Museum, Budleigh Salterton, example of a 'Cottage Orné building

What has been achieved since the last Strategy?

4-22-1.24. Since the adoption of the original strategy in 2019, considerable progress has been made, particularly in achieving the short term aims. Delays associated with Covid and reduced resources have had an impact but, despite this, the Council has improved online access to guidance and undertaken extensive fieldwork.

4-23-1.25. Theme A objectives were to:

- Enhance understanding of heritage assets and their significance
- Widen knowledge of the heritage of East Devon and its assets
- Celebrate and promote the heritage of East Devon

4-24-1.26. Action: Provide information and guidance in the Heritage Strategy
Completed: the Heritage Strategy provides comprehensive information and guidance. Historic England, Devon County Council Historic Environment Team and East Devon AONB amongst other organisations acknowledged and commended the strategy on its comprehensive coverage of the issues.

4-25-1.27. Action: Provide links to further guidance through the Council's website
Completed: the new heritage webpage provides links to Historic England advice, national listings and reports, and the Devon County Council Historic Environment Record.

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4-26-1.28. Action: Develop improved web pages for the provision of information on heritage issues relevant to East Devon, including the Heritage Strategy
Completed: the heritage webpage has been improved to include information on the heritage strategy, the list of local heritage assets, an on-line form for nominations for local heritage assets, links to further guidance and information on the latest news and projects.

4-27-1.29. Action: Promote strategy and web pages; develop a publicity plan to include press and social media
Completed: A publicity plan was considered by the Heritage Working Group and implemented with a series of press releases. Articles appeared on Facebook and Twitter and through the press, including the Exmouth Journal, promoting the heritage strategy and its initiatives. [Heritage assets have been promoted through the new Cultural Tourism Map⁸, launched in 2024.](#)

4-28-1.30. Action: Support events such as the annual Heritage Open Days and the East Devon [AONB Heritage Conference. Promote heritage strategy and website at heritage events. Arts and Culture East Devon and East Devon Tourism Network promoted heritage events.](#)
~~AONB Heritage Conference. Promote heritage strategy and website at heritage events.~~
A Planning Policy Officer (heritage) and Conservation Officer supported events including:

- The East Devon AONB annual conference in April 2019 (short talk / discussion)
- EDDC Neighbourhood Planning forum in October (presentations and discussion)
- EDDC member training (presentation, quiz and discussion)

4-29-1.31. Theme B objectives were to:

⁸[Cultural Tourism Map - Culture - East Devon](#)

- ❑ **Positively manage the heritage assets of East Devon (Conservation Areas, Heritage at Risk and Local List)**
- ❑ **Encourage development which enhances distinctiveness**

4.30-1.32. Action: Prepare internal procedural guidance for conservation area review and management plans.

This has been completed, to include

- A new template for conservation area appraisal and review, including a process
- for updating the original (typewritten) text and transferring the hand drawn maps
- onto GIS.
- A new template for management plans, including updated legislation and policy
- A flowchart of the procedures to complete a conservation area review and
- management plan, including surveys, consultation, adoption and publication

4.34-1.33. Action: Develop a process for communities to help deliver reviews, including training and monitoring. Propose a suitable pilot scheme.

Completed: A process was established and criteria were developed for the selection of a suitable pilot scheme. East Budleigh was chosen as a pilot scheme and endorsed by Strategic Planning Committee. The process included

- Developing a programme of options working with a community group
- Working with partners to meet joint objectives.
- Enabling grant funding
- Sourcing a suitable consultant to deliver the main part of the training
- Developing a programme of training to be delivered by a consultant and EDDC staff
- Producing training material including presentations, plans and survey sheets, with feedback forms for participants to complete.

4.32-1.34. Action: Deliver a pilot scheme Conservation Area review involving community group/s to include local listed items. Monitor input, output, outcomes and estimate impact to inform future programme.

Delivery to date includes:

- Securing partners and funding including the East Devon AONB (Sustainable Development Fund Grant) and the Norman Family Trust.
- Establishing a training programme and material for the volunteers which can be reused in future projects
- Three days of training and workshops delivered by Locus Consulting, a specialist in heritage training and supported by a Planning Policy Officer (heritage) and a Conservation Officer for 14 members of the community.
- Training included the assessment of character and how to record it, understanding historic buildings and recording them in conservation areas and managing change in conservation areas, all of which included on site exercises, with notation of maps and completion of survey sheets to inform the East Budleigh Conservation Area Appraisal, Review and Management Plan.
- Producing a new Conservation Area Appraisal, Review and Management Plan for East Budleigh which meets all of the latest legislation, policy and guidance.
- Assessing, ratifying and publishing new items for the List of Local Heritage Assets
- Building skills and knowledge amongst the community to help protect and enhance the heritage assets of their area. All participants reported an improvement in their knowledge and understanding of conservation areas and commented that they found the training enjoyable, informative and inspirational.
- Publicity, including a series of press releases which were published on the EDDC Website, in the Exmouth Journal and on Facebook.

4.33-1.35. Action: Develop a programme to prioritise reviews over 12 years.

4.34-1.36. A programme has been considered, giving priorities to reviews based on criteria such as risk from development within Built up Area Boundaries, the condition of assets, the date of last review and the presence of active community groups with an interest in heritage. Research in June 2019 included an analysis of conservation areas within the historic town centres of East Devon with a view to bidding for Heritage Action Zone Funding. Information was gathered and assessed in particular for Axminster, Honiton, Ottery St Mary and Seaton conservation areas including heritage assets, empty buildings, traffic flow, active community groups and potential improvements that could be made. The resources needed to complete a review have also been considered. For example, some reviews may need to only be 'light touch' where not much change has been seen and there may be an active community group that could become involved in helping to update and review an appraisal, following on from the East Budleigh Pilot Scheme. New templates for Conservation Area Appraisal, Review and Management Plans have been produced to help with future reviews. Work to prioritise reviews is ongoing.

4.35-1.37. Action: Provide information and a link to the Historic England register of heritage assets at risk on the Council webpage:
A link has been added to the heritage webpage to the Historic England webpage which provides general information on heritage at risk and details of what is at risk locally.

4.36-1.38. Action: Produce a document advising communities on procedures for a Local List, with guidance on selection criteria. Public consultation and adoption.
Completed: A guide has been adopted and is published on the East Devon Heritage and Local heritage Assets webpage.

4.37-1.39. Action: Following adoption of a guide, receive submissions from communities and historic groups.
Submissions have been received from the Otter Valley Association and the East Budleigh Heritage Project and are being assessed. Some have been ratified and published.

4.38-1.40. Action: Set up procedures within the Council for assessing, recording and publishing a list of non-designated heritage assets
Detailed procedures have been established.

4.39-1.41. Action: Develop and deliver a programme based on items submitted, starting with a pilot scheme. Roll out to other areas subject to available resources.
All pilot scheme nominations for the list have been ratified and published. A programme has been established to assess a proposed list of nominations produced by the Otter Valley Association

4.40-1.42. Action: Build in heritage and local distinctiveness themes in the emerging Design Guide
Supplementary Planning Document, with a link to the Heritage Strategy. These themes have been included in the emerging Design Guide as important Characteristics however this has not progressed to adoption.

4.41-1.43. Theme C objectives were to:

- Work with partners and corporately to identify joint projects and maximise funding**
- Work with communities**

4.42-1.44. Action: Increase attendance at meetings or events with partner organisations to work

towards common goals

The Conservation Officer attended partner meetings including those organised by the East Devon AONB, Devon County Council and Historic England. [The Cultural Producer attended partner meetings including those organised by Museum Development South West and invited the National Lottery Heritage Fund to speak at an Arts and Culture East Devon Network meeting.](#)

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4.43-1.45. Action: Create Council working group to work towards joint objectives and coordinate projects and programmes. Provide website links to regeneration, economy and tourism sectors. This working group was established and was very successful however meetings ceased during Covid restrictions and the meetings have yet to be reestablished.

4.44-1.46. Action: Work with others to identify projects and sources of funding. Members of the Heritage Working Group have been productive in identifying new projects and funding including

- Heritage Action Zone and town centres funding: exchange of information
- Energy efficiency grants and loans, working with the Empty Homes Officer
- Energy efficiency in older buildings training
- [Through the UK Shared Prosperity Fund the Creative East Devon Fund, the Culture, Leisure and Tourism Fund, the Carbon Action Fund were also set up benefitting multiple local museums.](#)

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4.45-1.47. Action: Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage.

- Information on training opportunities from various sources have been gathered which communities can use. Links are provided on the East Devon Heritage and Local Assets webpage.
- [Arts and Culture East Devon have delivered a curated programme of free training attended by East Devon Museums. Topics have included: Fundraising, Marketing, Volunteer Recruitment and Retention, Carbon Literacy, Collections Care and Management, Governance, Accreditation, Care of Photography, Digital Accessibility and Natural History Collections Display.](#)
- Presentations from the East Budleigh Pilot Scheme are available for future training, for example on heritage significance
- Training material is available for the development of conservation area review and management plans, including notation and survey sheets.
- Training material has been compiled for a Grade II listed building condition survey, based on that developed by Historic England.

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4.46-1.48. Action: Produce a template to guide neighbourhood planning groups in site assessments [to ensure that heritage matters are appropriately considered in relation to heritage](#). A template has been produced.

Resource Limitations

4.47-1.49. Undertaking the actions identified in the first strategy have required a very significant resource commitment, particularly in establishing new processes, templates and sharing information. This has ensured that almost all of the short-term priorities have been met but it is not possible to dedicate the same degree of Council resources to strategy implementation going forward. This review commits to ensuring

that the new processes continue to be successfully implemented and that information is kept up to date, but there is a greater emphasis on training and supporting local communities to ensure that they are able to take on some of the assessment work and evidence gathering at the local level.

Aims of the strategy

4.48-1.50. The overall aim of this document is to deliver a positive strategy for the conservation and enjoyment of the historic environment, in accordance with local and national policy⁹. In more detail, it aims to:

- *Widen the knowledge and understanding of East Devon heritage by bringing together information and making it publicly accessible*
- *Identify the heritage issues, challenges and opportunities for East Devon and recommend actions for the future*
- *Involve the community and develop partnerships to make the most of the social, economic and environmental benefits that heritage can bring*
- *Support the East Devon Local Plan, informing our policies and the overall approach of the Council*
- *Celebrate the outstanding heritage that East Devon has to offer by promoting its assets and presenting a vision for the future*

The role of East Devon District Council and other organisations

4.49-1.51. There are many organisations, including Local Authorities, national and regional public bodies and local historic groups engaged in the planning and management of the historic environment; the roles of some are outlined below. Many have accessible information resources and details of these are provided.

⁹ Aim 4: Neighbourhood Plans comply with the Local Plan, which in turn complies with national policy

Key organisations and sources of information

East Devon District Council

4.50-1.52. The Council has a conservation team, which carries out a range of statutory and non-statutory duties. Statutory duties for Local Authorities include the designation, review and management of Conservation Areas, determining listed building consent, advising on unauthorised works and maintaining a 'Buildings at Risk' register.

1.53. The Council also has a responsibility under the National Planning Policy Framework (NPPF), revised in 2024, to maintain or have access to Historic Environment Records containing up-to-date evidence about the historic environment. It does so through a partnership with Devon County Council's Historic Environment Team which also provides specialist advice on archaeology within the district. East Devon District Council is also responsible for implementing the NPPF in terms of planning decisions affecting designated and non-designated heritage assets.

4.54-1.54. Under the Levelling-Up and Regeneration Act (LURA) 2023, the council must have 'special regard' to the desirability of preserving or enhancing heritage assets and their setting. This includes preserving or enhancing any feature, quality or characteristic of the asset or it's setting that contributes to its significance. 'Relevant assets' as described by the LURA include Ancient Monuments, Historic Parks and Gardens, Protected Wreck Sites and World Heritage Sites.

4.52-1.55. Non-statutory duties in the conservation of the historic environment relate mainly to policy, guidance and advice, which are also touched on in Theme B, 'positively managing our historic environment.'

Historic England¹⁰

1.56. Historic England is the public body that helps people care for, enjoy and celebrate England's spectacular environment, see: <https://historicengland.org.uk/about/what-we-do/>

1.57. The role of ~~this public body~~ Historic England includes is to advise government on the designation of Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Battlefields and Protected Wreck Sites identified by them or put forward by individual request, and managing the list of designated assets, as well as advising the government on matters of World Heritage. They primarily provide advice on Grade I and Grade II* heritage assets and deal with Scheduled Monument consents. Information is available on designated assets in East Devon including those categorized as 'at risk'.

4.53. Historic England has a formal role in the planning process, including being a consultee on Local Plans and on certain applications for planning permission and listed building consent

1.58. The organisation also carries out extensive research and monitoring of heritage assets and their value, and provides information on funding, with a comprehensive range of guides through their website. 'Heritage Counts' is an annual audit of

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¹⁰ <https://historicengland.org.uk/>

[England's Heritage, monitoring 'heritage indicators' for each region with information collected by the Historic Environment Forum and reported on by Historic England.](#)

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~~The organisation also carries out extensive research and monitoring of heritage assets and their value, and provides information on funding, with a comprehensive range of guides through their website. 'Heritage Counts' is an annual audit of England's Heritage, monitoring 'heritage indicators' for each region with information collected by the Historic Environment Forum and reported on by Historic England.~~

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English Heritage

~~4.54-1.59.~~ In April 2015, when the organisation changed its common name from English Heritage to Historic England, the charity officially called the English Heritage Trust took the name of English Heritage.

~~4.55-1.60.~~ The English Heritage Trust is a company and a registered charity that manages over 400 of England's historic sites, including Blackbury Camp in East Devon, and also provides information on England's history through the ages.

Devon County Council Historic Environment Team¹¹

~~1.61.~~ [The County Council maintains the Devon Historic Environment Record \(HER\) as a public record and on behalf of Devon's local planning authorities. The HER contains information about designated, locally listed and other undesignated heritage assets, including archaeological sites, historic buildings, landscapes and findspots, from the Palaeolithic \(Old Stone Age\) to the mid-20th Century.](#)

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~~1.62.~~ [The HER holds source material such as historic tithe and Ordnance Survey maps, RAF aerial photos from the 1940's, other archaeological aerial and ground photographs, published and unpublished material, available to view in person or online¹².](#)

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~~1.63.~~ [The HER contains links to reports and studies, such as Historic Landscape Character Mapping, revealing the evolution of East Devon's field patterns through the ages. Also, the Devon Historic Market & Coastal Towns Survey, which includes Exmouth, Honiton and Seaton.](#)

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~~1.64.~~ [The HER contains the results of systematic archaeological analysis and interpretation of aerial surveys, including conventional aerial photography from the 1930s to the present day, and recent remote sensed data \(LiDAR – Light Detection and Range\) revealing a wealth of evidence on the history of East Devon. These Aerial Investigation & Mapping Projects, funded by Historic England, have covered the South Devon Coast \(including East Devon\), the Blackdown Hills, and East and Mid Devon River Catchments.](#)

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~~1.65.~~ [Information held in the HER underpins the County Historic Environment Teams role in advising East Devon District Council on spatial planning and development management casework, and the County Council as the minerals and waste planning authority and highway authority. Also advising statutory undertakers for pipeline and cabling operations \(such as water, gas and electricity companies\), and conservation](#)

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¹¹ <https://new.devon.gov.uk/historicenvironment/>

¹² <https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/>

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bodies, farmers and land managers for national and local environmental stewardship schemes, tree-planting, and biodiversity habitat enhancement initiatives.

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1.56. The County Council also carries out a range of research and projects specific to Devon. Of particular interest is the database of Historic Environment Records (HER)¹³ it maintains, which provides information on archaeological sites, historic buildings, historic landscapes and other heritage features, including designated and locally listed assets.

1.57. Data includes historic tithe maps, aerial photos from the 1940's (World War II), photographs and other published material, available to view in person or online. Reports and studies are available, for example, on 'landscape character mapping' which can reveal the human activities of agricultural and industrial practices through the ages.

1.58. More recently, a technique called lidar (light detection and ranging), provides airborne remote sensed data to discover what can't be seen below the ground or tree coverage, uncovering a wealth of evidence on the history of East Devon.

1.66. For example, a recent project (2016-18) is centred mainly on the distinctive landscape of the Blackdown Hills where lidar will be used, along with aerial photos and other sources, to provide archaeological information. National Mapping Programme¹⁴ surveys also enhance our local Historic Environment Records in order to inform land management, conservation and research.

Devon County Council

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4.59-1.67. As the Highways Authority, Devon County Council is responsible for maintaining heritage assets such as historic bridges, milestones, traditional waymarkers, and its role in managing the public realm in East Devon's historic towns/villages

National Archives

4.60-1.68. The National Archives has information on records including that of land ownership, religious houses, royal grants and agricultural practices. Manorial documents are now collected, some of which are available to view online.

South West Heritage Trust

4.61-1.69. This Trust includes the resource Devon Heritage Centre which holds a large collection of records and published works relating to Devon's history including historic maps, illustrations, estate and manorial records.

National Trust

4.62-1.70. The National Trust (for Places of Historic Interest or Natural Beauty) is a large charity in England, Wales and Northern Ireland. The Trust aims to preserve and protect the heritage of the many historic houses and gardens it owns and has thousands of volunteers that help to care for these places. Information is available on a wide range of heritage issues.

¹³ <https://new.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/>
¹⁴ Grant funded by Historic England and undertaken by Devon CC and AC Archaeology

East Devon National Landscape ¹⁵ and Blackdown Hills National Landscape ¹⁶

~~1.63-1.71.~~ The National Landscapes are managed by partnerships which include national agencies, local authorities, land owners, conservation organisations and community groups. Both partnerships provide much information and advice on the environment and heritage of their area as well as support for community projects. East Devon National Landscape holds an annual Heritage Conference and both organisations have delivered heritage projects within East Devon.

The Jurassic Coast [World Heritage Site](#) Trust

~~1.72.~~ [The Jurassic Coast Trust closed in January 2025. Responsibility for the World Heritage Site now sits with Dorset Council and Devon County Council with East Devon District Council staff participating in site governance.](#)

~~1.64.~~ [This is the lead organisation co-ordinating the conservation of the Dorset and East Devon Coast World Heritage Site \(The Jurassic Coast\).](#)

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Local History Organisations, Heritage Centres and Museums

~~1.73.~~ There are many local historic societies and associations, heritage centres and museums providing more detailed information on the historic environment in their area, which are listed in Appendix 3. Information may also be available in libraries [and online, with publications and guides by societies such as the Proceedings of the Devon Archaeological Society.](#)

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[Museum Development South West](#)

~~1.65-1.74.~~ [MDSW exists to support museums and heritage organisations to develop and improve across all areas of their operation. They provide trusted, local and relevant development services to support museum and heritage organisations to improve, innovate, collaborate and celebrate. The Museum Development Officer for Devon works closely with the Arts and Culture East Devon Network, creating opportunities which build confidence and skills, encourage innovation, and celebrate our heritage and Culture.](#)

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¹⁵ <http://www.eastdevonNational.Landscape.org.uk/>

¹⁶ <https://blackdownhillsNational.Landscape.org.uk/>



Sidmouth Museum, Church Street (above)

Honiton Museum, High Street (below)



Background Legislation and Policy

Government Policy and Guidance

4.66-1.75. The Government sets out its objectives relating to the historic environment and heritage assets through the National Planning Policy Framework. Consideration of the historic environment and its heritage assets is a principal objective of sustainable development, which may be achieved through the three broad social, economic and environmental roles, which are mutually dependent.

4.67-1.76. The NPPF states that plans “should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats¹⁷”. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place

As it is periodically updated, it is important to note that when drawing up proposals, reference should be made to the most recent version of the NPPF.

4.68-1.77. National Planning Policy Guidance¹⁸ advises Local Planning Authorities to identify specific opportunities within their area for the conservation and enhancement of heritage assets, which may require the development of specific policies, and that they should “consider the relationship and impact of other policies on the delivery of the strategy for conservation”.

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¹⁷ [MHCLG DLUHC](#) (2024), National Planning Policy Framework, paragraph 203

¹⁸ [MHCLG DLUHC](#) (2014), National Planning Practice Guidance, Paragraph: 003 Reference ID: 18a-003-20190723, Revision date: 23 07 2019

Legislative Framework

~~4.69-1.78.~~ In addition to the Town and Country Planning Act 1990, the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest, and the Ancient Monuments and Archaeological Areas Act 1979 provides specific protection for scheduled monuments.

1.79. The Localism Act 2011 introduced Neighbourhood Planning which gives people greater power to influence development within their local area and to consider the impact of proposals upon heritage assets.

~~4.70-1.80.~~ The Levelling Up and Regeneration Act (LURA) 2023 proposed a number of changes and new provisions relating to the historic environment and the council's duties with regards to heritage, some of which have not yet been fully implemented. Following the implementation of the act, the council must now have 'special regard' to the desirability of preserving or enhancing relevant assets and their settings, such as Scheduled Monuments, Registered Parks and Gardens, Protected Wreck Sites and World Heritage Sites, alongside the statutory duty already in place for listed buildings and conservation areas. Other provisions introduced by LURA include the removal of compensation rights and mandatory consultation with Historic England for Building Preservation Notices (BPNs) used to assess buildings for listing, empowering the council to issue temporary stop notices for works being undertaken on a listed building without an LBC or without complying with the conditions of an LBC, and the potential for urgent works to be undertaken to all parts of a listed building if necessary. Finally, the act has raised the statutory status of Historic Environment Records (HERs) with relevant authorities' duty to maintain these lists, as Devon County Council does on behalf of the Devon Districts including East Devon.

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East Devon District Council Policy

~~4.71-1.81.~~ The new East Devon Local Plan is in the final stages of production. The new Plan will run until 2042 and will replace the current, adopted Plan.

~~4.72-1.82.~~ The emerging Plan will contain a suite of policies of particular relevance to the historic environment. These will be strategic policies and will include an overarching policy and then specific policies relating to listed buildings, conservation areas, Archaeology and ~~S~~cheduled ~~M~~onuments and historic landscapes, parks and gardens. The full Local Plan is available to view on the Council's website.

Section 2: Heritage Themes



Salcombe Regis

Theme A: Understanding and appreciating our historic environment

2.1. Our landscape has a sometimes complex pattern of fields, hedges, woodlands, farms and other buildings, road network, lanes and settlements which all form a part of the historic environment, created over many thousands of years by human activity. It is important to both understand and appreciate this environment and the heritage assets within it so that they can be positively conserved and enhanced for future generations to enjoy. The historic environment is defined by central government as:¹⁹

Historic Environment

“All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”

2.2. Two objectives of this chapter (and, indeed, these could be considered the main objectives of the strategy overall) are to widen the knowledge of the historic environment of East Devon and to improve the understanding of our heritage assets and their significance.

Proposed Action:

Provide information and guidance in the Heritage Strategy

2.3. Our district has a unique historic environment and range of heritage assets, which can be understood better by looking at what has gone before. Throughout the district there is much evidence of human occupation from the past in the present, from [the significant finds of Stone Age hand axes, particularly at Broom Quarry and camps, and concentrations of Bronze Age Barrows at Farway and Bramford Speke, and prominent Iron Age hill forts on the Greensand Ridges, spurs and outliers of the Blackdowns and coastal and inland promontory forts such as Berry Camp](#), to Saxon settlements and Roman roads, from medieval places of worship to Georgian, Victorian and Edwardian residences, from factories of the industrial revolution to World War II airfields, to name just a few.

2.4. In rural areas the history of both farming and extractive industries are evident in the vast number of marl pits used for improving soil, clay pits used for pottery industries, and in the distinctive medieval strip fields which may be glimpsed in places, beyond the high 'Devon' banks and hedgerows defining many of our country lanes. [The post-industrial landscape of the district includes deliberate planting of trees within former mineral extraction pits](#)

¹⁹ [MHCLGDLUHC](#) (2024) National Planning Policy Framework, Annexe 2: Glossary

[\(marl, clay, sand/gravel\) across the Blackdown and East Devon National Landscapes, that has created a now highly characteristic pattern of dispersed woodland.](#)

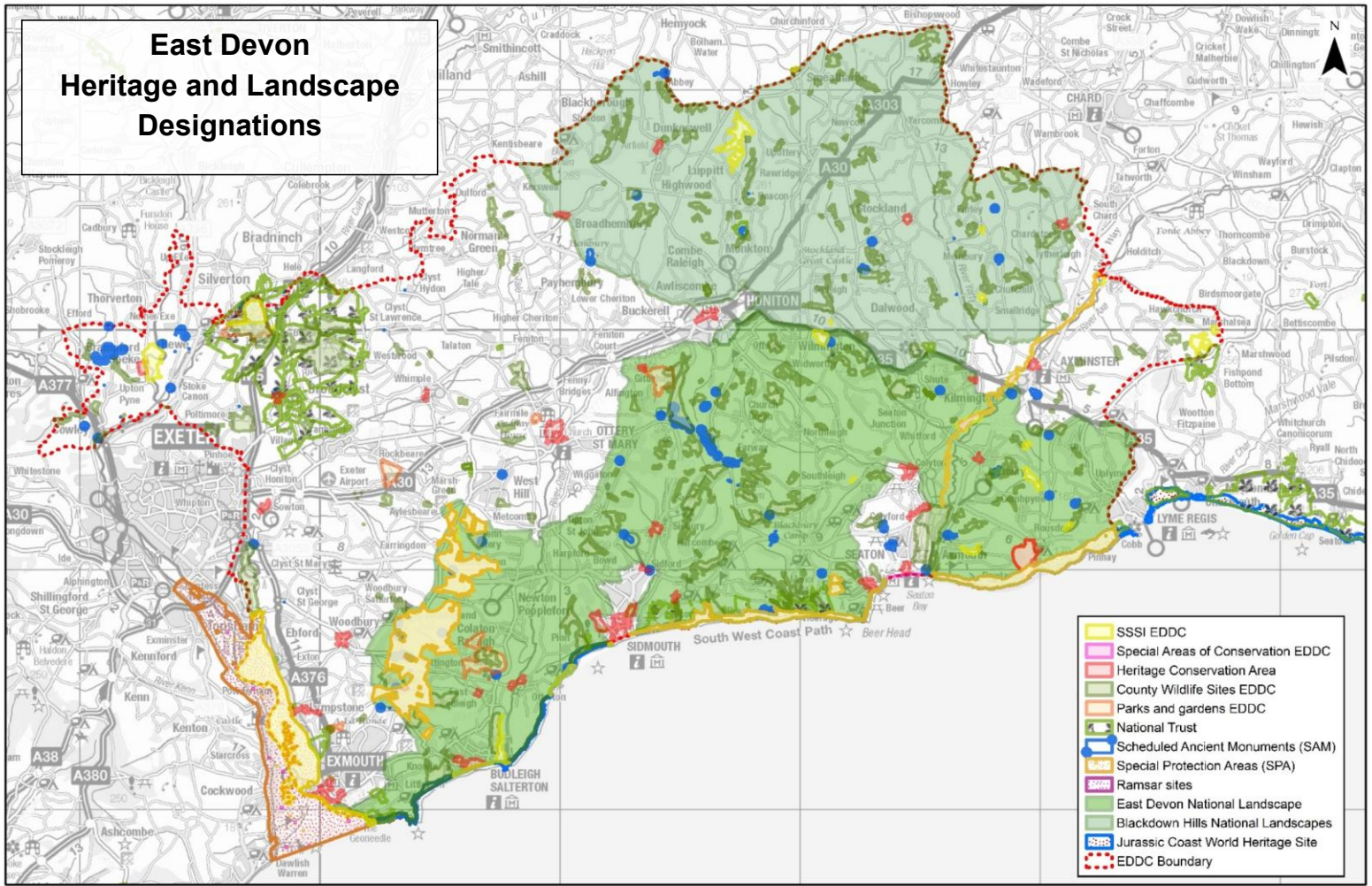
- 2.5. The district contains much evidence of the Roman conquest in its army camps and forts, and later some villas or highly Romanised farmsteads and enclosed settlements. Parts of the Imperial road system still survive, including what was the Dorchester to Exeter Road and 'Fosse Way.' [Alongside this, evidence of extensive opencast iron mining and iron smelting can be found around the Blackdown hills, with a probable iron industry link to the Seaton Down Hoard, one of the largest Roman coin hoards ever found in the UK.](#)
- 2.6. East Devon has a rich heritage of urban centres, varying greatly in nature and character. Ottery St Mary's Saxon origins can be seen in the characteristic 'star' shaped pattern of its central routes, whilst this and the market towns of Honiton and Axminster were centres of the textile industry from medieval times. Honiton is a classic example of a planned town by the local lord, whilst Axminster originated as a Roman [fort and small roadside small town, with a Saxon royal and ecclesiastical centre at the heart of the modern town. Many of these urban centres, with the valuable historic built and archaeological asserts they may contain, are protected by the 34 conservation areas across the district.](#)
- 2.7. Farmstead groupings are also an important local feature, especially those of medieval origin or planned-as a part of land estates, including those seen at Broadclyst, Gittisham and Broadhembury, [and the Rolle Estate in the Otter Valley](#), whilst some fine manor houses and ecclesiastical residences remain, such as the Bishop's Court at Clyst St Mary.
- 2.8. The quarrying of stone, such as that at Beer, and pottery making were other important industries at this time and local building materials and traditions including cob and thatch all contribute to distinctive local styles.
- 2.9. Many of East Devon's villages predate the 10th and 11th centuries, often centred around a parish church. As Christianity has been the main religion for more than 1500 years, churches form some of the most visible parts of our heritage, and the remains of an Abbey have survived at both Dunkeswell and at Axminster (Newenham Abbey). [Historic non-conformist architecture can also be found across East Devon, including Methodist and Baptist chapels \(e.g the Grad II* Loughwood Chapel\) Reading Rooms, Sunday Schools and Quaker meetings houses.](#)
- 2.10. East Devon is also rich in toll houses and coaching inns, [roadside features such as water pumps and troughs, Milestones, traditional finger posts/way markers,](#) and in assets linked to water power, such as mills, factories and hydraulic rams.
- 2.11. The Regency town of Sidmouth and other seaside resorts at Exmouth, Budleigh Salterton and Seaton all tell a story of their history through time, expanding with the development of railways. Good examples of the 'Cottage Orne' picturesque rustic buildings and later, fine Victorian terraces, Edwardian architecture and the Arts and Crafts style all contribute to distinctive town landscapes.
- 2.12. Meanwhile, villages along the coast retain a local character that has been largely unspoilt by the expansion of tourism. The Second World War has also left many traces including pill boxes, radar stations and airfields [telling the story of key events linked to the](#)

[area, such as the Battle of Britain \(RAF Exeter\), Battle of the Atlantic \(Dunkeswell\) and D-Day \(RAF Upottery, Dunkeswell and training structures in the Pebblebed Heaths\).](#)



Second World War remains of military building at Beer Head; Dunkeswell Airfield and Heritage Centre

East Devon Heritage and Landscape Designations



This map can be enlarged on screen, or printed in a larger format.

More localised maps can be provided on request

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Heritage assets and their significance

- 2.13. Historic England describes how “some parts of the historic environment are important to society as a whole or to a group within it and merit some level of protection or consideration.”²⁰ These are our heritage assets that future generations are likely to value too, for the same or similar reasons.
- 2.14. The term significance is used to describe (in heritage policy) “The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²¹
- 2.15. Significance is a collective term for the sum of all the heritage values of a place, which may be assessed through evidential, historic, aesthetic and communal categories.²²
- 2.16. Designation of an asset recognises the value(s) of its significance and gives it protection by law or policy for its management and enjoyment, now and in the future. [The setting of an asset, when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection. The setting of an asset, although not designated in its own right, is also afforded protection when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection.](#)
- 2.17. Designated heritage assets may be Listed Buildings, Scheduled Monuments, [World Heritage Sites](#), Conservation Areas, Registered Parks and Gardens, Battlefields or Protected Wreck Sites.

Nationally designated assets in East Devon

- 2.18. The most important heritage assets are formally recognised at a national [or international](#) level for their importance. In 2024, East Devon had 3,088 Listed Buildings, comprising nearly 4,500 individual buildings and structures (an asset may contain more than one individual building or structure), 8 designated parks and gardens and 112 scheduled monuments that are formally listed by Historic England. This includes two additions to the list since the last strategy, one Grade II* building and one Grade II building.

		Grade1	Grade II*	Grade II
Listed Buildings	3088	54	186	2,848
Scheduled Monuments	112			
Registered Parks and Gardens	8	1	1	6
World Heritage Site	1			
Conservation Areas	34			

Table 1: Designated Assets of East Devon District, March 2024

²⁰ Historic England webpage (2024) Heritage Conservation Defined
²¹ NPPF glossary 2024
²² For a full explanation see Historic England (2008) Conservation, Principles Policy and Guidance

2.19. The number of listed buildings changes over time and up to date information can be viewed through the Historic England website.²³ The District also has a World Heritage Site inscribed by UNESCO²⁴ [under criterion viii \(Natural\)](#)²⁵, and 34 Conservation Areas that have been designated by East Devon District Council.

The Conservation Areas of East Devon

2.20. Conservation Areas are one of the fundamental heritage assets, which are areas defined on account of the value and worth of the features they contain. Designation helps to improve our understanding of an area’s heritage and define what it is about the character or appearance that makes it special, and what should be preserved or enhanced. Legislation states that:²⁶

Local Authorities have a duty to “from time to time determine which parts of their area are areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance”, and to designate those areas as Conservation Areas.

2.21. When considering which areas should be designated, the Council looks at the quality and interest of an area as a whole as well as individual buildings and landscapes. A ‘character appraisal’ identifies the most significant aspects of the landscape, architecture and historic importance in our conservation areas.

2.22. Conservation Area appraisals also make an assessment of positive and negative features, and identify opportunities for improvement. For each settlement, our appraisals look at features including:

- The history of the buildings
- Topography and landscape setting
- Settlement form
- Important views and vistas
- Locally distinctive features and vernacular building styles
- Past and present activities and uses
- Streetscape and the public realm
- Green spaces and trees

2.23. Of the 7,000 (approximately) Conservation Areas in England, 34 have been designated in East Devon. They vary considerably in size and character, and cover parts of the main towns of Exmouth, Sidmouth, Seaton and Honiton, as well as the historic cores of smaller settlements such as Ottery St Mary and Budleigh Salterton.

2.24. Twenty Conservation Areas are within villages, mainly in rural areas, and nine of these are totally within a National Landscape. Four Conservation Areas are adjacent to the World

²³ <https://historicengland.org.uk/listing/the-list/data-downloads/>

²⁴ United Nations Educational, Scientific and Cultural Organisation

²⁵ [Criterion viii\(Natural\) - 'to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features'](#)

²⁶ Planning (Listed Buildings and Conservation Areas) Act 1990

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Heritage Site (“Jurassic Coast”) at Seaton, Beer, Budleigh Salterton and Compyne Rousdon.

2.25. The district’s Conservation Areas present a mix of forms, such as those with buildings arranged around a centre, appearing in a line, or more widely scattered, with many containing individual, groups and clusters of buildings listed in their own right as being of special architectural and historic interest.

2.26. East Devon’s Conservation Areas are diverse, from Victorian and Edwardian terraces and villas of our seaside towns in Exmouth, Budleigh Salterton, Sidmouth and Seaton, to those centred around medieval farmsteads of the Blackdown Hills, or around workers cottages such as in Gittisham. In the market towns of Ottery St Mary and Honiton a legacy of Saxon, Roman and planned medieval street patterns can be seen.

2.27. Conservation Areas vary in size from 3.46 hectares in Kilmington to 85 hectares at Compyne Rousdon (which is also a registered park). Ottery St Mary and Compyne Rousdon have large areas of landscape or garden. The Conservation Area with the largest built up area is in Budleigh Salterton comprising 30.27 ha, whilst Sidmouth Town Centre Conservation Area occupies a similar area of 28.91 ha. Conservation Areas in East Devon combine to make a total of approximately 518 ha.

2.27-2.28. [It is important to note that Conservation Areas may also contain high archaeological potential, as the historic cores of many settlements could have origins stretching back to at least the medieval period.](#)

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A brief summary of each Conservation Area is provided in Appendix 2

2.28-2.29. **Of the smaller villages:** eleven Conservation Areas are a part of the villages of Brampford Speke, Broadhembury, Chardstock, Colyford, Gittisham, Kilmington, Musbury, Salcombe Regis, Sowton and Stockland, often covering a large part or most of the village. Six of these are entirely within a National Landscape whilst two are partly in or adjacent to one (see Appendix 2).

2.30. **Of the larger villages:** there are ~~eight nine~~ Conservation Areas within the villages of Beer, Broadclyst, ~~Colyton~~, East Budleigh, Lypstone, Otterton, Sidbury, Whimble and Woodbury and are often located around the centre of the village. Three are entirely within a National Landscape (see appendix 2) whilst Broadclyst Conservation Area is partly within and surrounded by National Trust property.

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Gittisham village: example of workers cottages and map showing extent of the Conservation Area (yellow) and Listed Buildings (pink).



Distinctive cottages in the villages of Sidbury, Broadclyst and Broadhembury

Towns

There is a concentration of five Conservation Areas in Sidmouth including the town centre, Elysian Fields, Bickwell Valley, Sid Vale and Sidford, and three in Exmouth at Albion Street, Bicton Street and Louisa Terrace. There also is one Conservation Area

in each of the towns of Axminster, Budleigh Salterton, [Colyton](#), Honiton, Seaton and Ottery St Mary.

~~2.30-2.31.~~ [Six Five](#) of the Conservation Areas, in Axminster, Budleigh Salterton, [Colyton](#), Honiton, Ottery St Mary and Sidmouth incorporate the historic town centre. These are described in more detail in Appendix 1.

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Seaton: 19th Century 3 storey stucco villas in blocks of 4



Budleigh Salterton: late 19th Century housing with distinctive shutters and Exmouth: continuous terrace of late 18th and early 19th century properties

The Listed Buildings of East Devon

~~2.31-2.32.~~ Listed Buildings are considered to be the best examples of buildings of heritage importance. Older buildings that retain much or all their original built fabric and features are more likely to be listed. If a building is deemed²⁷ to be of special architectural or historic interest, it is considered to be of national importance and worth protecting and is included on the list of buildings administered by Historic England.

²⁷ by the Secretary of State (for Culture, Media and Sport)

There are 3 grades of listed building:

Grade I	Grade II*	Grade II
These are buildings of exceptional interest, sometimes considered to be internationally important. Only around 2.5% of listed buildings are rated Grade I.	These are particularly important buildings of more than special interest. Only around 6% of listed buildings are rated Grade II*.	These are buildings of special interest, which warrant every effort being made to preserve them. Accounting for 91.5% of all listed buildings, most domestic listed buildings fall into this category.

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Examples of Grade I (St Mary's Parish Church) and Grade II* (The Priory) Listed Buildings in Ottery St Mary

How Heritage Assets are chosen for listing

Since 2015, Historic England has been responsible for recommending buildings for inclusion on the statutory lists compiled by the Secretary of State. They consider buildings in 3 main ways:

Spot listing – looking at individual buildings brought to their attention by local authorities, amenity and historical societies and members of the public

Area lists – every part of England has been visited by expert fieldworkers and the best buildings selected against the listing criteria

Thematic listing – focusing on particular building types such as Industrial Heritage.

Older buildings are more likely to be listed:

- All buildings built before 1700, which survive in anything like their original condition, are listed
- Most buildings constructed between 1700 and 1840 are listed, though selection is necessary
- Between 1840 and 1945, only buildings of definite quality and character are listed, including those by renowned architects
- Post 1945, buildings have to be exceptionally important to be listed
- Buildings less than 30 years old are normally only listed if they are of outstanding quality and under threat.

In choosing buildings, particular attention is paid to:

- Special value within certain types, either for architectural or planning reasons or as illustrating social and economic history (for instance, industrial buildings, railway stations, schools, hospitals, theatres, town halls, markets, exchanges, almshouses, prisons, lock-ups, mills)
- Technological innovation or craftsmanship (e.g. cast iron, prefabrication, the early use of concrete)
- Association with well-known characters or events
- Group value, especially as examples of town planning (e.g. squares, terraces or garden cities).

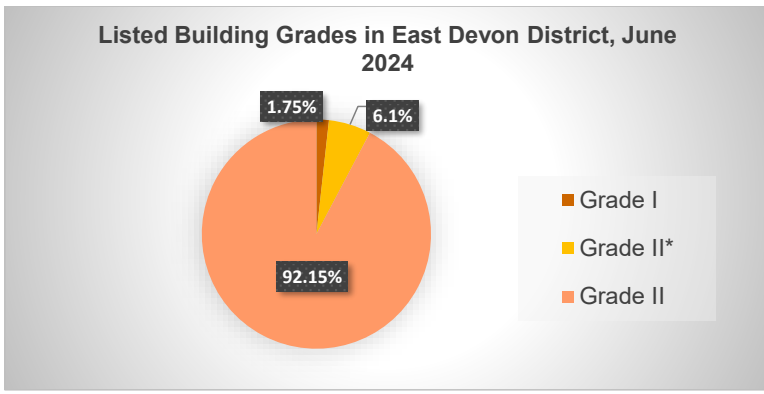


Table 2: Grades of Listed Building entries²⁸ in East Devon

2-32-2.33. The proportions of Grades I, II* and II are broadly representative of those in England as a whole, but with a slightly lower percentage of Grade I buildings.

The Parks and Gardens of East Devon

2-33-2.34. Formal parks and gardens and 'naturalistic created landscapes', were often provided alongside built features, especially grand country houses, though in some cases they may have been built as standalone features or integrated into a wider built fabric. In many cases these parks and gardens were also planted with significant collections of plants and trees and may contain built features within them such as summer houses or grottos that are of heritage importance in their own right.



Killerton Park and house, and Bear's Hut (originally a summerhouse built in 1808)

²⁸ A listed building entry may cover a number of individual units. Up-to-date information can be viewed at <https://historicengland.org.uk/listing/the-list/data-downloads/>

2.34-2.35. Given their heritage importance Historic England maintains a Register of Parks and Gardens of special historic interest in England, of which 8 are currently listed in East Devon: (See 2.49 for information on undesigned parks and gardens of local interest).

Bicton:	Grade I
Killerton House:	Grade II*
Rockbeare Manor:	Grade II
A La Ronde and the Point-In-View:	Grade II
Combe House:	Grade II
Rousdon:	Grade II
Connaught Gardens:	Grade II
Cadhay Park:	Grade II

2.35-2.36. [The Devon Gardens Trust hold research and information on all of Devons Parks and Gardens and maintain a local list. Through the National Historic Gardens Trust, they are a statutory consultee on planning proposals affecting all registered Parks and Gardens.](#)

Example: Connaught Gardens

2.36-2.37. This is an interesting example of a Registered Park. Adjacent to Sidmouth town centre and the sea front, the park lies partly within the World Heritage site and an extensive view of the Jurassic coast can be observed from this vantage point. The western side includes part of the National Landscape and a Grade II listed building, whilst the eastern side is within a Conservation Area. Adjacent to the park to the west is a County Wildlife Site and to the south a Site of Special Scientific Interest. The park is a meeting place for the community through its open air cafe and theatre, a greenhouse and many seating areas.

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Connaught Gardens Registered Park, Sidmouth

Archaeological heritage

2.38. Archaeological heritage can take many forms, including earthworks, ruined buildings and structures, artefact scatters, individual findspots, below ground archaeological features and deposits (sometimes manifesting as archaeological cropmarks), as well as ancient field patterns and ancient environmental evidence preserved in waterlogged conditions. This heritage ranges from the Palaeolithic (Old Stone Age) to the Cold War of the 20th Century including the early prehistoric feature, significant Romano-British, medieval and post-medieval heritage, as well as modern industrial and military archaeology. This heritage is found across East Devon's towns and villages, as well as in the countryside and on the coast.

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~~2.37-2.39. East Devon contains sites and finds dating from the oldest periods of occupation in Britain by humans and their predecessors.~~ Human activity in the district became frequent from 250,000 BCE and has left its mark with, for example, hand axes and other tools from the Lower Palaeolithic (Old Stone Age) found in the Axminster area.

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~~2.38-2.40.~~ From the 4th Millenium BCE (during the New Stone Age) the construction of monuments began, including the causewayed enclosure at Hembury, now a part of the landscape along with our Bronze Age barrows and Iron Age hillforts. These provide a link with our historic and prehistoric past giving an insight to the lives of our ancestors. Most of the landscape we can see today dates from the medieval and post-medieval enclosure of the landscape.

~~2.39-2.41.~~ Archaeological sites not only represent our heritage but can contribute to our sense of place. However, this legacy is subject to a growing range of pressures, both by humans and natural processes such as erosion.

The Scheduled Monuments of East Devon

2.42. The most important archaeological remains are formally designated as Scheduled Monuments.²⁹ Historic England carries out a programme of scheduling these nationally important archaeological sites, but anyone can make a nomination to Historic England.

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~~2.40-2.43.~~ In 2024, East Devon had 112 Scheduled Monuments, notably its prehistoric Bronze Age bowl barrows and Iron Age hill forts. It has a diverse range including many Hillforts or prehistoric enclosures (many with 'castle' or 'fort' in their names), 16 Motte and 'castle' Bailey castles, 1 Roman fort, 6 forts, at least 2 Roman Villas, 2 abbeys, 6 bridges, 8 crosses, a holy well, a prehistoric field system, a manorial settlement, ~~a Roman villa~~ and an 'Ice House'.

~~2.44-2.44.~~ However, more than 60 of the district's Scheduled Monuments are 'barrows', which are particularly abundant around Farway Hill, Gittisham, Woodbury Common and in the Rewe, Upton Pyne and Bramford Speke area. Barrows are a type of burial mound where earth, and / or stone is used to cover a tomb and 'bowl barrows' are named due to their appearance of an upturned bowl. They were created during the late Neolithic period to ~~middle late~~ Bronze Age (roughly 2500-1500 BCE) and provide important information on

²⁹ Monuments are protected by the Ancient Monuments and Archaeological Areas Act (1979)

beliefs and customs as they served a ceremonial or ritual purpose. Barrows are often isolated but many occur in groups and are described as barrow cemeteries, three of which are in East Devon.



Farway: Bronze Age barrow



Blackbury Camp Iron Age hill fort

Example: Farway Hill barrows form part of the most dense and extensive concentration of barrows in Devon. They are diverse in form and size and some are a part of a barrow cemetery, whilst their association with Farway Castle provides additional historic interest.

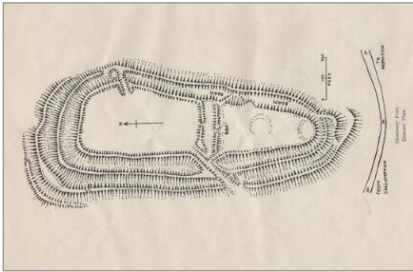
2.42-2.45. **Hillforts:** Characteristic of the Iron Age, the remains of hillforts at Woodbury 'Castle', Blackbury Camp and Hembury have been tested by excavation and reveal complex entrances and ramparts. Other examples are the Seaton Down (inland) and Berry Camp (coastal) promontory forts.

2.43-2.46. **Roman villas:** Evidence of Romanised buildings or 'villas' at ~~Seaton and Uplyme~~ Membury and Holcombe, a possible Roman post station or 'Mansio' at Seaton, and the Roman Fort at Axminster with a Romano-British roadside settlement indicate that people eventually accommodated to Roman rule in this area. There has also been evidence of Roman military inside the Scheduled hillfort at Hembury.

2.44-2.47. **Castles:** ~~The remains of structures, locally called castles but which are pre-historic hillforts, are also located at Belbury, Membury, Musbury, Sidbury and Stockland.~~ Many structures across the district called 'castles' are actually prehistoric Hillforts. Locally there is one genuine medieval motte and bailey castle at Castle Hill in Kilmington, and a moated (ditched defences) manor site at Cowley.

2.45-2.48. Concentrations of Scheduled Monuments can be found in many locations (see map 1), near Brampford Speke, at Killerton Park, Farway Common, and Woodbury Common, and monuments from multiple periods at Killerton Park (from the Iron Age to the 18th Century). ~~as seen on Map 1.~~

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Hembury Fort Drawing from the 1930's¹: This scheduled monument has a complex history from being a settlement during the Early Neolithic period, a Hillfort during the Iron Age and then a base for the Roman army in the first century. Its interesting history is currently included as part of a school curriculum.

Hembury Fort scheduled monument, Payhembury (above)



Part of Dunkeswell Abbey scheduled monument (see also page 48) and medieval churchyard cross at St John's the Baptist Church, Broadclyst (above right)

World Heritage Site

2.46-2.49. A World Heritage Site is "a natural or man-made site, area or structure recognised as being of outstanding international importance and therefore as deserving special protection."³⁰ Sites are nominated to and inscribed by the World Heritage Convention (part of UNESCO). The basis of world Heritage Site significance is the concept of Outstanding Universal Value. Natural England oversee the protection of the Sites of Special Scientific Interest that underpin the protection of the Jurassic Coast.

2.47-2.50. The Dorset and East Devon Coast World Heritage Site (also known as the 'Jurassic Coast') was the first natural environment designated World Heritage Site in England, and is one of only 17 in England and 31 in the UK. Its 95 mile coastline extends from the River Exe in East Devon to Studland Bay in Dorset. Most of the East Devon part also falls within the East Devon National Landscape. The coast's exposed sedimentary rocks give a unique insight into 185 million years from the Triassic, Jurassic and Cretaceous periods. [The town of Seaton has the unique position of being the only place on](#)

³⁰ Collins English Dictionary (2024)

[the Jurassic Coast where you can view rocks from all three geological periods in their natural environment, with fossil rich rocks to the east, vibrant red Triassic cliffs near the harbour, and white cretaceous chalk at Beer.](#) Further, there are heritage assets present as a consequence of the geology and a result of human interaction with it, for example Exeter Cathedral's quarries at Dunscombe and Beer, [with Beer stone first being exploited in the Roman period for works such as the decorative stonework at Holcombe Roman villa.](#)

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Parts of the World Heritage Coastline looking west from Beer Head revealing Cretaceous white chalk and greensand, and at Sandy Bay Cliffs, Exmouth made up of Triassic sandstone and mudstone.

Living and Literary Heritage Designations

[2.51. Although not directly relevant to East Devon's physical heritage, two additional UNESCO designations are important to note, these include the UNESCO City of Literature and the 2003 UNESCO Convention of Intangible Cultural Heritage.](#)

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[2.52. The City of Exeter was designated a City of Literature in 2019, recognising the significance of the literary heritage in the city and across the county. East Devon has associations with many celebrated literary figures, such as Dame Hillary Mantel and Coleridge, as can be seen in Literary Map of Devon.³¹](#)

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[2.53. Living Heritage \(also known as Intangible Cultural Heritage \(ICH\)\) is practised and living traditions, knowledge and skills, that can range from boatbuilding to singing, carnivals, dancing and dry-stone walling. As part of the UK's commitment to the 2003 UNESCO Convention for the Safeguarding of Intangible Cultural Heritage, an inventory of living heritage from across the UK is being set up, with submissions being accepted online³² by organisation and individuals. East Devon has a rich history of cultural heritage, from the Ottery Tar Barrels and Sidmouth Folk Festival to crafts such as Oak Bark Tanning in Colyton, to Lace making and the Hot Pennies ceremony in Honiton. Future community engagement could investigate gaining recognition and inclusion on the list for the living heritage of East Devon.](#)

Undesignated heritage assets in East Devon

[2.48-2.54.](#) The majority of heritage assets in East Devon, whether buildings, archaeological sites or areas of historic landscape character, do not enjoy statutory designation. Their

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³¹ [Literary Map of Devon \(Exeter UNESCO City of Literature\): 2025+literary+map+web.pdf](#)

³² [Welcome | Inventories of Living Heritage in the UK](#)

conservation relies on the planning system and positive management by land and property owners. The Devon County Historic Environment Record at the time of writing (2024) records 21,643 heritage assets (designated and non-designated) that fall within the early prehistoric to modern periods.

2.49-2.55. Some of these may have the same significance as a designated heritage asset but have not yet been considered for designation. This would include such sites as the small Roman fort at Pomeroy Wood, Gittisham, and parts of the World War II Taunton Stop Line defences in the Axe Valley. Others are of regional or more local importance, but all are irreplaceable and require consideration in planning decisions.

2.50-2.56. In addition to the eight parks and gardens included in the Historic England Register, thirty-one ~~twenty five~~ sites are included in the [Devon Gazetteer of Parks and Gardens of local historic interest](#) [Devon Gardens Trust Local List of Parks and Gardens](#), as important designed landscapes in the local context of Devon. Records are maintained by Devon County Council's Historic Environment Team. East Devon does not currently have any Registered Historic Battlefields, although the sites of the Western Rising (or Prayerbook Rebellion) of 1549 at Fenny Meadow, Woodbury and Clyst St Mary relate to events of national importance and so arguably merit consideration.

2.54-2.57. In Theme B the strategy sets out proposals, working with local communities, for the means ~~of~~ establising and managing a local -list of undesigned assets.

Landscape and natural environment designations

2.52-2.58. Whilst this strategy is primarily concerned with built heritage, East Devon also has areas of landscape and natural environments of great quality. In many cases these areas are home to heritage assets and form part of their setting, while landscapes and environments, having been informed or 'created' by past human activity such as parks and gardens, historic orchards or medieval field patterns, can be heritage assets in their own right. In this context, to some degree much of the landscape and countryside of East Devon can be seen to have a heritage value, though many traditionally farmed landscapes, in particular, have been 'improved' and lost much or some of their heritage value.



Landscapes: Blackdown Hills, view north from Honiton

National Landscape

2-54-2.60. A National Landscape (known as Areas of Outstanding Natural Beauty prior to 2024) is an important landscape with such outstanding distinctive character and natural beauty that it is protected in the national interest and has been designated by Natural England. East Devon has a landscape of exceptional quality, reflected in the designation of two National Landscapes that cover about two thirds of the District, and that also includes a small part of the Dorset National Landscape. National Landscape Management Plans actively promote the conservation of, access to and enjoyment of their historic environments.



Landscapes: Woodbury Common Pebblebed Heaths and view towards East Hill. An area of high environmental and heritage value with a concentration of landscape and heritage designations, within East Devon National Landscape

East Devon National Landscape

2-55-2.61. This area lies totally within East Devon and mainly in the southern third of the district (see map 1). It was designated in 1963 [originating from the East Devon Heritage Coast \(non-statutory designation\) that can still be found in the south](#), and covers 103 square miles (32%). The south includes part of the dramatic ‘Jurassic Coast’ World Heritage site. Inland, large expanses of heathland provide a contrast to woodlands and river valleys in the predominately pastoral landscape. The East Devon Pebble Beds at Woodbury and other commons form the largest single block of lowland heathland west of the New Forest. Steep sided Devon hedge-banks border fields and narrow country lanes, leading to the many villages and hamlets, with many houses and cottages built of local stone, pebbles, thatch and cob. [The EDNL has a rich prehistoric archaeological heritage, with the heathland containing numerous funerary and ceremonial monuments.](#)

Blackdown Hills National Landscape

2-56-2.62. This area includes land in both Devon and Somerset and covers mainly the north eastern third of East Devon (see map 1). Designated in 1991, the National Landscape is a relatively unspoilt, diverse rural landscape. Stretching from a prominent steep scarp in the north, the area dips gently southward as a flat-topped plateau to Honiton in the South, dissected by spring-lined valleys. [Prominent Ion Age hillforts can be found across the National Landscape, including Hembury and Dumpdon.](#) The traditional pattern of villages and hamlets along the valleys remain largely unchanged among some medieval patterns of small enclosed fields and narrow lanes with high hedge banks. Villages, hamlets, individual buildings and their settings form a vital element of the character of the Blackdown Hills, particularly because of the widespread use of chert, a local stone, and the area’s well

preserved, distinctive architecture. [The areas mining and quarrying heritage \(iron, whetstones, clay and agricultural marl\) has also left a significant legacy, with deliberate planting and natural regeneration of woodland over former extraction sites visible today.](#)

Natural Landscapes and Green Infrastructure

[2-57-2.63.](#) There are many environments in East Devon that are also protected on account of their biodiversity or geological interest. Whilst typically, heritage considerations or assets would not form part of the reason for their designation, it may be that human management and activity has ‘created’ the biodiversity or geological interest. There can therefore be heritage interests that overlap the more formal biodiversity or geological interests of their designation. [Heritage assets can often form a key part of Green Infrastructure provision, such as green lanes, disused railway lines, field patterns/systems, parks and gardens, churchyards and cemeteries, orchards, and former quarries.](#)

National and International Biodiversity and Geodiversity Designations

[2-58-2.64.](#) **Special areas of conservation:** These are [highly strictly](#) protected sites designated under the [EUC Habitats Directive relating to conserve important natural habitats and](#) species other than birds.

[2-59-2.65.](#) **Special protection areas:** These are designated under the EU and are strictly protected sites for rare and vulnerable birds.

[2-60-2.66.](#) **Sites of Special Scientific Interest:** These are designated by Natural England to conserve their wildlife or geology.

[2-61-2.67.](#) **Ramsar Sites:** These are designated for the conservation and wise use of wetlands and their resources, when they meet the criteria of international importance.

Further information on heritage assets

[2-62-2.68.](#) In addition to providing information within this document, the Council has met the action in the original strategy to provide improved web pages for heritage advice, guidance and information, including links to other organisations specialising in heritage. This will continue to be updated throughout the life of this strategy. It has the potential to host a forum for the exchange of information on heritage issues however this would require resources that are not currently available.

Proposed Actions:

- *Continue to develop and improve web pages on the Council's website for the provision and exchange of information on heritage issues relevant to East Devon*
- *Provide links to further guidance through the Council's website*

Promoting the heritage of East Devon

[2-63-2.69.](#) Apart from an improved website, the Council has further promoted the heritage of East Devon through publicity, hosting an occasional event which could include workshops

and attendance at other events in accordance with the original strategy. This work will be ongoing throughout the life of this strategy.

Proposed Actions:

- *Maximise opportunities to promote the Heritage Strategy and improved web pages, including use of social media*
- *Host an occasional heritage themed event / workshop for Members and community representatives (this may be undertaken as part of wider Neighbourhood Planning events)*
- *Support local heritage events, such as the as the annual Heritage Open Days and the East Devon National Landscape Heritage Conference, promote the Heritage Strategy and website at heritage events*
- *Encourage local groups and museums to engage with local schools*

Theme A Summary

- Our historic environment includes the built environment, archaeology and green landscapes which make our place distinctive
- Heritage assets are assessed by their 'significance' and the setting of an asset can also be significant
- Heritage assets may be nationally designated, or undesignated (but may be on a Local List)
- The District's designated heritage assets include Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas. East Devon also contains part of a World Heritage Site Coastline
- The District has 34 Conservation Areas varying widely in character
- Listed Buildings and Parks and Gardens may be Grade I, II* or II
- The District has landscape designations including National Landscape and many biodiversity and geodiversity designations
- East Devon has an abundance of undesignated heritage assets, some of which are of the same importance locally as designated ones

Objectives and Actions:

- 1 To enhance understanding of our heritage assets and their significance. Actions:**
 - Provide information and guidance in the heritage strategy
 - Provide links to further guidance through the Council's website
- 2 To widen knowledge of the historic environment of East Devon and its assets. Actions:**
 - Continue to develop improved web pages on the Council's website for the provision of information on heritage issues relevant to East Devon
 - Encourage local groups / museums to engage with local schools
- 3 To celebrate and promote the heritage of East Devon. Actions:**
 - Promote the strategy and improved web pages
 - Support and develop a calendar of local heritage events and anniversaries

4 To integrate environmental and heritage enhancement. Actions:

- Promote the inclusion of biodiversity considerations, nature recovery and ecological enhancement in heritage management
- Conserve, enhance and integrate biodiversity and ecological networks within heritage assets and their settings where appropriate, through informed management and guidance.

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Theme B: Positively managing our historic environment

2-64-2.70. Our heritage assets are an irreplaceable resource, which make a valuable contribution to the character of East Devon. They generate many benefits, as explored in Theme C, enriching the quality of life for residents and visitors whilst helping to boost the local economy.

2-65-2.71. Without management, heritage assets may start to deteriorate, through either human activities or natural processes such as weathering. It is important therefore to address this with the positive management of our assets, whilst supporting new development that enhances local identity and distinctiveness.

East Devon District Council staff resources for heritage work

2-66-2.72. The Council places considerable weight on the importance of protecting the built heritage of East Devon, but it does so with limited resources. As a consequence, the emphasis in Council work has been to undertake regulatory tasks that it is required by law to do (specifically determining planning applications and listed building consent applications), rather than the more proactive aspects of conservation. [The council conducts this work, in partnership with Devon County Council regarding access to the Historic Environment Record, and for the provision of archaeological planning advice.](#)

2-67-2.73. Combined with other economies due to the spending review within local government, this has meant very limited resources for conservation staff to carry out work such as monitoring buildings at risk, reviewing Conservation Areas and developing new opportunities through partnerships and communities.

Working with communities

2-68-2.74. The Localism Act (2011) encourages and gives additional powers for local communities to contribute to decision making in their areas. Since then, communities across the country have very successfully helped to assess what makes their location distinctive, appraised and reviewed Conservation Areas and management plans, monitored buildings at risk and identified assets for local listing.

2-69-2.75. The original strategy introduced a role for our local communities in some tasks, with Council support, and this has so far proved successful. There is a wealth of enthusiasm and expertise in our communities that could be further engaged and some actions have been updated to reflect the greater role that they can now play, especially where this will utilise guidance and templates produced in response to the original strategy. Our proposals are set out in more detail in relation to specific tasks in this section, and more generally with respect to training and building capacity within the community, in Theme C.

Proposed Action:

- *Facilitate and advise on training for local communities to assist in identifying and managing heritage assets, especially neighbourhood planning and other community groups with an interest in heritage (this Action is a part of Theme C)*

Designated heritage assets: development management

2.70-2.76. Most heritage assets are in private ownership and are maintained and managed by their owners. This is especially the case in respect of Listed Buildings, which are mainly domestic properties that are lived in by the property owners. These are typically well maintained and retain the features and integrity that warranted their listing in the first place.

2.74-2.77. However some maintenance and 'home improvements' can cause harm and should not in any case be undertaken in the absence of listed building consent (and potentially also planning permission). Historic England provides a range of guidance advocating good practice in the maintenance, repair and improvement of older buildings that are sympathetic to their historic character.

2.72-2.78. The Council has a range of legal and regulatory powers to manage heritage assets and development, whilst there is a facility to support and encourage good practice. For example, planning permission and listed building consent are two separate consent processes granted by the Council through regulatory powers.

2.73-2.79. The main means by which East Devon District Council manages designated assets is through the statutory powers it exercises as the Local Planning Authority.

2.74-2.80. The government sets out national policy with respect to the determination of planning applications which may affect heritage assets in the National Planning Policy Framework.³³

East Devon Local Plan Policy

2.75-2.81. In accordance with national guidance, the East Devon Local Plan elaborates on and provides more policy detail for the determination of applications. The document sets out policies for the management of development including the protection of archaeological sites, listed buildings, Conservation Areas and other heritage assets.

2.76-2.82. In most cases sympathetic development schemes can be bought forward but the Council will not grant permission for development involving substantial or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh the harm or loss. Criteria apply, which are set out in the Heritage Chapter policies of the local plan.

³³ [MHCLG DLUHC \(Dec 2024\)](#) National Planning Policy Framework Paragraphs 2072 - 221

2.77-2.83. In addition to this, the Local Plan allocates development sites. Site assessments are undertaken as part of the allocation process to ensure that, in principle, development will not harm important interests including by negatively impacting upon heritage assets or their setting. In some cases development may actually enable better revealing of an asset or better understanding or access to it, particularly if archaeological assessment is required prior to development taking place. Where sites are allocated development will still need to accord with the policies of the Local Plan and will still require planning permission. In line with national policy³⁴, further archaeological and/or historic building recording, in mitigation for the development's impact, may be required through planning conditions applied to any consent granted. ~~Further archaeological assessment and recording may be required through planning conditions on the planning permission. These conditions can lead to additional public and conservation benefits, with evidence and any archives being made publicly accessible, potentially through web-based educational outputs, information panels and excavation open days.~~

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Planning applications

2.78-2.84. Where development is proposed, there is usually a need to obtain planning permission and / or building regulations approval.³⁵ In considering planning applications the Council will apply the relevant local and/or neighbourhood plan policies and take into account heritage considerations and, specifically, potential adverse impacts on any heritage asset or the setting of a heritage asset that might arise and seek to secure the best outcomes whilst minimising adverse impacts.

Listed building consent

2.79-2.85. ~~Heritage Assets (Listed Building Consent is something of a misnomer, as it relates to heritage assets and is not restricted to buildings) and their settings are an important element of East Devon's character that the Council wishes to preserve. Under section 8 of the Planning (Listed Buildings and Conservation Areas) Act 1990³⁶, Listed Building Consent is required for works to demolish, alter or extend a listed building in a way that would affect its character or appearance as a building of special architectural or historic interest.~~ Alterations must be carried out with the greatest skill and care to ensure that changes are not detrimental to the special architectural and historic interest of the building.

2.80-2.86. Listed building consent, which is separate from any requirement for planning permission, is required if the works have an impact on the significance of the heritage asset. Where a listed heritage asset is involved in, or is the subject of a development proposal, it can be that both planning permission and listed building consent are required to allow for development to proceed. It can also be the case that development is acceptable under one consent but not the other, in which case it should not proceed.

2.87. The impact of a proposal on the setting of an asset contributes to a buildings significance as it provides a context. Although setting is not a heritage asset in itself, it is vital to an asset's significance. When considering development proposals the significance

³⁴ [MHCLG \(Dec 2024\) National Planning Policy Framework Paragraph 218](#)

³⁵ "development" is legally defined and some minor building works do not constitute development

³⁶ [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)

of any heritage assets and their settings should be established. Detailed guidance is available in publications on 'Setting' and 'Curtilage' through Historic England.³⁷

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2.84-2.88. [As with all planning applications, applicants for Listed Building Consent will need to submit sufficient information for a decision to be made. This may include an assessment of the history and historic fabric of the Listed building or structure and details of the proposed works. Conditions may be applied regarding the recording of any archaeological and historic building interest. Historic England, and other potential organisations such as amenity societies \(e.g. Victorian Society, Georgian Group, Twentieth Century Society etc.\) as statutory consultees may provide comments depending on the nature of the heritage asset.](#)

Listing enhancement

2.82-2.89. Historic England now offers a more detailed entry for listed buildings which sets out clearly why a building has been listed and where its significance lies. An 'Enhanced List Entry' may exclude parts of the property internally and externally including extensions and other structures within the curtilage that would have been included under an old List Entry, where they are not part of its significance or the reason for original listing. An Enhanced List Entry provides certainty and clarity, informing decisions on what changes are possible for owners and local authorities where Listed Building Consent is needed.

Listed Buildings Enforcement Action

2.83-2.90. The owners of listed buildings are encouraged to keep their historic buildings well maintained and in use, although they are under no statutory obligation to do so. However when a building is deteriorating, the Council may take action to require the owner to undertake essential works through a Section 215 Notice³⁸, s.48 Repairs Notice or a s.54³⁹ Urgent Works Notice. Non-compliance with a notice can lead to prosecution or work undertaken by the Council, with measures to recover the cost.

2.84-2.91. Unauthorised works to a listed building is an offence under Section 9 of the Planning (Listed Building and Conservation Areas) Act 1990. A person who is guilty of such an offence will be:

- Liable on conviction to imprisonment for up to 3months or a fine not exceeding the statutory maximum or both; or
- Liable on conviction to imprisonment for a term not exceeding 12 months or a fine or both. In deciding the amount of fine to be imposed on any person convicted, the court will consider any financial benefit which has been gained as a result of the offence.

2.85-2.92. The Council has a range of possible courses of action available to deal with cases of unauthorised works to listed buildings. These include the following:

- seek a prosecution;
- administer a formal caution. This is a formal process whereby the perpetrator signs a statement admitting the offence and submitting to the caution. It may be referred to at the sentencing stage if the same person is ever found guilty of a subsequent offence. It may also be taken into consideration when deciding whether or not to prosecute at a later stage for another similar offence;

³⁷ Historic England (2017) The Setting of Heritage Assets; (2018) Listed Buildings and Curtilage Advice note 10.

³⁸ Town and Country Planning Act (1990)

³⁹ Planning (Listed Buildings and Conservation Areas) Act 1990

- serve a breach of condition notice –note it is an offence to fail to comply with a condition on a listed building application;
- serve a temporary stop notice or stop notice;
- negotiate the reversal of works/works to address the unauthorised works;
- serve an enforcement notice to remedy the works –note that there are no time limits for issuing listed building enforcement notices;
- take no formal action. This may be accompanied by informal action, such as advising the alleged offender to ensure that the incident is not repeated.

2.86-2.93. In the case of empty properties, an improvement notice⁴⁰ may be served on owners initially, but if this is not effective works can be completed by the Council whilst charging the owner for these essential repairs. Council tax may be charged at 100% for properties that have been empty for over 2 years, whilst management orders and compulsory purchase may be actioned where other methods have not been effective.

Protecting National and Locally Important Archaeological Sites

2.94. Archaeological heritage is often vulnerable and easily damaged. Development won't be permitted if it would harm nationally designated sites, and that which would harm locally important sites or their settings will only be permitted if the need for development outweighs the damage to the archaeological interest of the site and its setting. Preservation in situ is considered to be the most appropriate means to ensure protection.

~~2.97.~~

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Protecting Scheduled Monuments

2.88-2.95. Any work to a designated monument requires Scheduled Monument Consent, for which applications are made to the Secretary of State for Culture, Media and Sport, with the consulting process administered by Historic England. Preservation in situ is considered to be the most appropriate means to ensure protection.

Protecting Registered Parks and Gardens

2.89-2.96. For any proposed development, the impact on the special character of a registered park or garden must be considered and is a material consideration in the planning process. The setting of a Registered Park and Garden is also a key consideration, with designed landscape views of particular importance. The Gardens Trust is the statutory consultee for works affecting all Registered parks and gardens, whilst Historic England will be consulted for all that are Grade I and II* listed.

Local List of undesigned assets

2.90-2.97. Many buildings, structures, landscapes and archaeological sites contribute to the special character of East Devon but do not meet the criteria for national listing. The Council recognises the valuable contribution that these heritage assets make to local areas and is reviewing how they are identified and publicised.

2.91-2.98. A feature of local interest can take the form of a building that that retains its historic form and external detail and makes a positive contribution to the architectural and

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⁴⁰ Section 11&12 Housing Act (2004)

~~historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value. This also applies to parks and gardens of high local importance, and to significant archaeological sites, such as flint scatters, historic field systems and settlement sites that may be visible above ground, or may only survive below ground, such as sites recorded as archaeological cropmarks. A feature of local interest is one that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value.~~

~~2.92-2.99.~~ Assets that meet the criteria can be placed on a Local List of undesignated assets which gives recognition to their importance and may be taken into consideration in development proposals, which can help to speed up the planning process. A Local List can also help to build a more comprehensive picture of an area's significance for future planning decisions.

~~2.100.~~ The previous Strategy committed to producing guidance on the process and selection criteria for submitting potential heritage assets to the Council for consideration and then establishing and maintaining a list of undesignated heritage assets. The Council has met these commitments and will continue to support local communities putting forward buildings and structures that are important to them. The list, and guidance, are available on the council's website [East Devon Heritage and Local Heritage Assets - East Devon](#)

~~2.101.~~ It is important to note that the local list is not an exhaustive list of all undesignated heritage assets. Many more assets, such as those found on the Historic Environment Record (HER), are also protected by national planning policy and Local Plan policies. The Local List is a dynamic subset that have been identified as being of particular importance to the community and will likely grow as awareness of the list grows and individuals, groups and organisations submit additional assets.

~~2.93-2.102.~~ The HER was created by the Devon Archaeological Society (DAS) in 1975 to identify sites of all levels of importance, to guide planning, land management and research. It was passed to the County in 1979. Sites on the HER may be of lesser, equal, or greater significance than sites that are on the Local List.

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Proposed Action:

Maintain and publish the local list of undesignated assets:

- *Continue to publicise the Local List Guide for East Devon, which advises on procedures and guidance on selection criteria*
- *Continue to receive and consider submissions from community and historic interest groups*
- *Work with the Devon Gardens Trust to adopt assets from their Local List of Parks and Gardens of Historic Interest into the East Devon Local List of Undesignated Assets.*

Heritage assets at risk

[2.94-2.103.](#) Designated heritage assets may be classified as ‘at risk’ due to negative changes through neglect, inappropriate development, [agricultural and forestry activity](#), crime or damage and can reflect or impact on an area’s social and economic decline.

[2.95-2.104.](#) Whilst most designated heritage assets of East Devon are in good or reasonable condition, a small proportion are classed as ‘at risk.’ There were no Conservation Areas at risk as [of January 2026](#) ~~at March 2024~~, in comparison with 6% [across](#) ~~in~~ England [in 2017](#).

[2.96-2.105.](#) From the Historic England Heritage at Risk register 2025³, which includes Grade I, Grade II*, Grade II Places of Worship and Scheduled Monuments there are 256 listed items defined as being at risk, an improvement on the 46 recorded in 2018 and considerably better than the national picture:

45 are Grade I: 2 Listed Buildings, 13 listed Places of Worship and 1 Registered Park
2 are Grade II*: 1 Listed Building and 1 listed Place of Worship
1 is Grade II: 1 Place of Worship
18 are Scheduled Monuments

Table 3: East Devon Heritage Assets at Risk Grading, 2023-2025 (Historic England Website⁴¹, [March 2024](#) [January 2026](#))

2 are category A: Immediate risk of further rapid deterioration or loss of fabric; no solution agreed: Church of St Lawrence (Grade I) and Poltimore House (Grade II*); the former is owned by a religious organisation, the latter is not in use and is owned by a heritage charity.

4 are category C: Slow decay; no solution agreed: 2 are the Tithe barn and stable at Bishop’s Court, Clyst St Mary (Grade I) and privately owned, the other 2 are Grade II* and Grade II churches

1 is category D: Slow decay; solution agreed but not yet implemented: This is a Grade II* church

The remaining 138 assets at risk do not have a priority grading

Table 4: East Devon Categories of Buildings at Risk 2025 (as per table 3)

⁴¹ [Heritage at Risk Register | Historic England](#)

Of the 25 assets at risk, 2 are noted as improving in condition, with 4 recorded as stable. Overall the situation has improved but a number of scheduled ancient monuments remain at risk of deterioration due to factors outside the planning system, such as coastal erosion and faring practices, with barrows being at particular risk from agricultural intensification and plant growth. Historic England do not monitor Grande II listed buildings at risk unless they are ecclesiastical buildings.

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Of the 26 assets at risk, 2 are noted as improving in condition and one is recorded as stable. Overall the situation has improved but a number of scheduled ancient monuments remain at risk of deterioration due to factors outside the planning system, such as coastal erosion and farming practices, with barrows being at particular risk from agricultural intensification and plant growth. Historic England do not monitor Grade II listed buildings at risk unless they ae ecclesiastical buildings.

Scheduled Monuments at risk

2-97-2.106. Scheduled monuments may be vulnerable to development but are also exposed to pressures beyond the planning system, such as agricultural intensification, forestry and coastal erosion, which may present the greatest threat. In the southwest, 16% of scheduled monuments were on the at risk register in 2016, a trend which has gradually decreased from 21% in 2009.

2-98-2.107. In East Devon 26 (40%) out of the 64 registered barrows are at risk, and are the majority of scheduled monuments at risk, suffering from deterioration due to causes such as plant or shrub growth, farming activities or animal burrowing.

Managing assets at risk

2-99-2.108. Assessing the overall condition of assets and identifying those at the most risk helps to provide a basis for prioritising actions and resources, where available, to mitigate pressures and threats to those assets. ‘Heritage at Risk’ is an annual survey, compiled by Historic England, of assets whose value is under threat, as shown in Tables 3 and 4. The condition of assets on the list are monitored and updated regularly by Historic England, with generally more frequent attention to those considered most at risk. New entries that are put forward for the list are also assessed by Historic England’s regional team in the Southwest.

2-100. ~~Historic England does not monitor Grade II listed buildings, unless they are places of worship, however have started a project, the “Grade II Listed Building Condition Survey”. This offers support and training for specialist and community groups and individuals to help identify any Grade II assets at risk. Training is currently available for volunteers through the Historic England website.~~

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2-101-2.109. ~~Historic England does not monitor Grade II listed buildings, unless they are places of worship., however, A~~ a programme of monitoring buildings at risk in East Devon could help to identify patterns or trends and would be a valuable resource to help the council manage the most vulnerable assets. A programme could be established for communities to help assess the condition of Grade II buildings in their local area, setting priorities within conservation areas, for example.

2-102-2.110. Providing a link through the Council’s webpages to the Historic England list of buildings at risk and a means of reporting information would help partners, organisations

and communities to identify new items for the list, and potentially help to monitor the condition of those on the list.

~~2.103-2.111.~~ The National Landscape Partnerships have been actively involved in managing Scheduled Monuments at risk. East Devon National Landscape has been working on improving the condition of six at-risk assets with the help of volunteers. ~~Meanwhile, the Blackdown Hills National Landscape have trained volunteers as Historic England Heritage Wardens to record the condition of Scheduled Monuments in that area, including some site maintenance work.~~

Proposed Actions:

- *Continue to provide up to date information and a link to Historic England heritage assets at risk through the Council's webpages*
- *Liaise with partners and organisations to implement the process for recording and reporting on assets at risk*

Managing and protecting our Conservation Areas

2.112. A range of planning controls exist to ensure that the special qualities and fabric of an area are not undermined by the loss or damage of important features, or damaged by inappropriate, insensitive developments. All properties are required to have their conservation area status recorded as a local land charge so that new owners are aware of their designation.

2.113. [Under section 72 of the Planning \(Listed Buildings and Conservation Areas\) Act 1990, the council has a statutory duty when managing conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising planning functions.](#)
~~2.104.~~

~~2.105-2.114.~~ The main regulatory role the Council has is to determine planning applications taking Conservation Area status into account, guided by an area's character appraisal. Proposals for development are only permitted where they would preserve or enhance the appearance and character of the area so it is important that any new development through siting, scale, design and use of materials is complementary to the character and makes a positive contribution to the appearance of an area.

~~2.106-2.115.~~ Other means of protection include control over the demolition of unlisted buildings and of works to trees, restrictions on the types of advertisement permitted and on other types of permitted development through an Article 4 direction.

~~2.107-2.116.~~ Further, the local plan describes how the Council will take positive steps to enhance character within the Conservation Areas, for example by encouraging an emphasis on the renovation and re-use of buildings rather than demolition and redevelopment.

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2.117. The Council are legally obliged to review Conservation Areas ‘from time to time’ to include an assessment of whether boundaries need to be amended and new areas designated, and also have a duty to formulate and publish proposals for the preservation and enhancement of conservation areas (management plans).

Threats:
Increased traffic and parking problems, erosion of character through insensitive repairs, out of character shop signage and replacement of frontages, vacant buildings, cluttered signage, street furniture and overhead utility cables.

Opportunities:
Increase in community involvement, improved knowledge for local community groups, input to neighbourhood plan, partnership working in regeneration areas and tourist locations, re-use of vacant buildings attracting grant aid, sensitive repairs, conversions and development using local materials with guidance.

Table 5: Examples of threats and opportunities within a conservation area



Examples of detracting features in Conservation Areas: Cluttered signage at Ottery St Mary (2013) and overhead power lines at Sidford (2018)

2.408-2.118. A ‘Conservation Areas at Risk’ programme monitored by Historic England collects information from local authority surveys. In 2024, no conservation areas were recorded as being at risk in East Devon, an improvement from 2014, when 3 were considered to be at risk.

Reviewing Conservation Areas and designating new areas

2.409-2.119. Over time, circumstances can change within conservation areas, parts can deteriorate or be improved, so there is a need to review our conservation area boundaries and consider the designation of new areas. In many conservation areas, however, there may be no need to revise a character appraisal, and a review may confirm that the original appraisal is still relevant.

2.410-2.120. The majority (26) of East Devon’s conservation areas were fully appraised in 1999 and were subject to a programme of interim review during 2008 – 9. The remaining conservation areas were designated or subject to a full appraisal more recently, between 2007 and 2011.

2.411-2.121. It is proposed that we establish and undertake a programme of review for our Conservation Areas, including management plans where needed. Local communities may become involved in reviewing their Conservation Areas, starting with a supervised pilot scheme.

Management plans and Article 4 directions

2.412-2.122. Management plans can be developed from up-to-date appraisals which identify threats and opportunities for the future of a Conservation Area, and set out priorities. Management proposals need to present clear design guidance based on the threats or vulnerabilities identified for an area and to be made available to residents and others involved in planning decisions.

2.413-2.123. An Article 4 direction may be applied to remove specific permitted development rights, where an accumulation of minor works through permitted development may undermine other positive work being carried in a conservation area. An example may be the removal of permitted development rights to alter windows or railings, in order to preserve the character of street facing facades.

2.414-2.124. However, the government advises that Local Authorities should consider making an article 4 direction only in exceptional circumstances where the exercise of permitted development rights would harm local amenity, the historic environment or the proper planning of the area.

Proposed Actions:

- *Deliver programme of Conservation Area reviews, including management plans*
 - *Identify priorities for review e.g.*
 - Where a Neighbourhood Plan is proposed*
 - Where regeneration/other investment is required or proposed*
 - Where significant change is anticipated*
- *Implement the process for communities to help deliver reviews, including training and monitoring*
- *Determine if any parts of the district merit designation as a Conservation Area by conducting a regular review*

Local distinctiveness promoting high quality new development

2.415-2.125. An understanding of heritage matters and applying sound vernacular design principles in new development can greatly assist in securing high quality development in the future. A tendency towards ‘anywhere design’ prompted by economic pressures and an

agenda of urgent house building in recent years has sometimes undermined an area’s local distinctiveness. However, it is possible to design new buildings in a locally distinctive way.

2-116-2.126. This may be critical when it involves or is part of the setting of a heritage asset, but even when it is not, an understanding of the local forms and styles of design used in the past can be of great value in building future developments.

2-117-2.127. It will often be the case that new buildings need not be an imitation of the past (a ‘pastiche’) and in some cases this could actually be undesirable. Buildings can be designed in a locally distinct and contemporary way with an understanding of what makes a place distinctive or a building architecturally significant, whilst being informed by local materials and traditions. With heritage acting as a stimulus for good design in an area, such new buildings can inspire new development in the future.

2-118-2.128. Proposals in the previous strategy for a new Design Guide for East Devon have not been carried forward into this updated version as new, national guidance is to be introduced. There is an opportunity for Neighbourhood Plans to incorporate the important themes of heritage and local distinctiveness, and where they do so, this will be a material consideration in planning decisions.

The conversion of existing buildings

2-119-2.129. The Local Plan and National Framework promote the use of existing buildings to accommodate new viable uses where appropriate and compatible with policy. The potential benefits of this are explored in Theme C. The same principles of design using local traditions and materials can be applied.

Use of local materials

2-120-2.130. In the past, difficulty in transporting materials meant that many buildings were traditionally constructed using local materials. The variety of geology in East Devon has resulted in a broad range of materials being used, which are sometimes very localised so that the character and appearance of our settlements can vary greatly.

2.131. The Council encourages the use of traditional materials and methods in new and converted buildings as a means to help define and enhance the quality of the built environment. This can be promoted with examples of best practice, guidance on the use and sourcing of local material. Design guides and other advice can be made more widely available and accessible to developers, residents, local businesses and local communities in general ([including the Strategic Stone Study⁴² and Historic England’s Buildings Stones of England: Devon⁴³](#)).

2-124-2.132. [The Devon RIGS group may also be able to help with identifying stone quarries in the area. It should be noted that some old stone quarries are geological SSSIs but this does not bar future extraction of stone for building conservation use, as it can be of benefit to the SSSI.](#)

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⁴² [Strategic Stone Study: A Building Stone Atlas of Devon](#)
⁴³ [Devon. Building Stones of England](#)

Examples of local materials: Beer paving - local Beer stone and Beer workers cottages - local flint



Development in rural areas

2-122-2.133. The development of agricultural buildings in remote areas, where the need for large scale storage facilities is increasing, needs to be handled sensitively due to possible visual impacts on an historic landscape. The re-use of redundant farm buildings also needs to consider and safeguard the existing character of the historic environment. [It is likely that renovations and works on farmstead will encounter archaeology within or adjacent to it, as although some farmsteads may not be outwardly ancient, they may have originated from the medieval or post-medieval period, with historic fabric possibly contained within un-listed buildings.](#)

Examples of recent renovations



Use of Beer stone at St Giles and St Nicholas parish church, Sidmouth and the Parish Church of St Andrew, Colyton. Renovation with cob and thatch, Otterton

Proposed Actions:

Encourage development which enhances distinctiveness:

- Provide links to further guidance which address the most common issues
- Provide information on the website to include sourcing of local materials, in particular a stone quarry guide
- Update and publish shopfront guides and any other relevant guides relating to heritage:

- Audit existing local heritage guidance
- Identify areas/topics where new or updated guidance is required and which is most urgent
- Undertake updates based on priority

Theme B Summary

- *Heritage assets are an irreplaceable resource which may deteriorate without positive management*
- *The Council has a range of legal and regulatory powers to manage heritage assets however there are limited resources to do so*
- *Listed buildings consent may be required for works to Listed Buildings and enforcement action may be taken where such a building has been allowed to deteriorate*
- *East Devon has 46 designated assets at risk recorded by Historic England (in 2018), mainly scheduled monuments*
- *Conservation Areas require review and management*
- *The development of a Local List may help in planning decisions*
- *Encouraging good design and the use of local materials helps distinctiveness*

Objectives and Actions

1. Positively manage the heritage assets of East Devon. Actions:

Conservation Areas:

- *Implement the programme of Conservation Area review and encourage communities to help deliver reviews*
- *Determine if any parts of the district merit designation as a Conservation Area by conducting a regular review*

Heritage at Risk:

- *Provide information and a link to Historic England heritage assets at risk*
- *Liaise with partners and organisations to report on assets at risk*
- *Work with Historic England to review potential assets at risk and discuss strategies for dealing with them*

Local list:

- *Publicise the Local List Guide for East Devon,*
- *Receive and consider local list submissions*
- *[Work with the Devon Gardens Trust to adopt assets from their Local List of Parks and Gardens of Historic Interest into the East Devon Local List of Undesignated Assets.](#)*

2. Encourage development which enhances distinctiveness. Actions:

- *Provide links to further guidance which address the most common issues, on website*
- *Provide information on the website to include sourcing of local materials*

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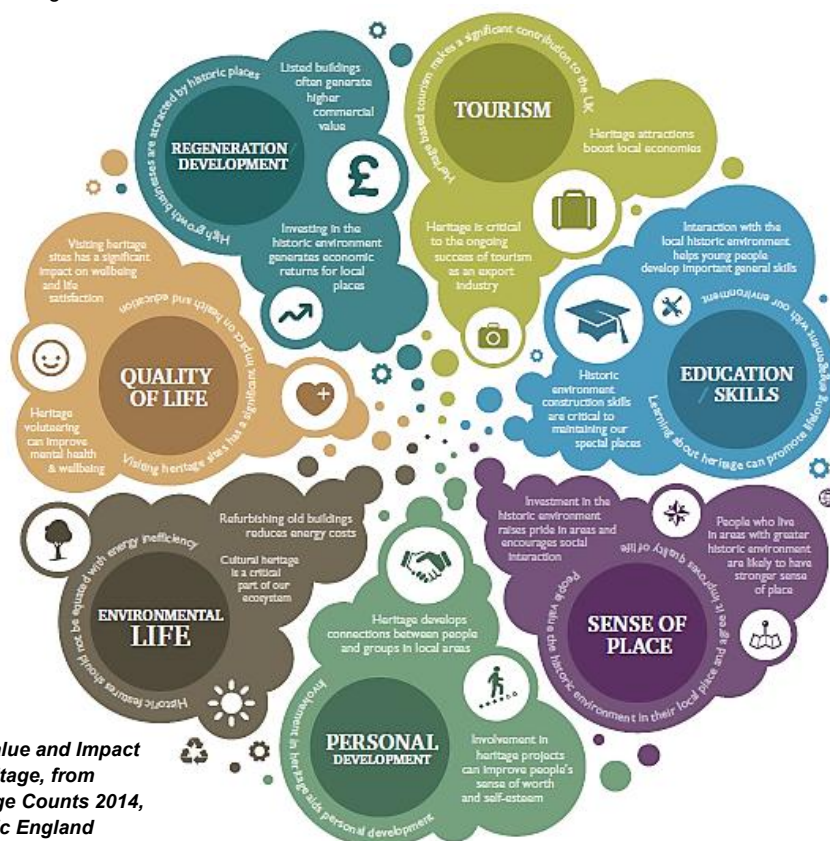
Theme C: Enhancing and benefiting from our heritage

The value and impact of heritage

2-123-2.134. The historic environment is an important feature of sustainable development and can provide social, economic and environmental benefits, which are often interlinked. Research by Historic England has identified many of these potential benefits, which are outlined below.

2-124-2.135. At a time of economies within the public sector, understanding the value and impact of our heritage is especially important. Working with partners and communities, we can help to enhance our heritage and make the most of these benefits. The involvement of local communities is vital to identifying and capitalizing on what is important for neighbourhoods and local areas.

2-125-2.136. Much of this theme looks to the future and some of the more proactive steps that can be taken identifying the need for, and opportunities gained from much greater partnership working. Being aware of and co-ordinating with other strategies and policies across the District encourages a coherent approach to make the most of our heritage assets.



Social, economic and environmental benefits

Social benefits

2.126-2.137. The heritage of a place can play a central role in local identity and distinctiveness, giving a sense of pride and belonging for local people and strengthening a community.

2.127-2.138. Further, the involvement of a community in heritage issues has been shown to improve well-being and quality of life. Heritage counts 2024⁴⁴ finds that learning about heritage promotes lifelong engagement, whilst both visiting and volunteering in heritage brings happiness and can improve both physical and mental health:

“In a survey, 93% of residents said that local heritage has an impact on their quality of life, and 80% think local heritage makes the area a better place to live”

Economic benefits

2.128-2.139. The economy, regeneration and tourism are often fundamentally linked with the historic environment and the sectors can work together to enhance its benefits. Heritage Counts (2024) describes the relationship between our national economy and heritage and how this market is experiencing strong growth, which is expected to continue.

2.129-2.140. Using the latest available national statistics (2022), England's heritage sector is estimated to have contributed £44.9 billion in Gross Value Added (GVA) to the UK economy in 2022 and supported the employment of over 523,000 workers ([CEBR, 2024](#)).

2.130-2.141. Findings from Heritage Counts 2024 also reveal that businesses are attracted by historic places, with the owners of creative enterprises especially attracted to historic buildings, and that listed buildings generate higher commercial returns. The results of surveys illustrate that investment in the historic environment generates growth and that there are economic benefits from the regeneration of historic places.

2.134-2.142. ‘Heritage indicators’ have been collected in the Southwest, mostly since 2002, indicating medium term trends which can help organisations to understand what is working and to set priorities for the future.

Heritage and tourism in East Devon

⁴⁴ Heritage Counts is produced by Historic England on behalf of the Historic Environment Forum (HEF) [Heritage Counts: Heritage Sector Trends, Insights and Data | Historic England](#)



[2-132-2.143.](#) In East Devon, tourism and the visitor economy are important contributors to the vitality and vibrancy of the district’s coastal and market towns and our rural communities. In turn, the traditional buildings, [historic landscapes, and accessible archaeological monuments](#) of East Devon form a vital part the tourist appeal.

[2-133-2.144.](#) The Local Plan identifies the towns and villages with built up area boundaries as the best locations for new tourist accommodation. ‘Sustainable tourism’ can be encouraged including quiet countryside pursuits, and local products and services that do not compromise the historic landscape and environment.

[2-134-2.145.](#) It is estimated that in 2022 ~~15~~ [tourism contributed £252.5 million to the](#) East Devon local economy ~~was £311.784 million, nearly 643.5 million more~~ [was £311.784 million, nearly 643.5 million more](#) than the previous year⁴⁵, indicating a positive trend. Whilst more recent East Devon figures are not available, national trends would suggest that this positive trend has continued, with 7 out of 10 of the most popular paid visitor attractions in England being heritage attractions, 35% of UK citizens holiday destinations being influenced by the presence of cultural heritage and spending per trip on day trips now almost doubling pre-pandemic levels⁴⁶.

[2-135-2.146.](#) Research into the economic impact of the Jurassic Coast World Heritage Site Designation in 2022 found that World Heritage Status of this coastline influences around £100m of economic activity each year⁴⁷.

Environmental benefits and the ‘Climate Emergency’

[2-136-2.147.](#) Heritage assets can provide inspiration for the design of new development both within Conservation Areas and in new developments. This may help to reinforce local distinctiveness, including the use of local materials and encourage high quality, imaginative design.

[2-137-2.148.](#) The UK Government have committed to a target to reduce greenhouse gasses be ‘Net Zero’ by 2050. Following this, East Devon District Council declared a climate emergency, aiming to be carbon neutral by 2040.

[2-138-2.149.](#) In 2024 the Office of National Statistics reported that, despite reductions, buildings remain the UK’s second highest greenhouse gas emitting sector whilst in occupation, largely from the use of natural gas and other fuels. If targets are to be met then not only do we need to *adapt* our buildings to be resilient to events such as flooding and higher temperatures, but to *mitigate* the effects, by reducing carbon emissions during the lifetime of a building. It is also important to note that the statistics do not account for the ‘embodied carbon’ that is released during a building’s lifetime, particularly by the materials, transport and processes needed for construction and demolition. Indeed the Royal Institute

⁴⁵ [Business support and advice - East Devon](#)

⁴⁶ [The Contribution of the Heritage Sector to the Visitor Economy | Heritage Counts | Historic England](#)

⁴⁷ See Jurassic coast website ‘economic benefits’ for further details

of Chartered Surveyors estimates that more than half of the 'lifecycle carbon' from a typical residential dwelling is emitted before it is occupied.

~~2.139-2.150.~~ Finding ways of retaining our existing housing stock and other premises, including those of historic importance, is therefore vital to reduce the substantial amount of carbon needed to produce new buildings. Historic England⁴⁸ considers that "most traditional buildings... have an innate ability to offer greater resilience to our changing climate than their modern counterparts" where they are well maintained and adequately heated and ventilated.

~~2.140-2.151.~~ Traditional materials used such as clay and lime are breathable, absorbing moisture during wet weather and releasing it when the sun and wind dry a building. Energy efficiency measures that are not breathable can affect this balance, so care is needed. Adapting an historic building for climate change needs an even more sensitive approach to ensure protection of the heritage 'significance' that makes the building important.

~~2.152.~~ Despite these challenges, the organisation believes it is possible to improve the energy efficiency of all buildings without unacceptable harm to their significance, and has recently published Advice Note (HEAN 18): [Adapting Historic Buildings for Energy and Carbon Efficiency](#). The guide sets out approaches, clarifies policy and details the permissions that may be needed. It also offers typical ways of adapting historic buildings for climate change that may be acceptable, whilst prioritising interventions and minimising harm. It recognises that there is generally a balance to be found between protecting heritage assets and adapting them for the future, with adaptations not causing unacceptable harm. Each case is different, for example, there may be works to a listed building that are so harmful to their significance that they should not be allowed.

~~2.141-2.153.~~ [In addition to the built fabric of historic buildings, working with the historic landscape should be an important part of Local Nature Recovery \(see: Natural England Guidance - Nature recovery and the historic environment\) and will be one of the wider benefits of the forthcoming Devon Local Nature Recovery Strategy. Tree planting – for climate and biodiversity, can work with heritage, to restore historic landscapes \(e.g. historic parks and gardens\), restore traditional orchards, enhance the setting of Listed Buildings, while avoiding un-necessary harm to archaeological sites.](#)

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The Whole Building Approach

~~2.142-2.154.~~ As each building performs differently, the 'whole building' approach is described in the guide. It is an holistic method which explores a building in its context to find a range of 'balanced and effective solutions' that in summary:

- save energy and carbon based on an understanding of the building and how it performs,
- sustain the asset's heritage significance whilst avoiding or minimising harm,
- provide a safe, healthy and comfortable indoor environment for occupiers

Some useful principles on adaptations to note from the guide, are:

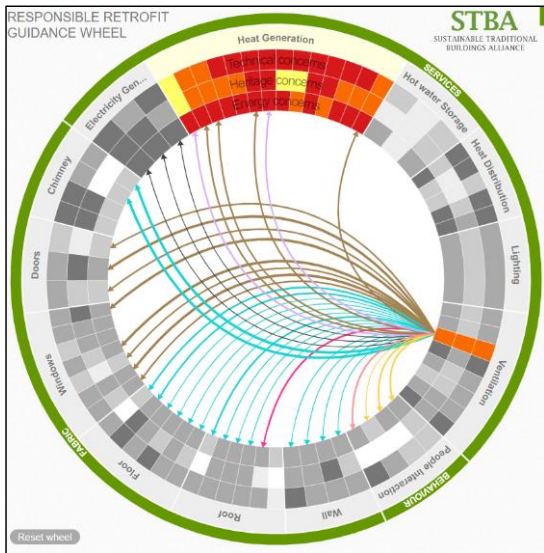
⁴⁸ Historic England (2017), Energy Efficiency and Historic Buildings on the Historic England website

- **Low risk (often low cost) work should be started first** - before more potentially harmful work. Low impact interventions on significance, such as adding thermostat controls or insulating an unused chimney flue, reduce energy loss at little cost.
- **Start small scale** - and continue in stages and make changes that are reversible where possible.
- **Tried and tested** repairs and improvements are preferable.
- **Energy efficiency improvements can be aligned with other works** - such as draft proofing whilst carrying out repairs to windows and doors.
- **Lifespan should be considered** - for example, well maintained historic windows may survive for over 100 years, in comparison with PVCu windows for less than 25 years.
- **Maintenance and repair is essential, reducing damp** - there are many small jobs that can be done every year to keep properties in good condition, including:
 - cleaning gutters and other rainwater goods
 - removing weeds from masonry
 - retouching paintwork on doors and windows

These can help to prevent damage, maintain value and save costs in the long term. Some tasks could be organised as a community project, for example within a conservation area.

- **Checks can be outlined** - using the whole house approach to ensure adequate ventilation to prevent damp. However, a careful balance must be struck as excessive draughts can waste heat.

[2.143-2.155.](#) There are some common retrofit mistakes to be aware of:



[2-144-2.156.](#) **The Responsible Retrofit Guidance wheel (left)** by the Sustainable Traditional Buildings Alliance is an excellent free interactive tool.

[2-145-2.157.](#) It depicts more than 50 measures that can be used for the retrofitting or refurbishing of traditional buildings and highlights the possible risks associated with those measures.

[2-146-2.158.](#) Each measure has a number of advantages and concerns, categorised into technical, heritage and energy. For example, installing photovoltaics indicates 3 heritage concerns, including 'loss of original external detail' – a 'high' concern and

'planning consent within a conservation area - a 'major' concern.

Common interventions outlined in the HEAN 18 guide

[2-147-2.159.](#) Although each building must be assessed on a case-by-case basis, the document provides useful guidance on works that are generally acceptable, and for which works listed building consent may be required.

[2-148-2.160.](#) Details are given for works relating to windows, doors, insulation, mechanical ventilation and heat recovery systems, heating systems and heat pumps, photovoltaic and solar thermal panels, solar slates, wind power and the addition of electric vehicle charging points.

[2-149-2.161.](#) For each measure the guide indicates what is likely to be acceptable, for example:

[2-150-2.162.](#) Windows:

- Draft-proofing: almost always acceptable and unlikely to need listed building consent (LBC)
- The installation of secondary glazing or slim profile double glazing within historic frames: both are generally acceptable, with the latter likely to need LBC
- The sensitive replacement of windows which do not contribute to a building's special interest: this may be acceptable but is likely to need LBC.

[2-151-2.163.](#) Insulation:

Insulation between or under floors and in lofts is also generally acceptable, with internal or within external wall insulation described as acceptable in some cases. Whilst external wall insulation is unlikely to be acceptable, the reinstatement of an historic render finish is almost always desirable.

[2-152-2.164.](#) Low carbon heating alternatives:

Such as heat pumps may be acceptable with careful siting, design and screening, as may solar panels if hidden from view, or incongruous. This includes careful consideration of their potential impact on significant views of the building, and where harm is avoided to the building's special interest.

2-153-2.165. Other external works:

May be suitable, to help buildings adapt to changing weather patterns, subject to permissions. Acceptable examples given in the guide are external awnings, shutters or blinds to reduce overheating, and careful improvements to rainwater goods to take increased rainfall.

Useful links:

HEAN 18 - <https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18>

HE's 'Energy Efficiency and Retrofit' webpages, which include a series of more detailed advice notes - <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings>

HE's 'Your Home' webpages provide more general advice for homeowners - <https://historicengland.org.uk/advice/your-home>

The Responsible Retrofit Guidance wheel - <https://www.responsible-retrofit.org/greenwheel>

Enhancing our heritage assets

The impact and influence of linked policy

2-154-2.166. It is important to consider a range of policies within the Council and those of other organisations within or neighbouring the District, which have an impact on this strategy, so that a co-ordinated approach can be made. In addition to policies to protect, conserve and enhance the historic environment and to recognise the importance of local distinctiveness in design, the (adopted and) emerging Local Plan(s) have set out policies for the economy, tourism, town centres, villages and neighbourhood planning which may compliment and impact on the Heritage Strategy.

2-155-2.167. Wider objectives and priorities in the local plan include:

- Promoting East Devon to create value and enjoyment of the area
- Actively seeking external funding and exploring alternative delivery mechanisms for a series of priority regeneration and development projects
- Creating opportunities through partnership and the planning process
- Strategically working with neighbouring authorities and other agencies, and
- Promoting and improving our town centres and high streets to encourage community identity, local services, more trade and stronger businesses

Town and village centres

2-156-2.168. Local Plan policies identify Town Centre Areas and Primary Shopping Areas which seek to ensure vitality and economic viability for town centres (including Colyton and the village of Beer) and encourage the active use of upper floors.

2-157-2.169. The Local Plan also includes several policies to encourage provision of new facilities and services and resist the loss of existing ones, especially where they are the last remaining facility or service of a type in a town or village centre. There are differences in the role and scale of centres, for example many towns include a large rural hinterland,

many village centres support local everyday, basic needs whilst some, like Beer, are also a visitor and tourist centre with specialist holiday accommodation.

Design and the built heritage

~~2.158-2.170.~~ [2.170.](#) The Local Plan stresses the importance of promoting high quality locally distinctive design standards and encourages the use of traditional materials and methods in buildings. This can inform and be integral to the work of designers, using local materials in sympathetic and traditional styles and forms. The previous Strategy identified the production of an East Devon Design Guide (Local Plan Supplementary Planning Document) as an action, however this is unlikely to be prioritised now as guidance is to be produced nationally. Instead, there is an opportunity to reinstate a ‘Member Champion for Building Design and Heritage’ whose role would be to promote all aspects of the historic environment in East Devon. The role described by Historic England⁴⁹ includes:

- generating enthusiasm for and awareness of the importance of the local historic environment
- helping to ensure that commitment to the proper care of the historic environment is embedded in all relevant activities and plans of the local authority, and
- Influencing and communicating with others to ensure benefits for the historic environment.

Tourism

~~2.159-2.171.~~ [2.171.](#) The Local Plan encourages tourism development, particularly where it enhances and capitalises on the geology, wildlife, coastline, countryside, historic environment and other assets that are unique to the District.

[2.172.](#) The economic policies of the Local Plan commit to supporting and facilitating high quality tourism and sustainable growth. Tourism can help to initiate the regeneration of settlements and the marketing of East Devon’s assets through information technology is encouraged.

[2.160-2.173.](#) [The ambitions of the Heritage Strategy and Local Plan run in parallel to and in collaboration with the councils Tourism Strategy to build on the cultural tourism opportunities across the district.](#)

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Local Plan Policy seeks to maintain and enhance the district’s visitor appeal “by working in partnership with East Devon’s tourism industry to promote the District as an all year round destination”

Working with local communities

⁴⁹ Historic England (2018) ‘What is a Heritage Champion’ webpage extract, summarised



[2-161-2.174.](#) Local communities are a valuable resource and we are fortunate in East Devon to have many specialist groups with expertise and knowledge of our local heritage. Residents, business owners and other interested parties may be involved in heritage issues through their parish councils, historic societies or neighbourhood planning groups.

[2-162-2.175.](#) It is beneficial for communities to help in assessing what makes our towns, villages and rural areas special. It is often a place's heritage that makes it locally distinctive and unique, which can give people a greater sense of identity and pride in their place.

[2-163-2.176.](#) During recent years of economic constraints within local authorities, different approaches towards conservation management have been emerging, with local communities becoming more involved in the appraisal of their Conservation Areas, local listing and monitoring buildings at risk. Nationally, local groups have, for example, helped to prepare character appraisals and management plans for Conservation Areas.

[2-164-2.177.](#) In East Devon, communities have taken on ownership and accountability of their area through neighbourhood plans, with volunteers driving the process forward. There is potential to develop this further to help manage heritage assets in the future, and this is outlined for particular tasks in Theme B.

[2-165-2.178.](#) Community involvement in programmes will help to increase the skills, knowledge and experience to help conserve our heritage, whilst the Council can in turn strengthen links with local communities, demonstrate public accountability and encourage innovative ways of working.

[2.179.](#) There are also opportunities for people to work on specific projects to protect and enhance heritage assets in their area, in partnership with specialist organisations and groups. Under careful supervision and guidance, individuals may get involved in many ways and with a variety of skills such as 'ground truthing' (looking for structures below the ground detected by lidar surveys), vegetation removal, mapping exercises and researching historic documents.

[2-166.](#)

Example: [Discovering Dunkeswell Abbey \(20187-19\)](#)⁵⁰

[2-167.](#) This Grade I listed building and Scheduled Monument is a ruin and a category 'A' building at risk. A partnership involving Devon County Council, Historic England, The Blackdown Hills National Landscape, Blackdown Hills Trust, the Abbey Church Trust and the local community will make a bid for funding from the Heritage Lottery "sharing heritage" fund in 2018-19. The partnership hope to work on many activities, including the

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⁵⁰ [Discovering Dunkeswell Abbey - Blackdown Hills National Landscape](#)

[investigation of a possible historic route for monks from Forde Abbey to Dunkeswell as a long distance walk, activities with primary schools, an earthworks survey with further ground truthing, vegetation removal from the site and the recording of Abbey walls. The Scheduled Monument of Dunkeswell Abbey is an historic ruin that was previously on the Heritage at Risk Register but has since been removed from this list. A series of activities has been completed, with stabilisation works in 2016, along with earthwork and river surveys, excavations, community engagement and tours run as part of the 'Discovering Dunkeswell Abbey' Project by Heritage Arts People CIC in partnership with the Blackdown Hills AONB from 2019-2020. This project was funded through the National Lottery Heritage Fund, with additional funding from Devon County Council and the Blackdown Hills AONB, with support from Historic England and the Dunkeswell Abbey Preservation Trust.](#)



Dunkeswell Abbey with the Church of Holy Trinity, Dunkeswell, in the background

Example: Woodbury 'Castle' Restoration Project (2017-18)

[2.168-2.180.](#) This is a scheduled monument which is also on the 'at risk' register. It is an Iron Age hillfort suffering from erosion, located within the Pebble Bed Heaths of Woodbury Common. A project has been progressed in partnership with Clinton Devon Estates, the East Devon National Landscape, Devon County Council, the Devon Archaeology Society, the Pebble Bed Heaths Conservation Trust and Friends of the Commons volunteers. Work has included clearing vegetation, providing new access steps, stabilising one of the ramparts and establishing new vegetation for the long term protection of its banks.

[2.169-2.181.](#) The project has been celebrated through guided walks and involvement of the local primary school, learning about the monument and sowing grass seed on the ramparts to help protect them for the future. The partnership hopes to establish a volunteer archaeological monitoring scheme for ongoing conservation work.



Woodbury Castle restoration project 2017- 2018, Woodbury Common.

Neighbourhood Planning

2.170-2.182. The Localism Act (2011) introduced Neighbourhood Planning, which gave local communities greater powers to make decisions about their area through a Neighbourhood Plan. There is much guidance available through Historic England on how to gather information on, and capture heritage within a plan. Both the Council’s Planning Department and Historic England can advise on the stages of development of a neighbourhood plan.

2.174-2.183. At the time of writing, 42 neighbourhood areas are designated in East Devon, which represent a large number of plans for a non - unitary Local Authority nationally. Twenty seven of these have been ‘made’ (legally approved).

2.172-2.184. Within neighbourhood plans, policies can be developed relating to heritage. Made neighbourhood plans for Lypstone and Chardstock, for example, have policies relating to new development and their setting in relation to heritage issues. It is important, however, for any evidence provided to be proportionate to the scale of the neighbourhood plan.

2.173-2.185. Neighbourhood Plans can also include policies which identify and/or give additional protection to non-designated heritage assets. Recognising the importance of local community knowledge, several of the actions in this Strategy commit to producing and helping to implement guidance at a local level- Parish Councils and Neighbourhood Plan groups are ideally placed to identify local heritage assets and ensure that their importance is recognised.

2.174-2.186. Some Neighbourhood Plans will also allocate sites for development and it is essential that local heritage assets, and their setting, are properly taken into account in this process. Early conversations with the Council’s Neighbourhood Planning Officer and Historic England can help to raise the awareness of sensitivities regarding heritage assets and guidance will be produced to assist in identifying, and taking account of, the significance of heritage assets when allocating sites for housing development. [Devon County Councils Historic Environment Team are also actively supporting Neighbourhood Plan groups, providing Historic Environment Record information, guidance and commenting on draft plans.](#)

Proposed Action:

- *Explore reintroducing a Member Champion for Building Design and Heritage*
- *Continue to offer support to neighbourhood planning groups in identifying heritage assests, assessing significance and writing policies*
- *Produce a template to guide neighbourhood planning groups in site assessments to ensure that heritage matters are appropriately considered*

Training and capacity building

2-175-2.187. There are many sources of information available and training for groups and individuals to participate in managing their local heritage. Publications such as '[The Building in Context Toolkit](#)~~Knowing your place~~', 'Placecheck' and 'Understanding [Historic Places](#)' provide useful guidance from Historic England, whilst the Oxford Toolkit is a recommended guide on how to undertake a conservation area character appraisal. A Smartphone App 'Rate My View' is currently available for communities to record local points of interest. Devon County Council's Historic Environment Viewer and Heritage Gateway provide much information.

2-176-2.188. A resource is also available through the Devon Rural Archive (Significance of Place)⁵¹ website for communities engaged in Neighbourhood Plans, Conservation Area Appraisals and Management plans, providing guidance and workshops on heritage related matters.

2-177-2.189. Capacity building, where residents' knowledge and skills in heritage issues are developed through workshops, which may include their training of other residents, can be developed within communities creating a valuable resource of knowledge and expertise.

Proposed Action:

- *Facilitate, or advise on, a range of training opportunities, especially for neighbourhood planning and other community groups with an interest in heritage*

Working in partnership

2-178-2.190. Working in partnership and co-operating with other public bodies, organisations and agencies within and adjacent to the district means that approaches and work programmes can be co-ordinated where possible, and benefits can be maximised. Partners within the economic and tourism sector, for example, combine to regenerate areas and draw visitors and businesses to our towns and seaside resorts.

2-179-2.191. In the environmental sector partnerships such as those with the two National Landscapes help us to understand, protect and enhance our outstanding landscapes. For example, the East Devon National Landscape has produced an action plan based on Historic Landscape Characterisation carried out across East Devon.

2-180-2.192. The District Council also works in partnership with Devon County Council to fulfil its obligations to have access to Historic Environmental Records and specialist archaeological and non-designated heritage asset planning advice.

2-181-2.193. Corporate working between Council departments including economic development, environmental health, housing and planning are also important where possible, to help work towards common objectives and overarching priorities. Working with partners and other departments within the Council can help to identify where joint projects

⁵¹ <http://www.devonruralarchive.com/Significance-of-Place.html>

may be progressed or bids for funding may be pursued, for example in our historic town centres or areas targeted for regeneration.

Proposed Actions:

- *Increase attendance at meetings or events with partner organisations to work towards common goals*
- *Create working group within the Council to work towards joint objectives and coordinate projects and programmes*
- *Work with partners and other departments to identify joint projects and sources of funding*

Regeneration

2-182-2.194. Heritage can provide the impetus for regeneration projects, especially where redundant historic Brownfield sites have proved not viable to bring back into use by a private owner due to the additional costs of specialist work. Empty or derelict buildings can have a negative effect on an area. Research has demonstrated the added value of bringing historic buildings into a good state of repair and into use, restoring confidence and attracting further investment. Solutions may need to be creative or innovative in terms of partnerships and sources of funding in order to tackle difficult sites.

Economic Development department

2-183-2.195. Working with this department we can help to identify heritage-led regeneration projects that will have social, economic and environmental benefits through, for example, improving tourist and town centre sites that are run down. Heritage has an important role to play in place-making and this may be part of a much wider programme working with other partners in the public and private sector. [The Economic Development Strategy⁵² looks at the wider benefits to local communities and businesses where Heritage projects can play a part.](#)

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Environmental Health department and private sector housing

2-184-2.196. Working with our private sector housing team can help to identify joint projects where heritage assets are in a poor state of repair. Owners may be encouraged to improve their properties through grant funding, loans or advice, or properties may be subject to enforcement action (as described in Theme B).

2-185-2.197. Listed buildings may become neglected and empty due to the cost of repairs. Owners can be encouraged to bring properties into use through empty homes loans at a beneficial rate, or where the owner may not be able to get a loan otherwise.

2-186-2.198. Private sector house renovation schemes can be a vital part of a wider programme of regeneration, especially in our town centres. For example, funding may be available for 'Living over the Shops' schemes where empty residential or commercial space is converted into living accommodation in our high streets and town centres. Not only can such schemes improve the appearance of an area, encouraging owners and businesses to

⁵² [economic-development-strategy-2024-29-cabinet-final.pdf](#)

invest, but can house and bring in more residents, who are likely to shop locally. Many sustainable outcomes can be achieved through this. For example, with less car use carbon emissions are reduced bringing environmental benefits, health may be improved as walking is encouraged to local shops, bringing social benefits, whilst retailers may have increased local trade bringing benefits to the local economy.

Example: Honiton High Street

2-187-2.199. A group of flats above commercial buildings within the conservation area were recently upgraded with the Council working with the fire service to improve safety issues, which will help to keep the buildings occupied and encourage the benefits explored above.

Area Regeneration

2-188-2.200. The historic environment can be a powerful tool for delivering regeneration and providing spaces for local businesses, community facilities and other activities. Co-ordinated programmes for improvement can influence a much wider area as existing property owners tend to spend more on maintenance, whilst new investors move in.



Example: Otter Mill, Switchgear factory (left) and site (right), Ottery St Mary in 2013 and 2022

2-189-2.201. The regeneration of the listed Town Mill, Mill House and Corn Mill buildings have greatly improved the sustainability of the area. This Brownfield site was neglected for many years and was an eyesore at the entrance to the town centre and Conservation Area. The provision of housing has helped to sustain local shops and add to town centre vitality. Its proximity to schools, shops and other major services encourages walking and cycling, contributing to the health and wellbeing of the community whilst reducing carbon emissions. The restoration of these Listed Buildings has improved the local environment and helped the town to become a more attractive location for local businesses and visitors.

Example: Seaton seafront

2-190-2.202. The World Heritage Coast and an adjacent conservation area combine to make a valuable resource for retail, tourism and day visitors. Seaton town centre and seafront have

been targeted for improvement over many years, including a partnership between Devon County Council and the District Council to improve the appearance of the town centre and raise the quality of shop front development. Practice notes were adopted as supplementary planning guidance in 2002 and have been used to determine planning applications in the Conservation Area.

2.194-2.203. The renovation of individual sites which may have been an eyesore can also make a huge impact on an area, its heritage, sustainability and local economy, by encouraging investment in a location previously unattractive and subject to uncertainty.



Seaton conservation area shop fronts and adjacent seafront

Town centres and high streets

2.192-2.204. The use of town centres is important for local communities - residents, businesses, and retailers as well as for visitors, providing a focus for social and communal activities. Historic buildings, streets and spaces can provide an attractive setting and a local identity to these places, contributing to their overall success. Historic England reports⁵³ on how the role of town centres and high streets are changing due to economic, social, demographic and technological trends, which in turn have often had an effect on the local historic character.

2.193-2.205. Research has revealed a decline in the retail performance in town centres, along with the shift of large retailers away from town centres during the last 20 years. Replacing this is a trend towards leisure, food and drink, with a focus on quality and experience, and the growth of many restaurant groups and fashion retailers. Meanwhile, banks and post offices are closing leaving many prominent and listed buildings with the need for a new use. Emerging successful independent retailers are important for the vitality of town centres.

2.194-2.206. During the last decade, limited public sector funding combined with a lack of economic viability has been a consistent trend. With a lack of investment, the historic environment will suffer along with economic vitality, so the sensitive development of new shops is very important. Many smaller scale solutions are emerging, often in smaller centres where there is an understanding of the need to enhance local distinctiveness and a willingness to adapt to new challenges.

⁵³Historic England (2013) The Changing Face of the High Street: Decline and Revival

~~2.195-2.207.~~ The publication 'The Changing Face of the High Street' (2013) looks at how local councils, developers and partnerships have sought to improve the vitality of these centres and the public realm by embracing their local heritage.

~~2.196-2.208.~~ [Although no East Devon towns were included in the project, Historic England's 'High Streets Heritage Action Zones'⁵⁴ \(running from 2020-2024\) is a recent example of the power of community engagement, cultural events and smart reuse of derelict and heritage assets to boost the economy and vitality of our high streets.](#)

~~2.197-2.209.~~ Cost effective ways of improving town centres include marketing and branding exercises, 'way-finding' and signage schemes, pop up shops, events and street markets. Meanwhile, joint initiatives involving empty properties, including 'Living Over The Shop' schemes or shop front improvement can help to invigorate run down centres.

Branding and Competitiveness

~~2.198-2.210.~~ Place branding can help to build the reputation of a place and improve the perception of residents, businesses, investors, workers and visitors. The role of heritage is important in building a brand that reflects local identity and a sense of place and it is estimated that the role of heritage in place making and place branding will grow. Place branding studies⁵⁵ have revealed that the main resources are heritage assets which help to differentiate places, provide an authenticity which has a wide appeal and can extend visitors 'dwell time'.

The historic town centres of East Devon

~~2.211.~~ In East Devon, the town Centres of Ottery St Mary, Honiton, Budleigh Salterton, Axminster and Seaton are mainly or largely within a conservation area, making these attractive places for visitors. Some, such as Budleigh Salterton, are preserved more than others, while others such as Ottery St Mary are subject to more growth giving them very different identities and priorities for their future.

~~2.199-2.212.~~ [The towns of Exmouth, Honiton and Seaton have had Historic England/Devon County Council historic character surveys carried out between 2012 and 2016 as part of the Devon Historic Market & Coastal Towns survey.⁵⁶](#)

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More information and maps on each historic town centre are in provided Appendix 1

⁵⁴ [Regenerating Historic High Streets through Heritage Action Zones | Historic England](#)

⁵⁵ Historic England (2017), Heritage Counts 2024

⁵⁶ [Extensive Urban Survey - Devon: Introduction](#)



Examples of Historic town centres: Honiton, Seaton and Axminster

Sources of Funding

2.200-2.213. The Heritage Funding Directory currently provides comprehensive details of a range of support that may be available for heritage interests through grants, loans, awards, education and training, and “in kind” resources. These are from central government, local authorities, agencies, EU and non-governmental bodies, trusts and corporate or private interests. Some of these organisations and types of funding are outlined below.

Historic England

2.204-2.214. The organisation provides grants for heritage assets at risk, though due to high demand, limited qualifying projects can be funded. A condition may be applied that offers public access to a grant aided site for a number of years. Repairs grants may be offered, mainly for urgent repairs to prevent loss or damage to important architectural, historic, landscape and archaeological features.

2.202-2.215. Grants for the repair and conservation of War Memorials may be available through the War Memorials Trust, whilst Historic England may offer funding to improve the management of field monuments through agreements with landowners or tenants.

2.203-2.216. The 'heritage protection commission's programme' may grant aid projects to develop innovative ways to protect the environment from harm and enrich skills and expertise to help care for it. The 'capacity building programme' provides funding for projects which promote the conservation, understanding and enjoyment of the historic environment.

Heritage Lottery Fund

2.204-2.217. A share of funds raised through the National Lottery is available through the National Heritage Memorial fund (HLF) for a wide variety of heritage themed projects, including training in heritage skills and the restoration of historic buildings and monuments.

Local Authority

2.205-2.218. The Council may have resources available for empty homes through loans to bring them into repair and back into use.

Central Government

2.206-2.219. Energy schemes administered by the government are available from time to time with loans towards items such as draft proofing or insulating a property.

DEFRA⁵⁷

2.207-2.220. The Blackdown Hills and East Devon National Landscapes have secured funding from this organisation through the Sustainable Development Fund. This is aimed at supporting projects that bring social, environmental or economic benefits to the areas and demonstrate innovation and good practice, including training communities in heritage.

2.221. [Other potential sources of funding through DEFRA include the environmental stewardship schemes, natures recovery schemes and woodland grants, as these can all contain heritage components.](#)

Arts Council England

2.208-2.222. [Arts Council England are the national development agency for museums in England. Arts Council England champion, develop and invest public money from the government and the National Lottery to help develop museums for as many people as possible across the country.](#)

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⁵⁷ Department for Environment, Food and Rural Affairs

Theme C Summary

- *The interlinked benefits of heritage can be social, economic and environmental*
- *Climate change mitigation measures require particular care and sensitivity*
- *Tourism and visitors to heritage sites contribute to our economy*
- *Co-ordinated policies can help to enhance our heritage*
- *Communities can be involved in heritage in many beneficial ways*
- *Partnerships can help effective regeneration*
- *Distinctive historic town centres attract visitors and business*
- *There are many sources of funding, detailed in the Heritage Funding Directory, for heritage related projects*

Objectives and actions

1 Work with partners and corporately to identify joint projects and maximise funding. Actions:

- *Explore reintroducing a Member Champion role for Building Design and Heritage*
- *Increase attendance at meetings or events with partner organisations*
- *Create a working group within the Council to work towards joint objectives and co-ordinate projects and programmes*
- *Work with partners and other departments to identify joint projects and sources of funding*

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2 Work with communities. Actions:

- *Facilitate, or advise on, training opportunities, especially for community and neighbourhood planning groups with an interest in heritage*
- *Continue to support neighbourhood planning groups in identifying heritage assets, assessing significance and writing policies*
- *Produce a template to guide neighbourhood planning groups in site assessments to ensure that heritage matters are appropriately considered.*

Section 3: Implementation



Colyton Conservation Area, from the Grade I listed Parish Church of St Andrew

Introduction

- 3.1. The strategy is proposed to cover an 18 year period (2024 – 2042) to run alongside the East Devon Local Plan 2020 – 2042. An action plan is provided for implementation of the strategy.
- 3.2. Through the three themes of the strategy, objectives have been identified and proposed actions to meet those objectives are highlighted in red. The themes, objectives and actions form the basis of the action plan, and each theme is colour coded in yellow, blue or green. For each action an estimate is made of the resources needed, its timing and its priority (whether it is a statutory duty).
- 3.3. As the second heritage strategy for East Devon, many of the actions relate to delivering the systems and programmes already established under the original strategy. A review of the strategy is proposed after the first five years. Resources and benefits are also outlined below.

Resources

- 3.4. The actions recommended have been carefully considered and our statutory duties are the main priority. Other actions are expected to produce significant beneficial outcomes in the future, whilst minimising resources in the long term. Projects and programmes will be suitably progressed according to available resources.
- 3.5. In order to minimise the demand on resources, the Council has identified some specific tasks that staff within the planning policy section may perform to help manage our heritage assets, with a 'light touch' sign-off by conservation officers.
- 3.6. The participation of the community in helping to deliver parts of the strategy will also provide a valuable resource, contributing to its progress. The impetus of local volunteers in Neighbourhood Planning and specialist historic interest groups may be captured and taken forward for this strategy.
- 3.7. The investment of staff time facilitating and advising on training will be needed especially in the early stages, but as the programme develops, capacity should build within local communities to help manage their own assets. Training is currently available for some projects and the Council is aiming to secure grant funding to support further work.
- 3.8. Cost effective ways of improving knowledge and engagement include circulation of the strategy in an accessible format and the provision of a more comprehensive website resource. New web pages can provide a base for the exchange of information and links to other organisations, guides and training in heritage issues.
- 3.9. An occasional heritage themed event at the Council offices and officer presence at other events are achievable ways of networking and promoting the heritage of East Devon. Local and regional organisations have offered their support for the strategy and these partnerships can be further developed to pool resources and deliver some common objectives in a cost effective way.

Benefits

- 3.10. The benefits that can be sustained or enhanced through delivery of the strategy are wide ranging, and are explored through the three themes.

- 3.11. Theme A aims to improve knowledge and understanding of the heritage of East Devon by making information accessible to a wide audience and by promoting its value. Benefits include increased awareness and appreciation of our heritage, active participation in heritage programmes and a feeling of identity and pride in local areas.
- 3.12. Theme B explores how we can manage our heritage assets through Conservation Area review, monitoring buildings and risk and local listing, all of which help to conserve our heritage. The strategy aims to increase community involvement in programmes, building on the strong neighbourhood planning groups and historic societies in East Devon. This will in turn increase the range of skills, knowledge and experience to help conserve our heritage.
- 3.13. Historic England reports on growing evidence of a positive relationship between heritage participation, wellbeing and quality of life⁵⁸. This includes findings that both visiting and volunteering in heritage brings happiness. Heritage participation helps to develop connections between people and groups in local areas, whilst building skills and personal development. All of these can contribute to improved mental and physical health.
- 3.14. For organisations, programmes involving the community encourage innovative ways of working, demonstrate public accountability and strengthen links with the community.
- 3.15. Theme C looks at how heritage can boost the economy through tourism and the attraction of our historic town centres, both directly, through the employment of specialised craftsmen and use of local materials, and indirectly through increased appeal for tourists, businesses and residents.
- 3.16. Visitors to heritage-related tourism generate considerable income for the local economy, helping local enterprise. Further, heritage often plays a central role in the regeneration of towns, with both people and businesses being attracted to characterful places.
- 3.17. Environmentally, the positive conservation of our heritage assets helps to reinforce local distinctiveness and encourage high quality design.

Monitoring

- 3.18. The monitoring of actions will be developed further where measurable targets are possible. Some indicators are already included in the local plan and others are collected by Historic England. In the long term the impact of projects delivered through the strategy can be assessed to inform the future planning of programmes.
- 3.19. Benefits may be measured through a range of surveys, questionnaires and interviews. The impact of community programmes may also be assessed using a matrix to explore the value of what has changed, and to what extent, against other programmes.

⁵⁸ Historic England (2024), Heritage counts 2024

Action Plan 2024 – 2042

Timescales: S = Short term 2024 – 2027 M = Medium term 2028 – 2035 L = Long term 2036 – 2042

Objectives Theme A	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale			Notes	Indicative monitoring
					S	M	L		
Enhance understanding of heritage assets and their significance	Provide information and Guidance through an updated Heritage Strategy		Moderate staff resources	Policy team	X				
	Provide links to further guidance through the Council's website		Minimal staff resources	Policy and conservation staff	X	X		Ongoing	
	Continue to develop and improve web pages on the Council's website for the provision and exchange of information on heritage issues relevant to East Devon		Moderate staff resources with ongoing updates	Regular updates from policy and conservation staff. Links to, and input from partners	X	X		Ongoing with regular updates	Survey on use of website and other programmes
Widen knowledge of the heritage of East Devon and its assets	Encourage local groups / museums to engage with local schools		Moderate staff resources	Policy staff to circulate information, Help from partner organisations such as DCC HE Team		X			
	Promote strategy and web pages including use of social media		Moderate staff resources	East Devon staff, press office and Members, Help from partner organisations such as DCC HE Team	X	X		Ongoing	No. of local groups / partners engaged
Celebrate and promote the heritage of East Devon (raise the profile)	Support and develop a calendar of local heritage events and anniversaries such as the annual Heritage Open Days and the East Devon National Landscape Heritage Conference. Promote heritage strategy and website at heritage events.		Moderate staff resources	Staff and Lead Councillor for Heritage presence at heritage events, Help from partner organisations such as DCC HE Team	X	X	X	Ongoing	Number of events attended; outcomes recorded
	Host an occasional heritage themed event / workshop for members and community representatives- this may be provided as part of wider Neighbourhood Planning events		Use of Council chamber and catering	East Devon staff, Members and Community Officer. Help from partner organisations	X	X			Event feedback survey

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<u>To integrate environmental and heritage enhancement</u>	<u>Promote the inclusion of biodiversity considerations, nature recovery and ecological enhancement in heritage management.</u>		<u>Moderate staff resources</u>	<u>Policy, DM and Conservation Teams within the council, work with partners to deliver across the district.</u>	X	X			
	<u>Conserve, enhance and integrate biodiversity and ecological networks within heritage assets and their settings where appropriate, through informed management and guidance</u>		<u>Moderate staff resources</u>	<u>Policy, DM and Conservation Teams within the council, work with partners to deliver across the district.</u>		X	X		

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Objectives Theme B	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale			Notes	Indicative monitoring
					S	M	L		
Positively manage the heritage assets of East Devon: Conservation Areas	Undertake a programme of Conservation Area review:	Yes							
	Deliver programme of Conservation Area review and management plans.		Staff resources, policy team.	Conservation team	X			Ongoing	Completion of guidance
	Implement the process for communities to help deliver reviews, including training and monitoring.		Staff resources, policy team	Policy/NP officer, in consultation with conservation team and local amenity group.	X	X			Process developed
	Implement programme to prioritise reviews over 18 years. Consider priorities in Conservation Areas within towns and other Settlement Boundaries most subject to change and those with active Neighbourhood Planning and Historic Interest Groups. Undertake the programme of reviews, to include full and interim reviews and other methods where appropriate, some involving neighbourhood planning and local history / amenity groups. Prepare appraisals and management plans.		Staff resources, policy and conservation team. Much input from community and staff initially	Programme managed by policy staff working with communities with input and sign-off by conservation team. Assistance from partners, especially if able to secure funding for training.	X	X		Long term protection of assets and benefits for the community.	Numbers of reviews and management plans. Other Indicators developed for pilot scheme

Objectives Theme B	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale			Notes	Indicative monitoring
					S	M	L		
Conservation Areas	Determine if any parts of the district merit designation as a Conservation Area and if so designate new areas:	Yes							
	Conduct regular review of areas that may merit designation		Staff resources	Annual review by staff	X	X	X		
Heritage at Risk	Provide information and a link to the Historic England register of heritage assets at risk on the Council webpage	Yes	Minimal staff input complete and update	Information supplied by Historic England	X	X		Minimal input with annual updates	
	Liaise with partners and organisations including Building Control, Estate Agents and communities to enable reporting on assets at risk where possible and start a list.		Staff resources, to provide information on website	Policy staff to facilitate in consultation with conservation team		X		Awareness of assets at risk can help to inform programmes and focus action.	Numbers of heritage assets at risk, numbers reported, surveyed or monitored
Local List	Establish a local list of non-designated assets:	No							
	Continue to publicise the Local List Guide for East Devon, which advises on procedures and guidance on selection criteria		Policy officer		X			Ongoing	
	Continue to receive submissions from communities and historic interest groups.		Policy team	Submissions from town or parish councils, ward members, neighbourhood planning groups and local amenity groups. Partners such as DCC HE Team	X			Ongoing subject to available resources	Number of groups submitting items consideration
	Work with the Devon Gardens Trust to adopt assets from their Local List of Parks and Gardens of Historic Interest into the East Devon Local List of Undesignated Assets.		Conservation Team and Policy Team	Submissions from the Devon Gardens Trust	X			Ongoing – awaiting submissions to assess	Number of assets added to the Local List from the Devon

								Gardens Trust List	
Objectives Theme B	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale S M L			Notes	Indicative monitoring
Local List	Continue to assess, record and publish a list of non-designated heritage assets		Policy staff resources	Policy officer in consultation with conservation team	X				
Encourage development which enhances distinctiveness	Provide links to further guidance which address the most common issues, on website, much from Historic England.		Minimal staff resources to provide links on webpages	Policy officer in consultation with conservation team		X			Feedback survey on information provided
	Provide information on the website on sourcing of local materials, in particular a stone quarry guide		Moderate staff resources	Conservation and policy team, available through new webpages		X			Completion of guides, number of guides requested; feedback
	Update and publish shopfront and any other relevant guides relating to heritage		Moderate staff resources	Conservation and policy team, available through new webpages		X			Completion of guides, no. requested; feedback
Objectives Theme C	Actions and tasks	Stat. duty	Indicative resources	Delivery: Staff and Partners	Timescale S M L			Notes	Indicative monitoring
Work with partners and corporately to identify joint projects and	Increase attendance at meetings or events with partner organisations to work towards common goals		Staff resources, potential to pool resources with partners for maximum benefit	Policy and/or conservation officer working with external partners such as the East Devon and Blackdown Hills National Landscapes	X	X	X	Ongoing	Meetings attended, outcomes recorded

maximise funding	Create Council working group to work towards joint objectives and co-ordinate projects and programmes. Provide website links to regeneration, economy and tourism sectors.		Moderate staff resources	Policy and conservation team staff working with other sections such as private sector housing, building control and regeneration.		X		Set up regular meetings and continue according to outcomes	Meetings attended, outcomes recorded
	Work with others to identify projects and sources of funding		Potential to attract grant funding for heritage projects or programmes, especially those involving the community	Policy staff working with external partners and EDDC departments	X	X	X		Projects and funds identified
Work with communities	Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage.		Moderate staff resources to develop training opportunities for pilot scheme. Capacity building within community can provide a valuable long term resource of trained residents.	Policy staff working with external partners and local community groups.	X	X			Criteria to be developed, along with pilot scheme
	Produce a template to guide neighbourhood planning groups in site assessments in relation to heritage		Minimal staff resources	Policy staff	X				

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Section 4: Appendices



Whimple conservation area

Appendix 1: The historic town centres of East Devon

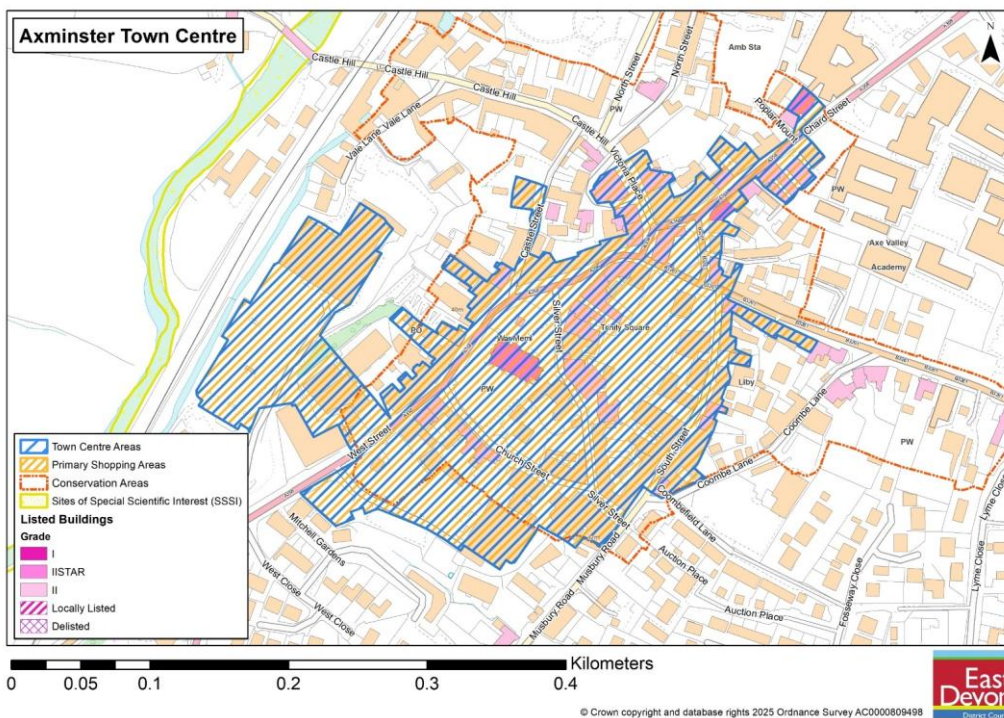
Axminster

Axminster has a long and rich history from its origins as a Roman roadside town, then Saxon, Royal and ecclesiastical centre reflected in its character, and is noted for its textiles and carpet manufacture which started in the mid-18th century.

Most of the town centre is within the conservation area. Growth is proposed with town centre regeneration and improvements to access with provision of a new road to relieve traffic pressure on the historic town centre.

The vision for Axminster in the Local Plan is to conserve and enhance the fine built heritage of the town and surrounding countryside. There are good levels of food retail shopping but low levels of non-food retail which will be encouraged. Growth should support the range of independent shops in the town centre.

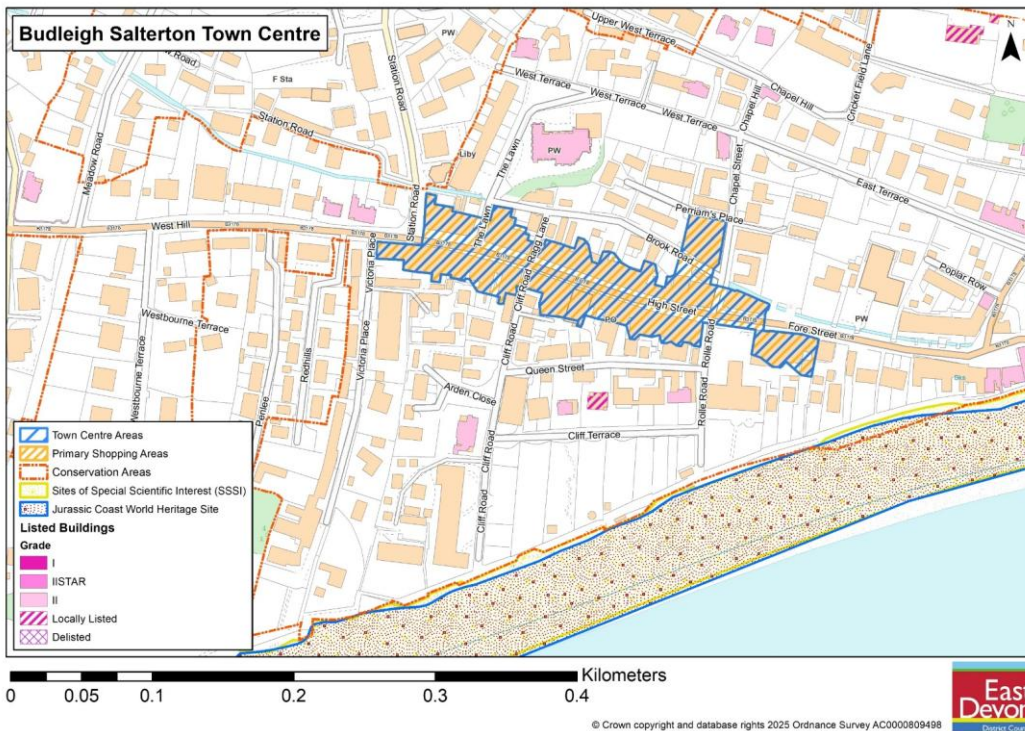
The local plan expects that developments within the town centre, will enhance the townscape quality, reinforce its independent market town character and so contribute to a sense of place.



Budleigh Salterton

The town has a large conservation area which encompasses all of the town centre as well as a long stretch of the promenade at the seafront. It is the only town in East Devon which is completely within a National Landscape. The whole beach and adjoining coastline form part of the World Heritage Site and the town acts as a 'gateway entrance' to the site. The Otter estuary to the east is a Site of Special Scientific Interest. It is also known for "its rich and varied domestic architecture and absence of usual seaside commercialism"⁵⁹. As a result, there are strict constraints on development within and adjoining the town.

The town centre contains many important building groups and stretches of unspoilt frontages within the conservation area (adopted in 2007). The town, which originated as a fishing hamlet particularly flourished between the early 19 and 20th centuries and contains many attractive houses of the late Georgian and Regency period, as well as houses inspired by the Arts and Crafts movement.



⁵⁹ EDDC Conservation Area Appraisal (2007)

Colyton

Also known as “the most rebellious town in Devon” due to its links with the Monmouth Rebellions of 1685. Colyton is a small market town with Saxon origins and a history dating back to the 8th Century. Being a local centre, the town features a range of facilities including pubs, shops, cafes and a library, many within the town centre area that is located completely within the conservation area.

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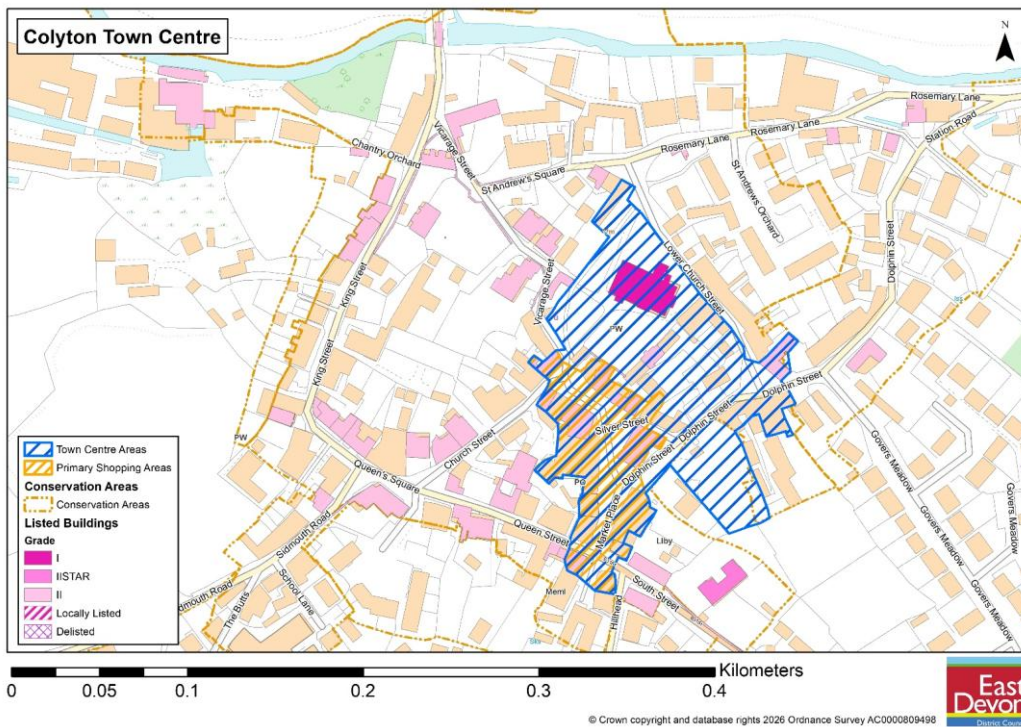
The town has a range of richly detailed historic buildings, including the medieval church with lantern tower and a number of good 16th and 17th century houses, and a tightly knit built form with local and vernacular materials that has been largely undisturbed by 20th century developments⁶⁰.

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The local plan has is supportive of some development at Colyton that meets the needs of the immediate surroundings, whilst conserving and enhancing the quality of the historic built form. The nearby Beer Quarry Cave SAC will be protected, along with bat pinch points and semi-natural landscape between Colyford and Colyton



⁶⁰ EDDC Colyton Interim Conservation Area Review

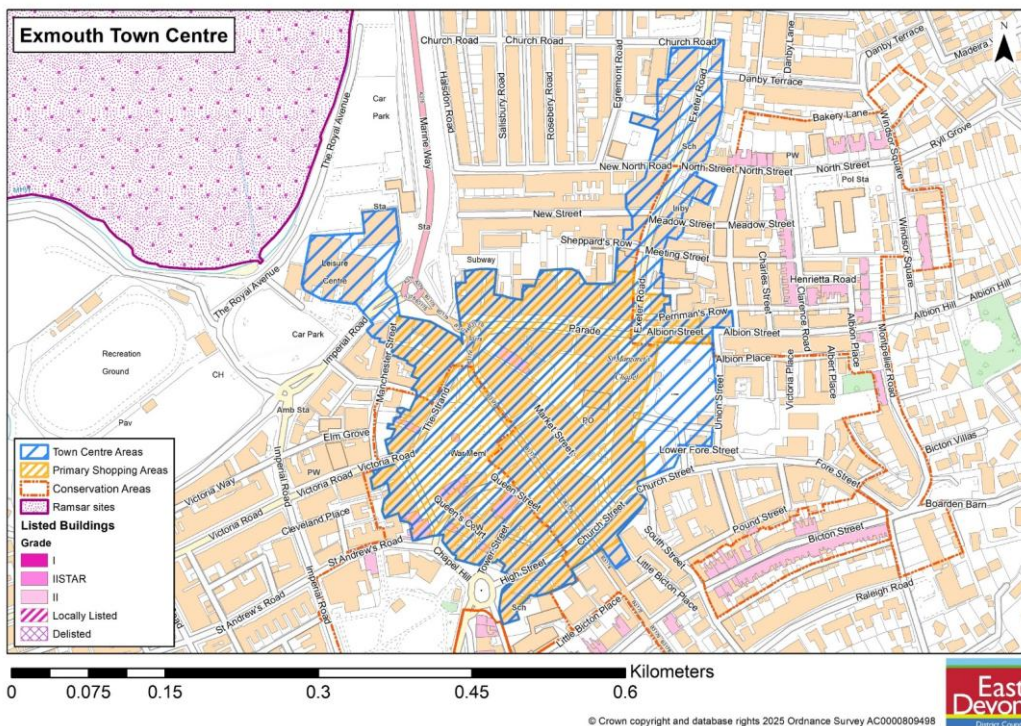
Exmouth

Only a small proportion of Exmouth town centre is within a conservation area, mainly the eastern side of Exeter Road on the outer fringe of the town centre. However conservation areas adjacent to the south and east borders of the centre include many terraces of listed buildings, mainly residential.

There is a focus on town centre enhancement, this area is close to the sea and estuary which are the main tourist areas. This includes an uninterrupted terrace of fine properties from the late 18th and early 19th centuries with sea views. At the nearby seafront, terraces of stuccoed buildings from the late 19th also contribute to the character of Exmouth.

Nearby, the Exe Estuary is a ‘Ramsar’ site while the World Heritage Site coastline begins further east beyond the promenade.

An Extensive Urban Survey project has been completed for Exmouth, recording the history, archaeological potential and historic character of the modern town. This is available online via the Devon County Council Historic Environment webpages.

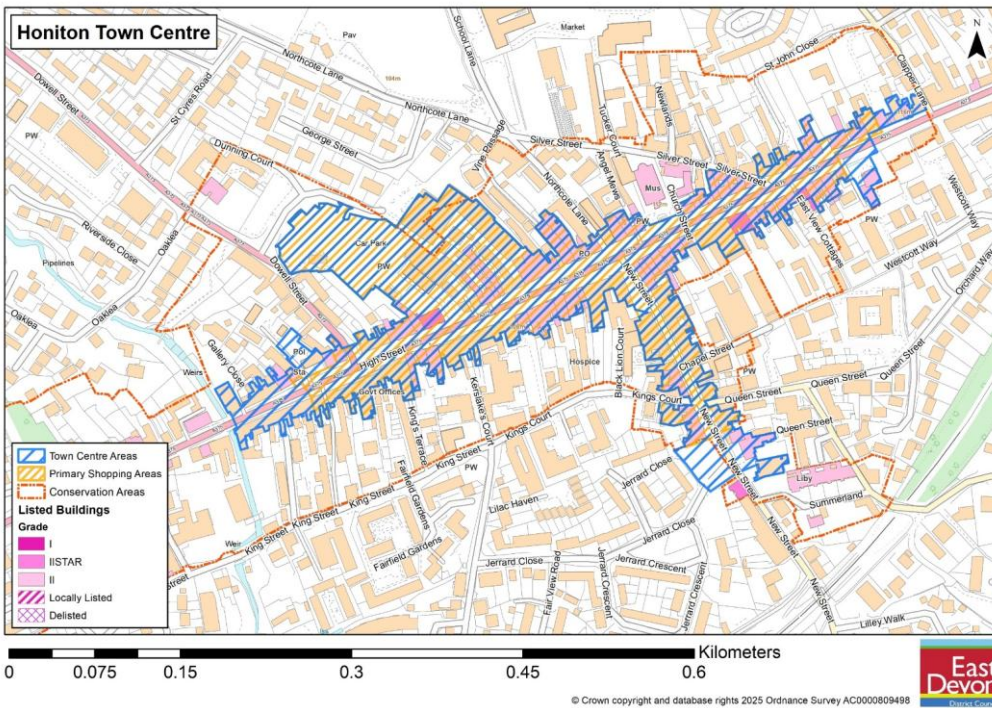


Honiton

The town centre of Honiton, mainly along one route, lies completely within a conservation area. This High Street is the former Exeter to Dorchester Road, and is flanked by listed buildings, mainly grade II but including some grade II*, and includes a concentration of heritage assets in the medieval planned town. A fire in the centre of the High Street led to many of the medieval cottages being replaced by Georgian houses although much of the burgage plot layout still survives. One of the town's main functions was as a coaching stop, and many large inns remain, although some no longer function as such.

Honiton is noted for its antique shops that attract visitors to the town, access is excellent with a direct link to the adjacent A30 and a railway station serving the Exeter to Waterloo line.

The local plan aims to enhance the environmental quality of the town centre as a major asset for visitors and resource for residents.

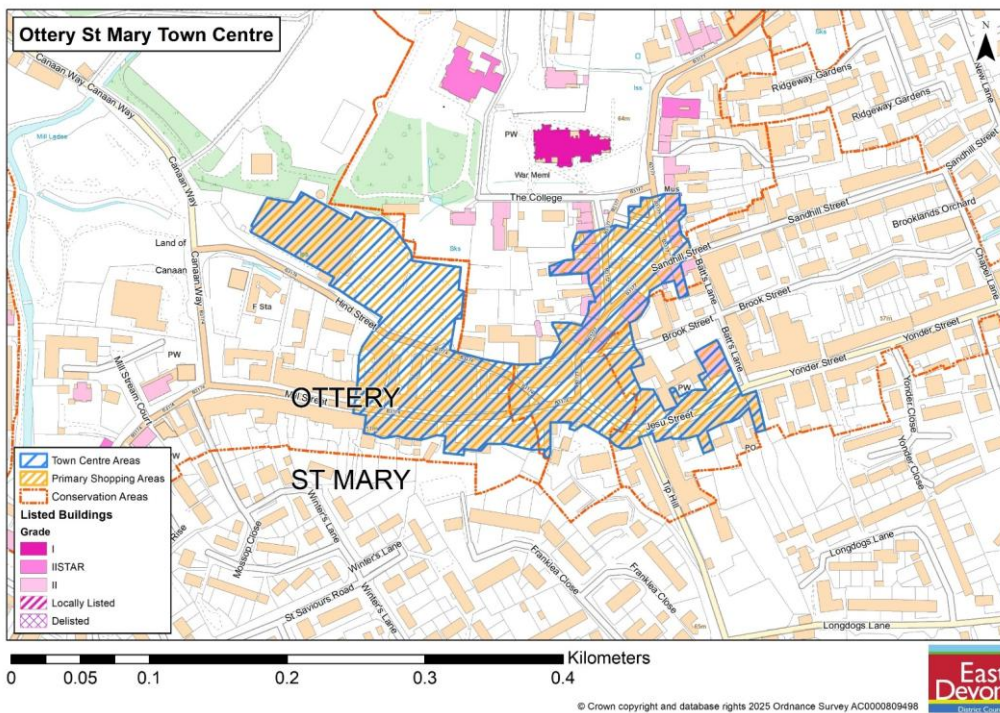


Ottery St Mary

The town is well known for its 'Tar Barrels' cultural event every November, which is believed to have originated in the 17th Century. It has a range of heritage assets where evidence from its early Saxon development, medieval town mill, parish church and collegiate, 18th century industrial development and 19th century literary greats can all be seen. It has a large conservation area, with an historic core of great architectural value within which lies the whole of the town centre including three rows of fine Georgian terraces and the Grade I St Mary's Parish Church.

The local plan has identified Ottery St Mary as a place for new homes and gives priority to the enhancement of the environment and the promotion of business opportunities in the town centre area. Development is focussed on making the town a more vibrant area and the town centre more attractive for residents, businesses and visitors.

Close to the town centre a major regeneration project has centred on redevelopment of the listed 18th century flour mill and wool manufacturing unit. This has improved the setting of the main route into the town. Increased homes within the building and at nearby new developments will in turn help to enhance the viability of the town centre. Conserving the historic qualities of the town and especially the town centre, and promoting these as assets for residents and visitors to the town is a priority.



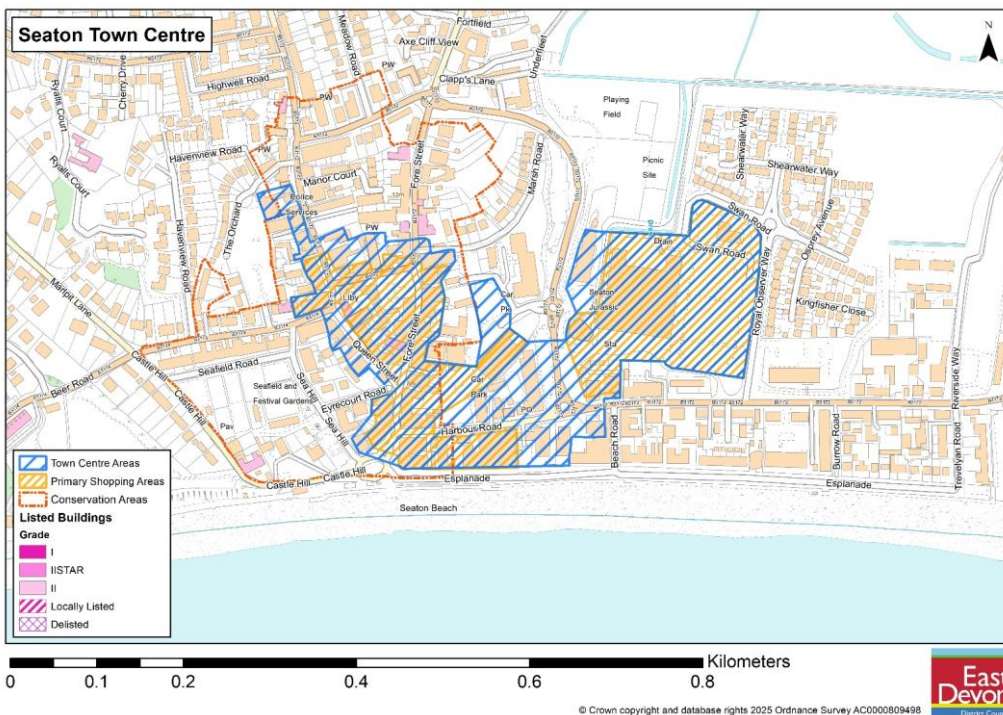
Seaton

The local plan recognises the importance of the Jurassic Coast world heritage site and exceptional surrounding coastline as assets integral to the future success of the town. The town is surrounded by a National Landscape and a number of [County Wildlife Sites](#).

The town centre contains distinct areas, the recent eastern half being dominated by a large supermarket, a central area which is a focus for regeneration and the western part of the site which lies almost entirely within a large conservation area. The southern part of this conservation area is adjacent to the beach and is a tourist site with distinctive street furniture celebrating the Jurassic Coast. To the west of the Conservation Area items of historic interest include a fine terrace of 19th Century three storey stucco villas.

The local plan emphasises the importance of conserving the natural environment and surrounding ancient heritage assets as well as traditional seaside heritage, including the esplanade and harbour to make the most of 'leisure, cultural and commercial opportunities'.

An Extensive Urban Survey project has been completed for Seaton, recording the history, archaeological potential and historic character of the modern town. This is available on-line via the DCC Historic Environment webpages.

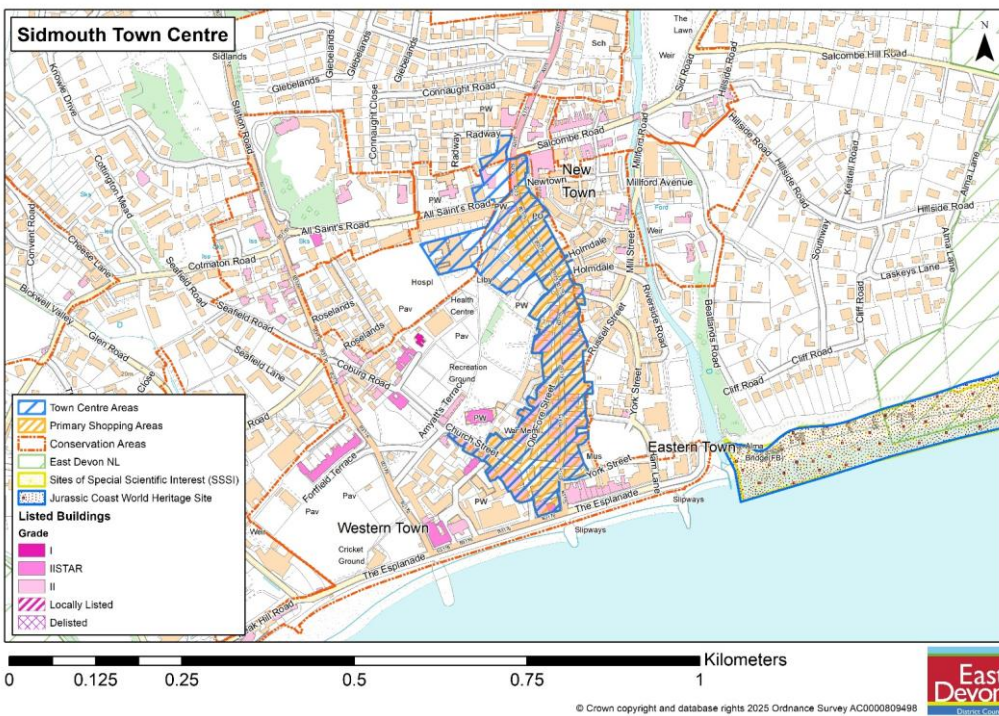


Sidmouth

The town centre is almost entirely within a conservation area. Many listed buildings line the primary retail frontage, making an attractive shopping area and tourist destination.

Sidmouth is nationally renowned as a fine Regency seaside town of exceptional charm, character and architectural value. Like Seaton, the town is flanked by the Jurassic Coast World Heritage Site to the east and west and surrounded by a National Landscape. There are also extensive National Trust areas in and around the town, adding to its interest for tourists and visitors.

Sidmouth is designated as a “Gateway Town” for the Jurassic Coast World Heritage Site. The town centre is vibrant commercially with many independent shops, bars and cafes and is an important focal point socially for both residents and visitors. The conservation, enhancement and sensitive management of Sidmouth’s heritage, and promotion of these assets, especially in the town centre and Seafont, should be continued.



Appendix 2: The Conservation Areas of East Devon

This appendix provides a very brief description of the Conservation Areas of the District but detailed information on Conservation Areas can be found in each appraisal on the East Devon District Council website.

Villages / small towns:

Beer and extension: this covers most of the village centre and is adjacent to World Heritage Site and National Landscape. Comprising 20.09 hectares.

Broadclyst: the conservation covers the centre of a larger village. The village is surrounded by National Trust land, which is also designated for more than 50% of the conservation area. Includes 2 complete rows of listed buildings and grade I place of worship. Comprising 9.56 hectares.

Broadhembury: this takes up most of the small village and is totally within a National Landscape. There are a large proportion of listed buildings including a Grade I place of worship and 4 grade II* buildings. Comprising 7.2 hectares.

Brampford Speke: On the western borders of East Devon to the north of Exeter, this small village is mainly within the conservation area. To the east and partly inside the conservation area is an SSSI, and to the south a county wildlife park. The conservation area has a good proportion of listed buildings including a Grade I and a Grade II*. Comprising 14.93 hectares.

Chardstock has a Grade II* listed place of worship and is totally within a National Landscape. Comprising 8.1 hectares.

Colyford: follows a linear pattern along the main route, the eastern end is flanked by an National Landscape and a county wildlife site to the southeast. Comprising 14.31 hectares.

~~**Colyton** and extension: occupying the northern section which is the centre of this small town. It has been extended especially to the north and contains part of a National Landscape. Some larger listed buildings within the original area include a Grade I Place of Worship. Comprising 20.23 hectares.~~

Compyne Rousdon: most of this conservation area, comprising 85.13 hectares, is also a Registered Park including Grade II* buildings. It is adjacent to the World Heritage Site, a Site of Special Scientific Interest and a Special Area of Protection. It is totally within a National Landscape.

Dunkeswell: the conservation area is centred on a cluster of farm buildings, cottages and a church.

East Budleigh: the conservation area covers the north western centre of this larger village, with terraces of listed buildings, a Grade II* and a Grade 1 place of worship. It is entirely within a National Landscape. Comprising 4.7 hectares.

Gittisham: is totally within a National Landscape, with a large proportion of listed buildings including a Grade I place of worship and a Grade II* building including a wall. Part of a registered park. Most of this small village is within the conservation area, of 4.7 hectares.

Kilmington: is the smallest conservation area, a large part is within a National Landscape and includes a Grade II* place of worship. Comprising 3.46 hectares.

Lympstone: the conservation area occupies the village centre and along the main route through the village to the river where the western boundary is adjacent to a special protection area, and just south of a National Trust site. There is a large proportion of listed buildings in this area including a Grade II* place of worship. Comprising 10.35 hectares.

Musbury: is totally within a National Landscape with many listed buildings and a Grade I place of worship; comprising 5.65 hectares

Otterton and extension: this is a large conservation area covering at least half of this larger village, mainly along the linear route through the village. It is totally within a National Landscape and has a good proportion of listed buildings, a terrace of workers cottages and a Grade II* place of worship. Comprising 13.98 hectares.

Salcombe Regis: is a very small village almost completely contained within the conservation area and completely within a National Landscape. There is a grade II* building. The south and south east boundaries of the conservation area are adjacent to a National Trust and a county wildlife site. The north of the area is dominated by a caravan site and farm. Comprising 6.82 hectares.

Sidbury and extension: this area covers about half of this medium sized village, is completely within a National Landscape and has a large proportion of listed buildings. It is overlooked by the prominent hill site of the Iron Age Sidbury Fort. Comprising 11.37 hectares.

Sowton: This small village close to junction 29 is almost entirely within the conservation area with a large proportion of listed buildings including a Grade I place of worship. 10.68 hectares.

Stockland: lies totally within a National Landscape, the conservation area covers most of this small village and includes a Grade I listed place of worship and a grade II* building (the reading room); comprising 8.12 hectares.

Whimble: One of the larger villages, the conservation area includes the village centre and main route, and a grade II* place of worship. Comprising 4.38 hectares

Woodbury: this is a large conservation area covering nearly half of this large village with a number of listed community buildings including the 2 pubs and primary school, a Grade I place of worship and a smaller row of grade II* buildings. Comprising 19.34 hectares.

Towns:

Axminster: the conservation area covers the town centre with a Grade II* church and many listed buildings along street frontage, comprising 10.58 hectares.

Budleigh Salterton: this is adjacent to the World Heritage Site, it contains all of the town centre, and is completely within a National Landscape, comprising 30.27 hectares.

[Colyton and extension: occupying the northern section which is the centre of this small town. It has been extended especially to the north and contains part of a National Landscape. Some larger listed buildings within the original area include a Grade I Place of Worship. Comprising 20.23 hectares.](#)

Exmouth areas 1 and 2: a residential esplanade towards the seafront includes a continuous terrace of late 18th and early 19th century properties and a Grade II* place of worship. Behind this a street of listed small terraced properties – the complete row on one side. Comprising 13.02 hectares.

Exmouth area 3: this is mainly a residential area, with Victorian terraces and villas but including part of the town centre and retail frontage. Comprising 6.75 hectares.

Honiton: includes most of town centre and all of the primary retail frontage, with a large number of listed buildings along the high street. This was a Roman road and includes 6 Grade II* listed buildings. Comprising 21.09 hectares.

Ottery St Mary and extension: see town centres, theme C; comprises 52 hectares.

Seaton: This includes part of town centre, retail area and all of primary frontage, see Theme C. Comprises 11.48 hectares.

Sidmouth: Bickwell Valley and extension, in the western part of the town. This is a residential area partly designated as a National Landscape and partly a National Trust site. Contains 4 listed building and comprises 27.27 hectares.

Sidmouth: Elysian Fields, including Grade II* listed church, this comprises 8.53 hectares

Sidmouth: Sidford The conservation area is to the northern part of Sidford, along two main routes and includes a complete terrace of listed buildings. It is just to the south of a National Landscape. Comprising 4.04 hectares.

Sidmouth: Sid Vale and extension: Comprises 20.59 hectares.

Sidmouth: Town centre see Theme C; includes all of the town centre and primary frontage and comprises 28.91 hectares.

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Appendix 3: Partners, local history organisations & museums

Partners

- East Devon National Landscape
- Blackdown Hills National Landscape
- Devon and Cornwall Police
- Devon County Council

[Devon Tourism Destination Marketing Organisations \(DMOs\)](#)

Historic England

[Jurassic Coast Trust](#) [Jurassic Coast WHS – Dorset Council and Devon County Council](#)

[Museum Development South West \(MDSW\)](#)

[National Churches Trust](#)

National Trust

[East Devon Neighbourhood Planning Groups & Parish Councils](#)

[Pebblebed Heaths Trust \(Clinton Devon Estates\)](#)

Local History Organisations

Axminster Historical Society

Axe Vale and District Conservation Society

Axe Valley Heritage Association

Branscombe Project

Broadclyst Local History Society

Chardstock Historical Record Group

Colyton Parish History Society

[Devon Archaeological Society](#)

[Devonshire Association](#)

Devon Gardens Trust and Devon Gazeteer

Devon Historic Buildings Trust

Devon Historic Churches Trust

Exmouth Civic Society

Exmouth Historical and Archaeological Society

Feniton History Group

Hawkchurch History Society

Honiton History Society

Lympstone History Society

Membury History Society

Newton Popleford Local History Group

Otter Valley Association

Ottery St. Mary Heritage Society

Sidmouth Local History Group

Sid Vale Association

The Devonshire Association

Whimble History Society

Woodbury Local History Society

East Devon Museums and Heritage Centres include:

Allhallows Museum, Honiton

Axminster Heritage Centre

Axe Valley Heritage Museum, Seaton

[Colyton Heritage Centre](#)

Dunkeswell Airfield Heritage Centre

Exmouth Museum

Fairlynch Museum, Budleigh Salterton

Sidmouth Museum

Upottery Airfield Heritage Centre

Whimble Heritage Centre

Appendix 4 Glossary of Terms

This glossary is intended to assist readers by explaining how specific terms have been applied in the context of this Heritage Strategy. The glossary does not provide a definitive legal definition of terms, and readers should refer to legislation and national planning guidance for a full picture.

Archaeology

The NPPF (dec 2024) notes that a heritage asset is of archaeological interest “*if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point*”. Historic England applies the term to built, buried, waterlogged and dispersed assets, whether designed or not, informed by the NPPF definition⁶¹.

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Built Historic Environment

As distinguished from natural landscape features, the built historic environment refers to man-made aspects of our surroundings. This can refer to a range of features including, but not limited to, buildings and structures, pathways, monuments and ruins, industrial and post-industrial landscapes etc.

Cultural Landscape

As defined by UNESCO, Cultural Landscapes represent a combination of both natural and built features, being illustrative of the evolution of human society and settlement over time under the influence of the physical constraints and/or opportunities presented by their natural environment and social, economic and cultural forces. Three types have been identified: landscapes designed or created by man, organically evolved landscapes, and finally associative cultural landscapes.⁶²

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Heritage

A heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest.

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⁶¹ Definition within paragraph 2 (p.1) of: HEAN 17 Planning and Archaeology

⁶² World Heritage Centre - Cultural Landscapes

Historic Environment

The historic environment results from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. The Historic Environment Record is a collection of information that provides the public with comprehensive and dynamic resources relating to the historic environment of East Devon.

Report to: Strategic Planning Committee

Date of Meeting 5 May 2026

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Self-build and custom housebuilding update and monitoring report for 2024-2025

Report summary:

Custom and Self-build (CSB) monitoring figures were last considered by the SPC on the 4 February 2025. That report set out the new method used by officers to 'count' the supply of self-build plots following the introduction of new legislation that took effect from the start of 2024. Using the new method, only plots that show clear evidence of being CSB (e.g. through identification as CSB on the application form, where the owner clearly has primary input into the house design, or where CIL Form 7 Part 1 has been submitted and the CIL exemption granted for CSB).

The monitoring report shows that we are meeting our minimum legal requirements in relation to the supply of plots to meet the demand shown on our CSB register. The supply of 18 plots in 2024 to 2025 is a modest increase over the figure of 15 in 2023 to 2024. However, the figure of 18 continues to fit with the trend of lower levels of supply noted in recent years. This, coupled with the very supportive national policy for CSB, suggest that we need to do more to deliver CSB opportunities.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee:

1. Endorse the draft monitoring report for use in planning decisions (both planning policy and development management) and agree its publication on the Council's website.
2. Note that during the latest monitoring period (31/10/24 to 30/10/25) 8 individuals were added to the self-build register (6 to part 1 and 2 to part 2) generating a need to permission 6 plots suitable for self-build between 31/10/25 and 30/10/28.
3. Note that the demand for self-build plots indicated on the register should be taken into account in our planning, housing, regeneration and estate functions.

Reason for recommendation:

To ensure that our obligations with regard to self-build and custom housebuilding are met in line with the relevant legislation and national planning policy context.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management, e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Communications and Democracy
- Economy
- Finance and Assets
- Strategic Planning
- Sustainable Homes and Communities
- Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk; Low

Links to background information Links to background documents are contained in the body of this report.

Link to [Council Plan](#)

Priorities (check which apply)

- A supported and engaged community
- Carbon neutrality and ecological recovery
- Resilient economy that supports local business
- Financially secure and improving quality of services

Report in full

1 Background to the self-build register

- 1.1 The Government is keen to encourage opportunities for people to build their own homes through custom and self-build (CSB). Some of the advantages of CSB are that it diversifies the supply of housing, gives individuals and groups the opportunity to tailor make their own home, can be cheaper than buying a 'standard' home from a house builder and can produce innovative designs with enhanced ecological credentials.
- 1.2 Since March 2016 we have kept a register of people who are interested in building their own home in East Devon. Since October 2017 we have had a duty to ensure that enough serviced plots are 'permissioned' to meet the demand shown on the register. We have produced CSB monitoring [reports](#) annually to show the latest demand and supply figures. There is a legal duty to consider the results in our planning, housing, regeneration and estate functions.
- 1.3 In April 2017 we introduced a local connection test so that, generally, only those who live or work in East Devon, are included on the part of the register that is used to gauge demand for the number of plots that need to be permissioned (Part 1). In February 2020 this Committee decided to keep the local connection test and not to introduce a financial solvency test or a registration fee. It is not considered that circumstances have changed that would justify reconsideration of these issues.

- 1.4 In addition to being relevant to developing plans and policies, Government Guidance states that the self-build register is likely to be a material consideration in planning applications. The guidance also says it should be taken into account in housing decisions, including preparing local housing strategies, delivering affordable housing, supporting community-led housing and building housing on land owned by the local housing authority. The register should also be used to inform disposal of Council owned land and when preparing redevelopment plans.
- 1.5 Over the years our approach to determining which permissions were 'suitable' for CSB (and should therefore be counted towards the supply needed to meet the demand indicated in 'Part 1' of the register) has evolved. In the first few monitoring reports we included all single plots in our supply. Following the publication of Right to Build Task Force Custom and Self-Build Planning Guidance in 2021 we amended our approach to generally align with that guidance (see Section 3 of our fifth monitoring report). Since that time until the 2022/23 monitoring report our approach was to include in our supply any permissions where a Community Infrastructure Levy (CIL) Exemption Part 1 Claim Form has been submitted (a declaration that the property will be built as CSB). Last year our approach was refined to take account of legislative changes and national guidance so that in our latest monitoring report we only count permissions if they show evidence of being a SCB project by meeting some of the following criteria
- The development has been identified as Self and Custom build on the planning application form;
 - It is clear that the initial owner has had significant input into the design and layout of the scheme;
 - The CIL Form 7 Part 1 has been submitted and CIL exemption granted for the project as a self and custom build development, with evidence of owner design input.

2 Key Points from Monitoring Report

- 2.1 The monitoring report shows that the overall demand for plots indicated on the self-build register was 8, with 6 on 'Part 1' of the register. This continues the reduction in the level of demand noted in the last monitoring report.
- 2.2 To meet the 2024/2025 demand, we will need to permission enough serviced plots to meet the demand indicated on Part 1 (6 plots) between 31/10/2025 and 30/11/28
- 2.3 The previous monitoring report (published February 2025) noted that we met the demand on the register, with a 'surplus' of 3 plots permissioned between 31/10/2023 and 30/10/2024. Surplus cannot be brought forward from previous base periods, and as such cannot be used to cover any of the demand from this or subsequent years.
- 2.4 Supply figures show that we permissioned 18 plots suitable for self-build between 31/10/24 and 30/10/25. As there is no 'residual' demand from previous base periods, this means all 18 plots can be counted towards the 31/10/2023 to 30/10/2024 demand of 8, leaving a 'surplus' of 10 plots (that cannot be 'carried forward' to meet the next year's supply because it predates the relevant base period).

2.5 The number of plots permissioned (18) is a slight increase on the number in last year's monitoring report, however as it is still relatively low this indicates that we may need to encourage more CSB opportunities to meet the minimum legal requirements.

Financial implications:

There are no direct financial implications identified within the report. (AB-21/04/2026)

Legal implications:

There are no direct legal implications identified within the report. (DH/002533-23/04/2026)

Planning policy monitoring report

Self-build Demand and Supply Published Version

9th Self-build Monitoring Report 31/10/24 to 30/10/25



May 2026

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Cover Photograph: Self-build home in East Devon taken by EDDC staff.

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Glossary of Terms

Self and custom house building

The building or completion by

- (a) individuals,
- (b) associations of individuals, or
- (c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals.

But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person. The wording of this definition is from the 2015 (amended) Self-build [Act](#).

Government [guidance](#) on self-build advises that “In considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout”.

In this report the term self-build is used to describe both custom build and self-build.

Private housebuilders, custom build and self-build

Private homebuilders are private individuals or groups of people who commission the construction of their home from a builder, contractor or package company (this is known as ‘custom build’ housing), or in a limited number of cases, physically build the home on their own with or without the help of sub-contractors (this is known as ‘self build’ housing). (Definition from [Right to Build Toolkit Glossary](#)).

Serviced plot of land

A plot of land that—

- (a) has access to a public highway and has connections for electricity, water and waste water, or
- (b) can be provided with those things in specified circumstances or within a specified period.

Definition included in 2015 (amended) Self-build [Act](#).

Community Infrastructure Levy (CIL)

A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. Learn more about the [Community Infrastructure Levy](#). Definition taken from Planning Portal [Glossary](#).

Base Period

Demand for self-build plots is measured yearly by ‘base periods’. The first base period is the date the self-build register was started until 30/10/2016. Subsequent base periods are measured from 31st October until 30th October the following year.

Summary of demand shown on register

This table shows demand figures from the self-build register by base period.

Table 1

Base Period	Number on Part 1	Number on Part 2
30/03/16 - 30/10/16	32	0
31/10/16 - 30/10/17	40	3
31/10/17 - 30/10/18	9	9
31/10/18 - 30/10/19	19	10
31/10/19 - 30/10/20	13	10
31/10/20 - 30/10/21	26	18
31/10/21 – 30/10/22	11	17
31/10/22 – 30/10/23	9	4
31/10/23 – 30/10/24	8	3
31/10/24 – 30/10/25	6	2
Total	173	76

Summary of supply of 'suitable permissions granted'

This table shows supply figures by base period.

Table 2

Base Period	Number of Suitable Permissions Granted
31/10/16 - 30/10/17	31
31/10/17 - 30/10/18	43
31/10/18 - 30/10/19	61
31/10/19 - 30/10/20	39
31/10/20 - 30/10/21	36
31/10/21 - 30/10/22	16
31/10/22 – 30/10/23	18
31/10/23 – 30/10/24	15
31/10/24 – 30/10/25	18
Total	277

Summary of 2024 to 2025 Base Period (31/10/2024 – 30/10/2025)

This table highlights key outputs from the monitoring report so that the overall picture can be viewed in one place.

Table 3

Overall Demand	8 plots - See Table 4
Demand on 'Part 1'	6 plots - See Table 4
Number of plots needed to be permissioned from 31/10/25 to 30/10/28 to meet demand from 2024-2025 base period	6 plots - See Table 4
Supply (suitable permissions granted) 2024 to 2025	18 plots – See Table 5
Is there a shortfall of sites to meet demand from previous years?	No - See Table 5
Number of individuals leaving register during base period	None
Location preferences	<p>Whimple is the most popular location this year, followed by 'villages and rural parishes', and Cranbrook (see Appendix 2).</p> <p>After 'anywhere'. Sidmouth, Exmouth, Ottery St Mary and Budleigh Salterton have been noted as the most popular locations since 2016. (see appendix 3).</p>
Number of bedrooms	<p>Most people who specified a size would like a four-bedroom property (see Appendix 2).</p> <p>This is in-line with the overall trend of 3- and 4-bedroom properties being the most desired property sizes for applicants since 2016. (see appendix 3).</p>
Age of applicant	Applicants during this base period were evenly split across 30-39, 50-59 and 60-69 age groups. (see Appendix 2).

	Since the introduction of the register, most applicants have been part of the 50-59, 40-49 and 60-69 age groups. (see appendix 3)
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1. Requirements

- 1.1 The Self- build and Custom Housebuilding [Act 2015](#) (as amended by the Housing and Planning [Act 2016](#)) places a duty on local authorities to keep a register of individuals and associations of individuals who wish to acquire plots of land on which to build their own home and to publicise that register. The Levelling Up and Regeneration Act (LURA) 2023 places a responsibility on councils to ensure that only permissions for developments specified as self and custom build are included in our supply count. East Devon District Council have counted only permissions with evidence that they are self and custom build projects in the following report sections.
- 1.2 The East Devon register is divided into 2 parts and, generally, only those with a local connection (they work or have lived in the District for the last three years) are included on 'Part 1'. The requirement to provide enough serviced plots to meet the demand shown on the register only applies to Part 1, but both Part 1 and 2 are used to assess the general level of demand to inform decisions of the Council. The level of demand is measured in 'base periods' that run from 31st of October until 30th of October in the following year.
- 1.3 We reviewed our arrangements for maintaining the register in February 2023 and decided to retain the local connection test. We have never imposed a financial test or a registration fee¹.
- 1.4 This report sets out both the demand for self-build in East Devon, as shown by the numbers on the self-build register and the supply of self-build plots in East Devon, as taken from the Council's records of self-build exemptions to the Community Infrastructure [Levy](#) (known as CIL) and subsequent self-build evidence review.

¹ See report to Strategic Planning Committee of 14th February 2023 at [Agenda for Strategic Planning Committee on Tuesday, 14th February, 2023, 10.00 am - East Devon](#)

2 Demand

- 2.1 The East Devon self-build register was started on 30th March 2016. Demand is measured in 'base periods'. The first base period ran from 30th March 2016 until 30th October 2016; the second base period was from 31st October 2016 to 30th October 2017; the third base period was from 31st October 2017 until 30th October 2018; the fourth base period was from 31st October 2018 until 30th October 2019; the fifth base period from 31st October 2019 until 30th October 2020, the sixth base period from 31st October 2020 until 30th October 2021; the seventh base period from 31st October 2021 until 30th October 2022, the eighth from 31st October 2022 until 30th October 2023, the ninth from 31st October 2023 until 30th October 2024, and the tenth from 31st October 2024 until 30th October 2025.
- 2.2 We have a local connection test that is met by people who work in East Devon, have lived in East Devon for at least the last three years or are current members of the regular armed forces (or former members who have left within the last three years). People who meet the local connection test are added to Part 1 of the register: we have a statutory duty to permission enough serviced plots suitable for self-build to meet the demand shown on this part of the register within three years of the end of the relevant base period. People who do not meet the local connection test are added to Part 2 of the register: there is no statutory duty to permission plots suitable to meet the demand shown on Part 2 of the register, but the total numbers (on Parts 1 and 2) must be had regard to in our planning, housing, regeneration and estate management functions.
- 2.3 The demand figures are set out in table 4 below. The table displays the base periods since 2016 in each row. The 'individuals' column contains the number of individuals (e.g. single members of the public, couples) that have been added to the self-build register during each base period. 'Associations' are groups of individuals or bodies/individuals representing a group who wish to acquire a self-build plot. As of 2026, no associations have been added to the self-build register. Part 1 and 2 of the register are split across the two columns, showing the new entries in each base period, with the vast majority of entries since 2016 being added to Part 1. The plots required is the number of relevant permissions required to cover the demand in part 1 of the register. The final column shows the period in which the required permissions must be granted, across the subsequent 3 base periods.

Table 4 Demand for Self Build Plots and Statutory Duty to Permission Suitable Serviced Plots

Base Period	Date range for base period	Individuals	Associations	Part 1	Part 2	Plots required	Period for meeting demand
1	31/03/16 - 30/10/16	32	0	32	0	32	31/10/16 - 30/10/19
2	31/10/16 - 30/10/17	43	0	40	3	40	31/10/17 - 30/10/20
3	31/10/17 - 30/10/18	18	0	9	9	9	31/10/18 - 30/10/21
4	31/10/18 - 30/10/19	29	0	19	10	19	31/10/19 - 30/10/22
5	31/10/19 - 30/10/20	23	0	13	10	13	31/10/20 - 30/10/23
6	31/10/20 - 30/10/21	44	0	26	18	26	31/10/21 - 30/10/24
7	31/10/21 - 30/10/22	28	0	11	17	11	31/10/22 - 30/10/25
8	31/10/22 - 30/10/23	13	0	9	4	9	31/10/23 - 30/10/26
9	31/10/23 - 30/10/24	11	0	8	3	8	31/10/24 - 30/10/27
10	31/10/24 - 30/10/25	8	0	6	2	6	31/10/25 - 30/10/28

3 Supply

- 3.1 Permissions granted within the 2024 to 2025 base period have been analysed to ensure they meet the definition of self and custom build. Rather than only counting CIL exemption as done prior to the 2023/24 monitoring period, EDDC only count permissions if they show evidence of being a CSB project by meeting some of the following criteria:
- The development has been identified as Self and Custom build on the planning application form;
 - It is clear that the initial owner has had significant input into the design and layout of the scheme;
 - The CIL Form 7 Part 1 has been submitted and CIL exemption granted for the project as a self and custom build development, with evidence of owner design input.
- 3.2 Appendix 1 identifies all the plots included in our self-build supply figures for the period from 31st October 2024 until 30th October 2025. Full details of supply figures for previous years are included in previous monitoring reports, with a summary included in Table 5 below.
- 3.3 Following the legislation set out in the Self and Custom-Build Housebuilding Act 2015², permissions are considered only within the base period in which they were permissioned. As such, any excess permissions granted cannot be brought forward to cover demand in subsequent base period, unlike unmet demand shortfalls that roll forward for 3 base periods or until it is covered by the permissions being granted.
- 3.4 In the 2020 to 2021 base period there was a marked decrease in the number of CIL exemptions for self- build compared to previous years (16 plots compared to between 31 and 61 plots in previous monitoring years). This meant that there was a 'shortfall' of 10 plots in the first base periods in which the demand for the 31/10/20 to 30/10/21 period could be met (the 31/10/2021 to 20/10/2022 base period) leaving two years in which this demand could be met (from 31/10/23 to 30/10/25). This demand was met in the 2022 to 2023 base period.
- 3.5 The lower delivery rate of plots continued in the 31/10/22 to 30/10/23 base period when 18 plots were permissioned. This supply met both the 'residual' demand from the 31/10/20 to 31/0/10/21 (10 plots) and part of the demand from the 31/10/21 to 30/10/22 base period (8 plots), leaving a 'residual' need of 3 plots, which was met in the 2023-2024 base period.

² Self-build and Custom Housebuilding Act 2015 – Section 2A (7)

- 3.6 The trend of lower delivery rates continued into the ninth base period of 31/10/2023 to 30/10/24 with just 15 plots being permissioned. Despite this decrease, the supply meet both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covered all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots.
- 3.7 The tenth base period of 31/10/2024 to 30/10/25 has shown a minor increase in the number of plots being permissioned with the number being 18. As surplus permissions cannot be brought forward from previous base periods the surplus of 3 from 23-24 cannot be used to cover to the demand for any subsequent years. Despite this, the supply of 18 plots covers all the demand from the 31/10/2023-30/10/2024 base period (8 plots), with a surplus of 10 plots

Table 5 Supply based on permissions.

Base	Base dates	Demand	Period for meeting demand	Supply Year	Permissions	Shortfall/surplus	Outcome
1	31/03/16 - 30/10/16	32	31/10/16 - 30/10/19	31/10/16 - 30/10/17	31	-1	demand met by 16 - 18 supply
2	31/10/16 - 30/10/17	40	31/10/17 - 30/10/20	31/10/17 - 30/10/18	43	2	demand met by 17 - 18 supply
3	31/10/17 - 30/10/18	9	31/10/18 - 30/10/21	31/10/18 - 30/10/19	61	52	demand met by 18 - 19 supply
4	31/10/18 - 30/10/19	19	31/10/19 - 30/10/22	31/10/19 - 30/10/20	39	20	demand met by 19 - 20 supply
5	31/10/19 - 30/10/20	13	31/10/20 - 30/10/23	31/10/20 - 30/10/21	36	23	demand met by 20 - 21 supply
6	31/10/20 - 30/10/21	26	31/10/21 - 30/10/24	31/10/21 - 30/10/22	16	-10	Demand met by 20 - 22 supply
7	31/10/21 - 30/10/22	11	31/10/22 - 30/10/25	31/10/22 - 30/10/23	18	-3	Demand met by 21 - 23 supply
8	31/10/22 - 30/10/23	9	31/10/23 - 30/10/26	31/10/23 - 30/10/24	15	3	Demand met by 23 - 24 supply
9	31/10/23 - 30/10/24	8	31/10/24 - 30/10/27	30/10/24 - 30/10/25	18	10	Demand met by 24 - 25 supply
10	31/10/24 - 30/10/25	6	31/10/25 - 30/10/28	30/10/25 - 30/10/26	Unknown		Determined in future monitoring periods

Note: No surplus can be carried forward if it predates the end of the subsequent base period

3.5 In order to assess whether the supply of potential plots included in Table 5 above is starting to deliver self-build homes, we have also assessed the number of permissions that have commenced. Table 6 below summarises the outcome. Unsurprisingly, there are fewer plots included in the supply when these figures are used (the supply year relates to the date of permissions rather than commencement), but previously the demand shown was met by sufficient plots within one or two years (up to three years is allowed). If this approach were to be taken, the 2023-2024 supply would meet the residual demand of 5 arising from the 2021 – 2022 base period, and some (7 plots) from the residual demand of 9 from the 2022-2023 period, leaving a shortfall of 9 plots that would need to be met between the 2024-2027 period.

Table 6 Supply based on commencements.

Base Period	Base dates	Demand	Period for meeting demand	Supply Year	Permissions	Shortfall/surplus	Outcome
1	31/03/16 - 30/10/16	32	31/10/16 - 30/10/19	31/10/16 - 30/10/17	23	-9	demand met by 16 - 18 supply
2	31/10/16 - 30/10/17	40	31/10/17 - 30/10/20	31/10/17 - 30/10/18	34	-15	demand met by 17 - 19 supply
3	31/10/17 - 30/10/18	9	31/10/18 - 30/10/21	31/10/18 - 30/10/19	48	39	demand met by 18 - 19 supply
4	31/10/18 - 30/10/19	19	31/10/19 - 30/10/22	31/10/19 - 30/10/20	29	10	demand met by 19 -20 supply
5	31/10/19 - 30/10/20	13	31/10/20 - 30/10/23	31/10/20 - 30/10/21	26	13	demand met by 20 - 21 supply
6	31/10/20 - 30/10/21	26	31/10/21- 30/10/24	31/10/21- 30/10/22	8	-18	Demand met by 21-24 supply.
7	31/10/21- 30/10/22	11	31/10/22- 30/10/25	31/10/22- 30/10/23	15	-14	Demand met by 22-25 supply. No demand is met by 23-24 supply (it is taken by residual from 20/21 base period and some from the 22/23 period). This leaves a residual of 5 to be met in the next base period (31/10/2024 – 30/10/25) and 9 to be met in the next two base period (31/10/25-30/10/27)
8	31/10/22- 30/10/23	9	31/10/23- 30/10/26	31/10/23- 30/10/24	9	-14**	No demand is met by 24-25 supply (it is taken by residual from 21/22 base period and some from the 22/23 period). This leaves a residual of 1 to be met in the next base period (31/10/2025 – 30/10/26) and 8 to be met in the next two base period (31/10/25-30/10/27)
9	31/10/23- 30/10/24	8	31/10/24- 30/10/27	31/10/24- 30/10/25	13	-9	

Note: No surplus can be carried forward if it predates the end of the subsequent base period

** A review of the 23/24 monitoring report during the 24/25 update revealed a small error in the shortfall for the 22/23 base year. The true figure is -14 rather than the -17 as quoted in that paper. 'Supply by commencements' is not the figure used for government reporting and is produced in addition to the main 'supply by permission' to provide the council with a wider view of SCB delivery.

4 Publicity

- 4.1 Our web site has a dedicated self-build [page](#) where the register is advertised and the application forms are readily available.

5 Additional Information from the Self-build Register

- 5.1 In addition to the 'standard' questions that are needed to establish whether applicants meet the criteria set for inclusion on the self-build register, extra questions are to help tailor our approach such as where in East Devon people are most interested in building, what people are interested in building and how much money is available to finance it. The results are useful in helping to provide evidence to inform planning applications, Council decisions and policy development.
- 5.2 Charts are included in Appendix 2 of this report for the current monitoring year (31/10/2024 to 30/10/2025). Some key points from this show that:
- The ages of people on the register are evenly split across the 30-39, 50-59 and 60-69 age groups.
 - The majority of applicants lived in East Devon;
 - The most popular location for self-building was Whimble, although several locations were highlighted;
 - Four-bedroom properties are the most desired specified dwelling size, with 28.6% of people mentioning this.
 - Fewer than half of the applicants gave a specific overall budget for their project. Of those that did, the median figure was £500,000, and.
 - The majority of people on the register want a detached dwelling.
- 5.3 In addition to information from the last monitoring period, Appendix 3 provides similar charts from the start of the register in March 2016 until 31/10/2025. Some key points from this are that:
- over half of the people on the register lived in East Devon at the time of their application,
 - the most popular age cohort for joining the register is 50-59,
 - the towns of Sidmouth, Exmouth, Ottery St. Mary and Budleigh Salterton are the most popular locations.

Appendix 1 Table of Permissions Suitable for Self-build

The 'Date' column refers to the date of the permission. The 'Commenced' column specifies the number of plots that have been commenced.

Table 7

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
1	24/0632/FUL	Sea Chimneys, Southdown Road, Beer, Devon, EX12 3AE	Demolition and replacement dwelling and garage with associated landscaping.	Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	27/11/2024	17/03/2025
2	24/1491/FUL	Site Of Penny Park, Kersbrook Lane, Kersbrook	Demolition of existing dwelling and replace with 1no new dwelling, extension of domestic amenity space, creation of a new driveway off an existing access to the highway, and associated landscaping and parking	Identified as self/custom build on application form and DAS, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	10/12/2024	20/12/2024

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
3	24/1092/FUL	Maer Brook , Maer Road, Exmouth, Devon, EX8 2DB	Demolition of existing two-storey outbuilding and erection of two storey dwelling	Condition 8 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	13/12/2024	25/08/2025
4	24/1326/TEC	Camboree House, Exton Lane, Exton, Exeter, EX3 0PN	Technical details consent for the construction of 1no. self-build dwelling (following approval 23/1621/PIP)	Condition 8 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	19/12/2024	01/07/2025
5	24/1353/FUL	Dalwood Hill Farm Bungalow , Burrow Knapp Way, Dalwood, EX13 7ES	Demolish existing dwelling and detached garage, construct 1no new dwelling and detached garage.	Condition 8 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form,	1		

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
				CIL Part 1 exemption, BNG exemption for SCB			
6	24/2313/FUL	Barn West Of Tale Head Cottage, Payhembury	Single new dwelling to replace previous approved new build C3 designs under 21/2780/FUL	Condition 9 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	27/01/2025	15/08/2025
7	24/2285/FUL	Maer Craig, 16 Foxholes Hill, Exmouth, EX8 2DF	Demolition of existing dwelling and construction a 1.no replacement dwelling	Condition 8 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	07/03/2025	
8	25/0100/FUL	Land North East of Grange Close, Lympstone, EX8 5LD	The erection of two detached dwellings with integral double garages, to include associated	Condition 10 of planning permission ensures construction of dwelling as self-build/custom-build – being sold as 2 self-build	2	04/04/2025	22/11/2025

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
			hard and soft landscaping.	plots with customisable homes, Identified as self/custom build on application form, CIL Part 1 exemption			
9	25/2519/FUL	Castlewell, Stockland, Honiton, EX14 9DB	Demolition and replacement of single dwelling with associated works, to include alterations to outbuilding to create a bat loft.	Condition 5 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	01/05/2025	22/08/2025
10	24/2397/FUL	7 Orchard Close, Lympstone, Exmouth, EX8 5LA	Replacement dwelling, garage and associated works	Condition 12 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	08/05/2025	18/08/2025
11	24/2690/FUL	Estuary House, Ebford,	Erection of a replacement dwelling,	Condition 8 of planning permission ensures	1	04/07/2025	08/09/2025

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
		Exeter, EX3 0PF	following the demolition of the existing dwelling	construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design			
12	23/2422/FUL	Land To Rear Of Great Halls, Aylesbeare, EX5 2FD	Erection of highly sustainable self-build dwelling with associated landscaping and biodiversity enhancements.	Appeal statement and officers delegated report confirms this will be a self-build dwelling, CIL Part 1 exemption, Owner involvement in final design	1	22/07/2025	
13	25/1227/FUL	7 Northview Road, Budleigh Salterton, EX9 6BZ	Replacement dwelling (redesign of 24/2092/FUL), associated works and replacement of garage pitched roof with flat roof.	Condition 8 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB,	1	01/09/2025	05/01/2026
14	25/1286/FUL	South Hill Barn, Woodbury, Exeter, EX5 1LA	Demolish existing dwelling, construction of new dwelling and associated works	Condition 12 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom	1	23/09/2025	14/10/2025

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
				build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design			
15	24/1045/FUL	Land Adjacent To Woodthorpe. Kilmington	Erection of a single storey 3-bed detached self-build bungalow and associated drainage works	S106 agreement, Condition 10 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, BNG exemption for SCB, Owner involvement in final design	1	13/10/2025	
16	25/1602/FUL	Hideaway, Stockland, Honiton, EX14 9BY	Demolition of existing dwelling; construction of replacement dwelling and associated works	Condition 3 of planning permission ensures construction of dwelling as self-build/custom-build, Identified as self/custom build on application form, CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design	1	21/10/2025	
17	25/1020/FUL	Land At Bogmoor Lane,	Conversion of agricultural barn to single	Identified as self/custom build on application form,	1	30/10/2025	06/11/2025

No	Reference	Address	Proposal	Evidence of CSB	Plots	Date	Commenced
		Knowle Cross Lane, Whimble	dwelling and change of use of agricultural land to residential curtilage; erection of detached garage with garden store.	CIL Part 1 exemption, BNG exemption for SCB, Owner involvement in final design			

Appendix 2 Additional information from register 31/10/2024 to 30/10/2025

All figures relate to entries on the self-build register between 31/10/2024 and 30/10/2025 only. Numbers around the pie charts refer to the number of responses.

One applicant did not provide any additional information, and so they will be omitted from the charts below.

Figure 1 – Current place of residence

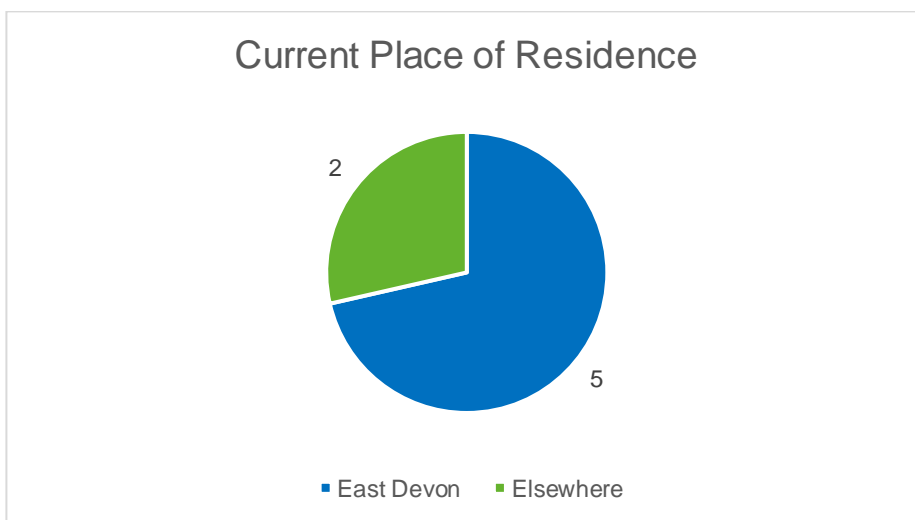


Figure 2 – Age of applicant

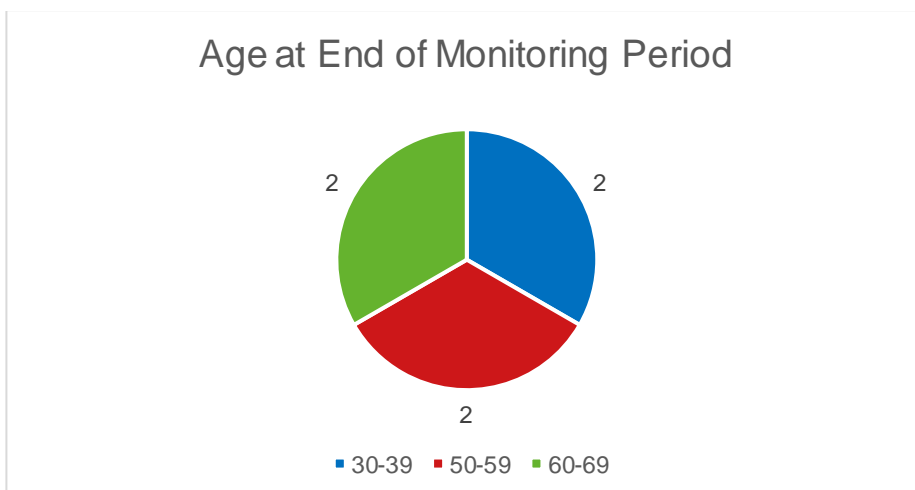


Figure 3 – Where plots are wanted.

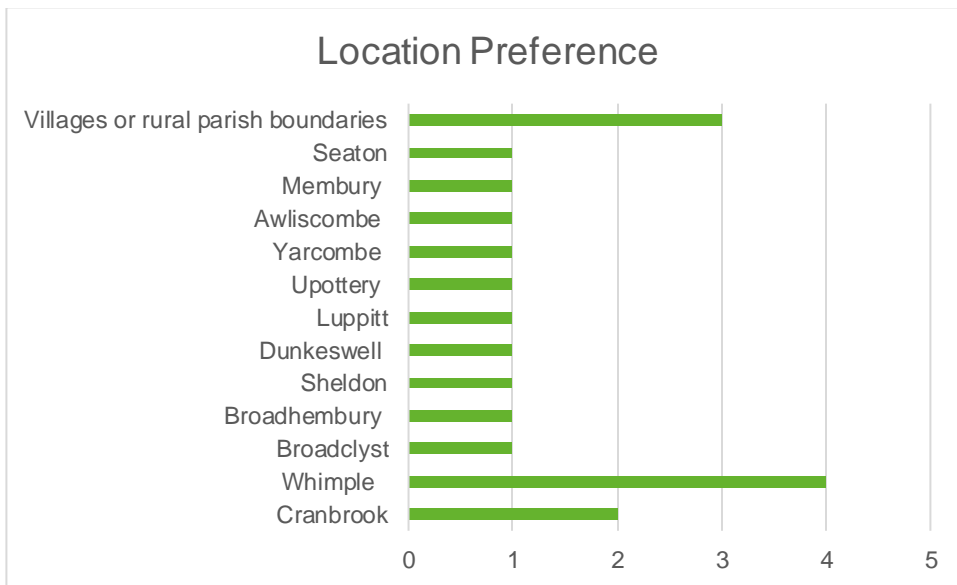


Figure 4 – Number of bedrooms wanted.

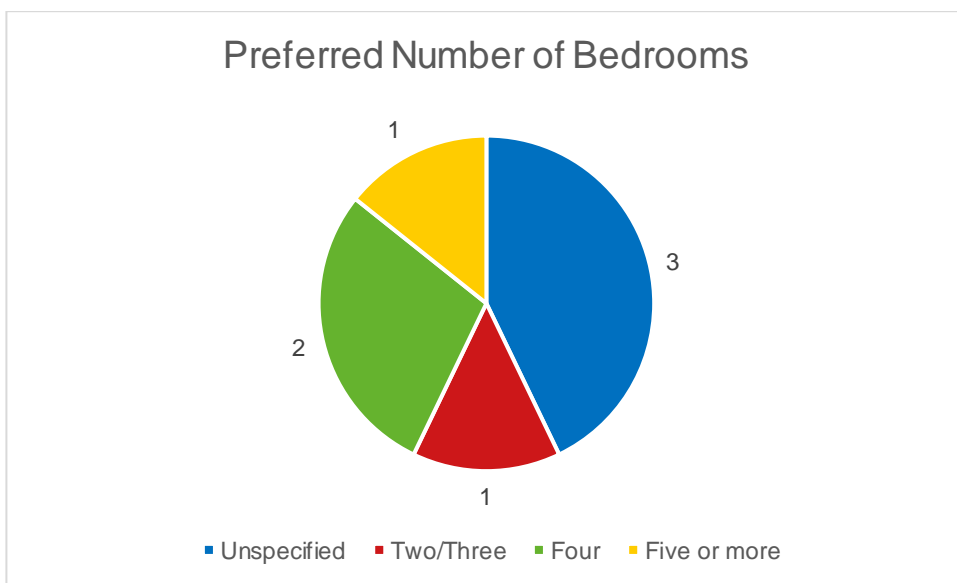


Figure 5 – Type of dwelling wanted

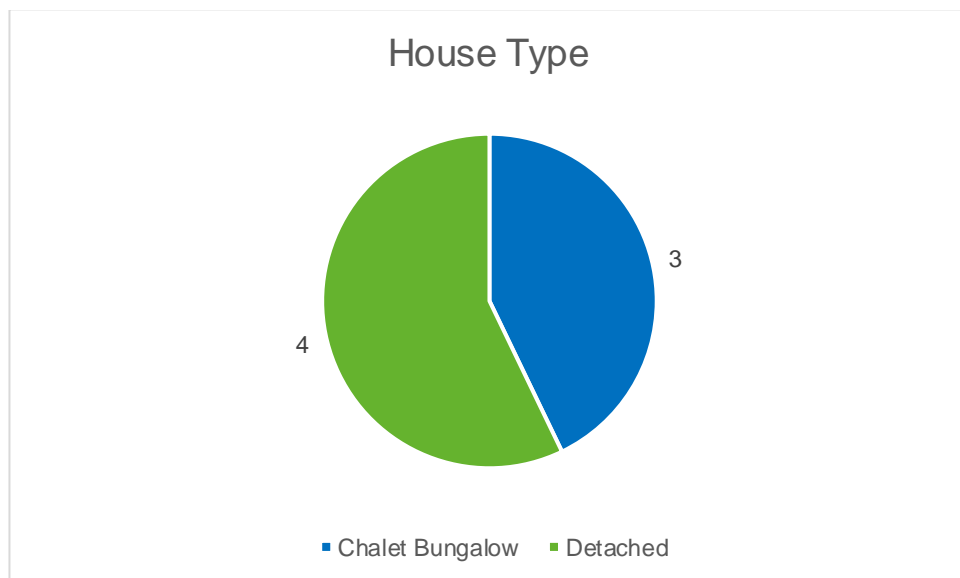
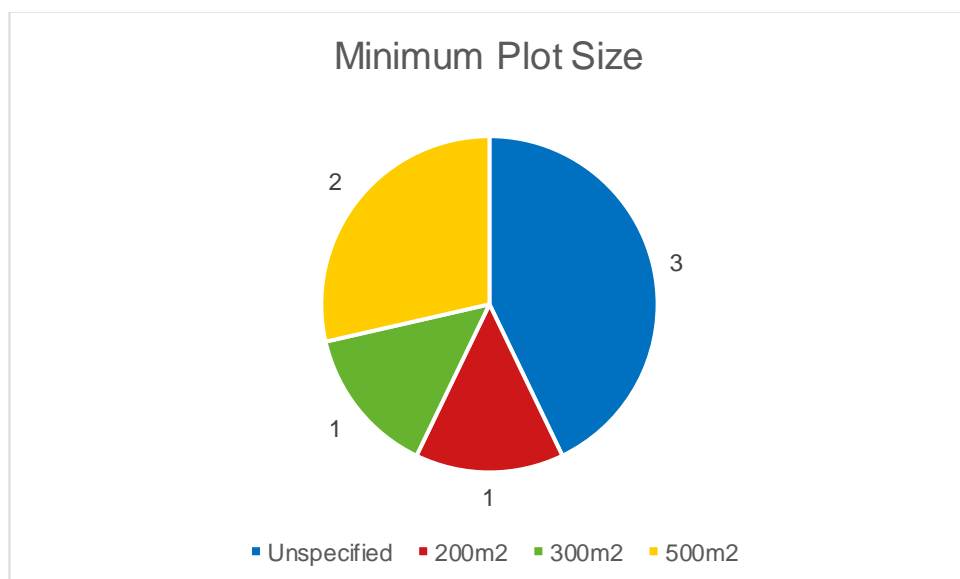


Figure 6 – Minimum plot size wanted



Plot preferences - Please note that, as a rough guide, a plot of 200 m² or less would accommodate a small terraced house; a 200m² to 300m² plot, a 2/3 bed modern estate house ; a 300m² to 500m² plot, a 4 bed detached estate house; a 500m² to 1000m² plot, a suburban semi/detached with modest to large garden; a 1000m² to 4047m² (1 acre) plot, a house with a large/very large garden; and a 4047m² (1 acre) to 1 hectare plot, a house with very large garden/small holding.

Figure 7 - Maximum plot size wanted

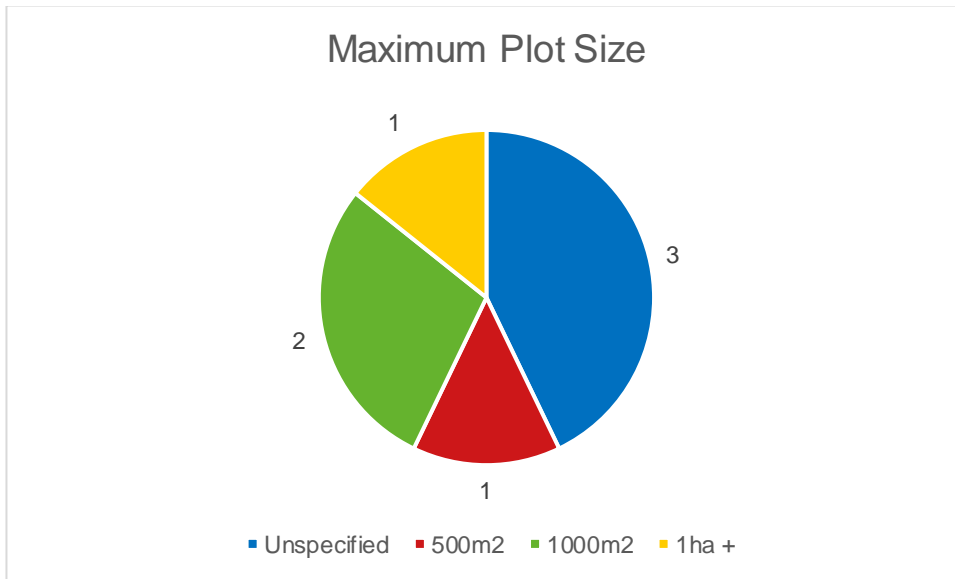


Figure 8 – Budget (plot only)

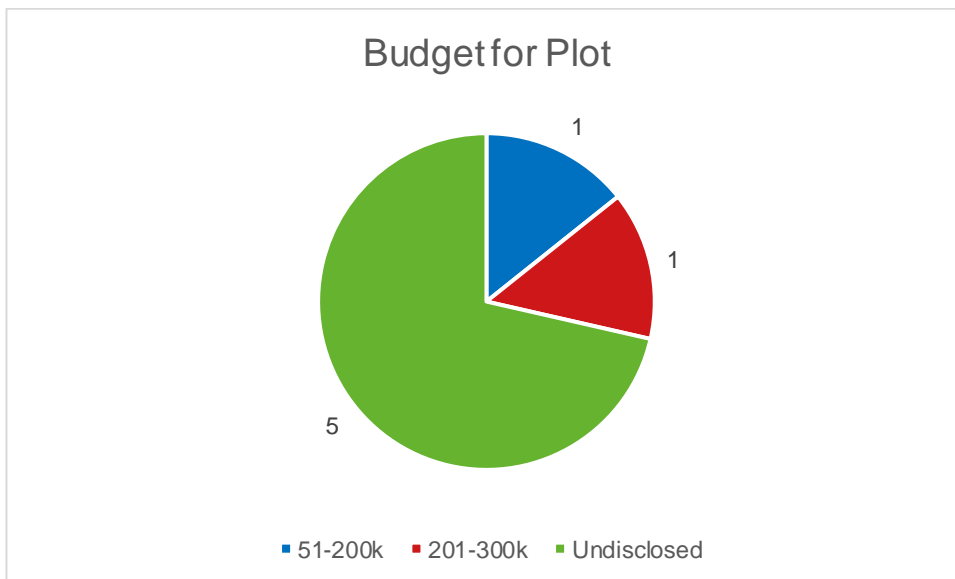
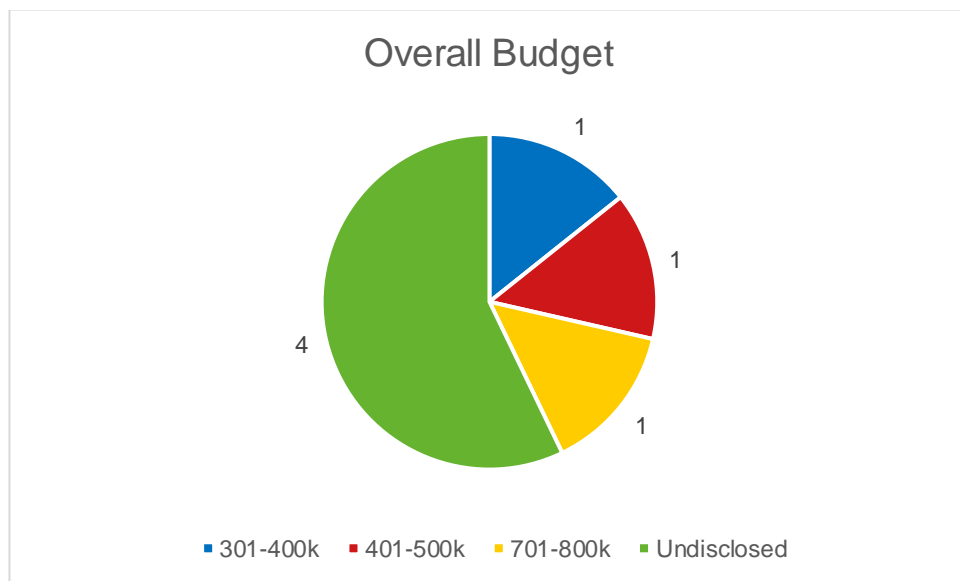
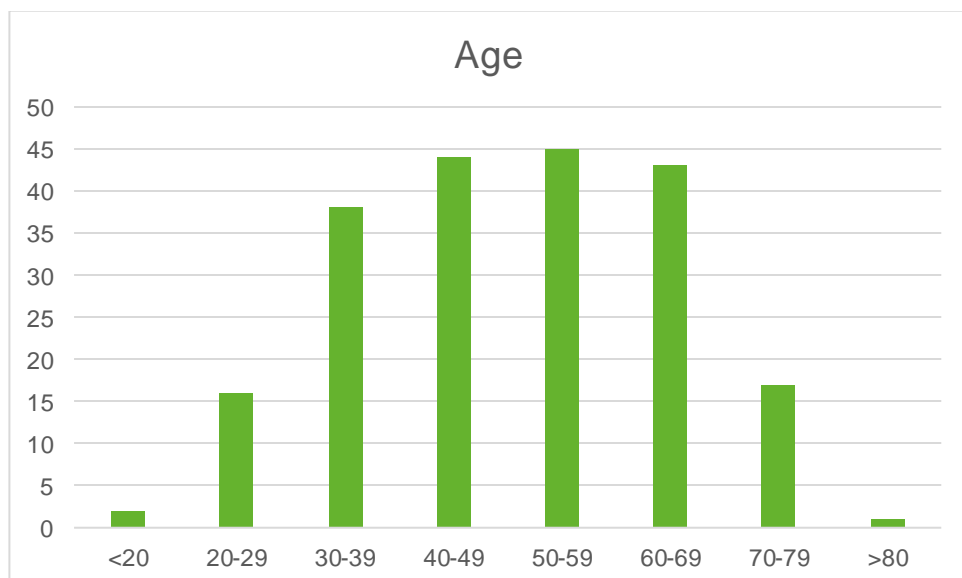


Figure 9 – Overall budget (land and building costs)

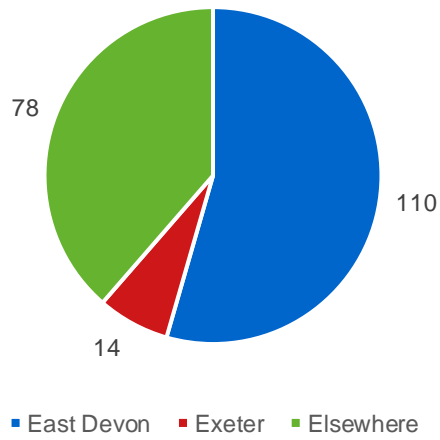


Appendix 3 Additional information from register 30/03/2016 to 30/10/2025

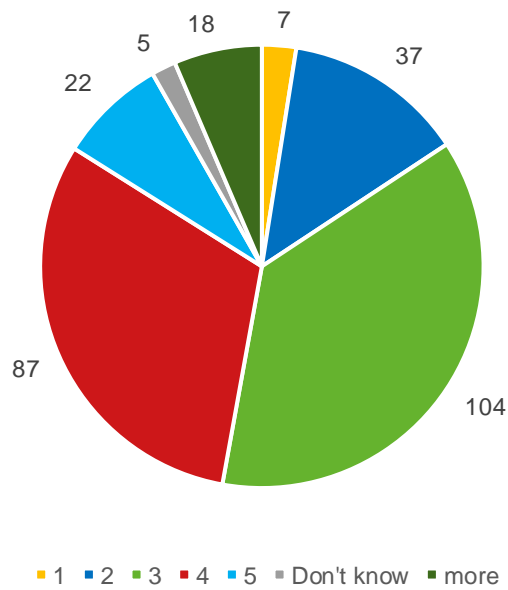
The following graphs show the cumulative statistics gathered since the introduction of the Self-build register, from the 30/03/2016 to 30/10/2025.



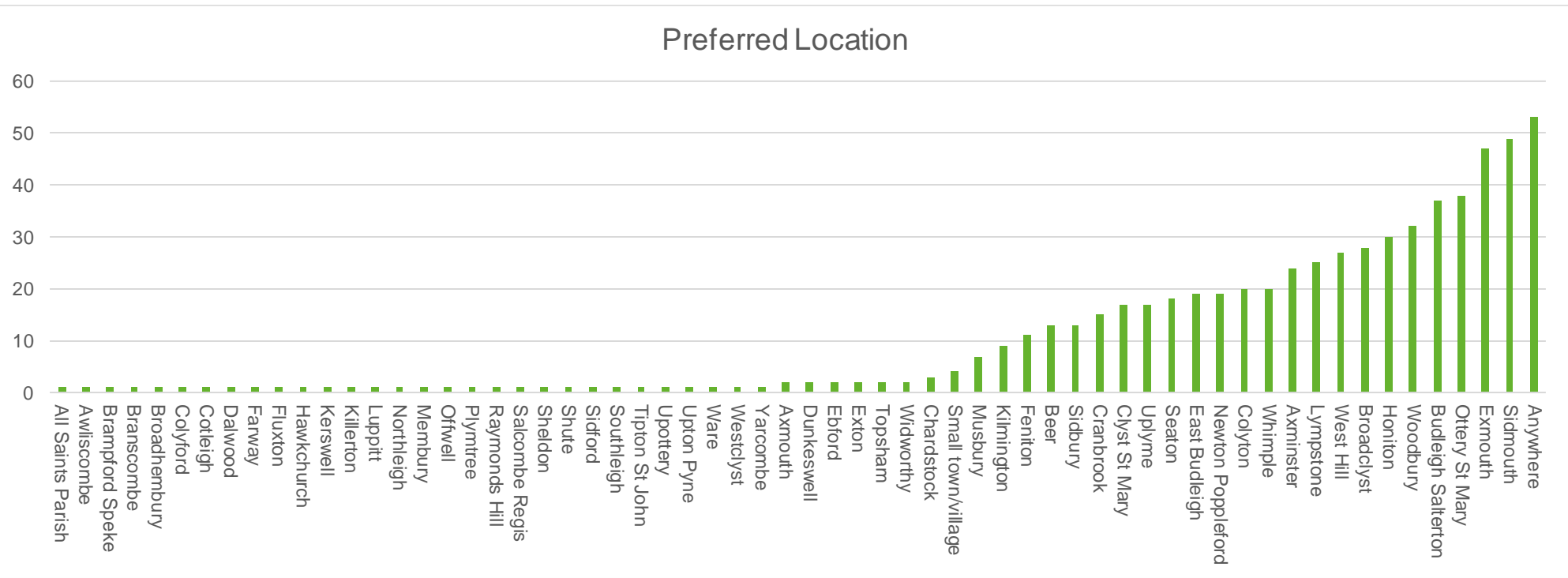
Location of applicant

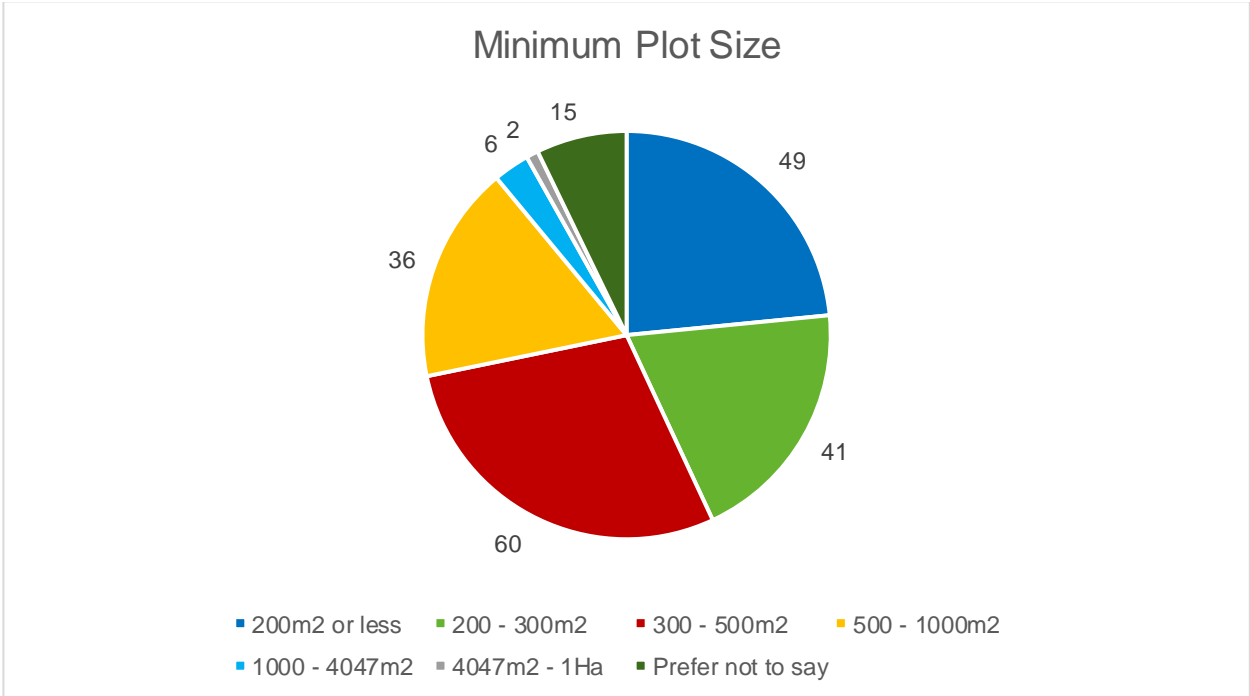
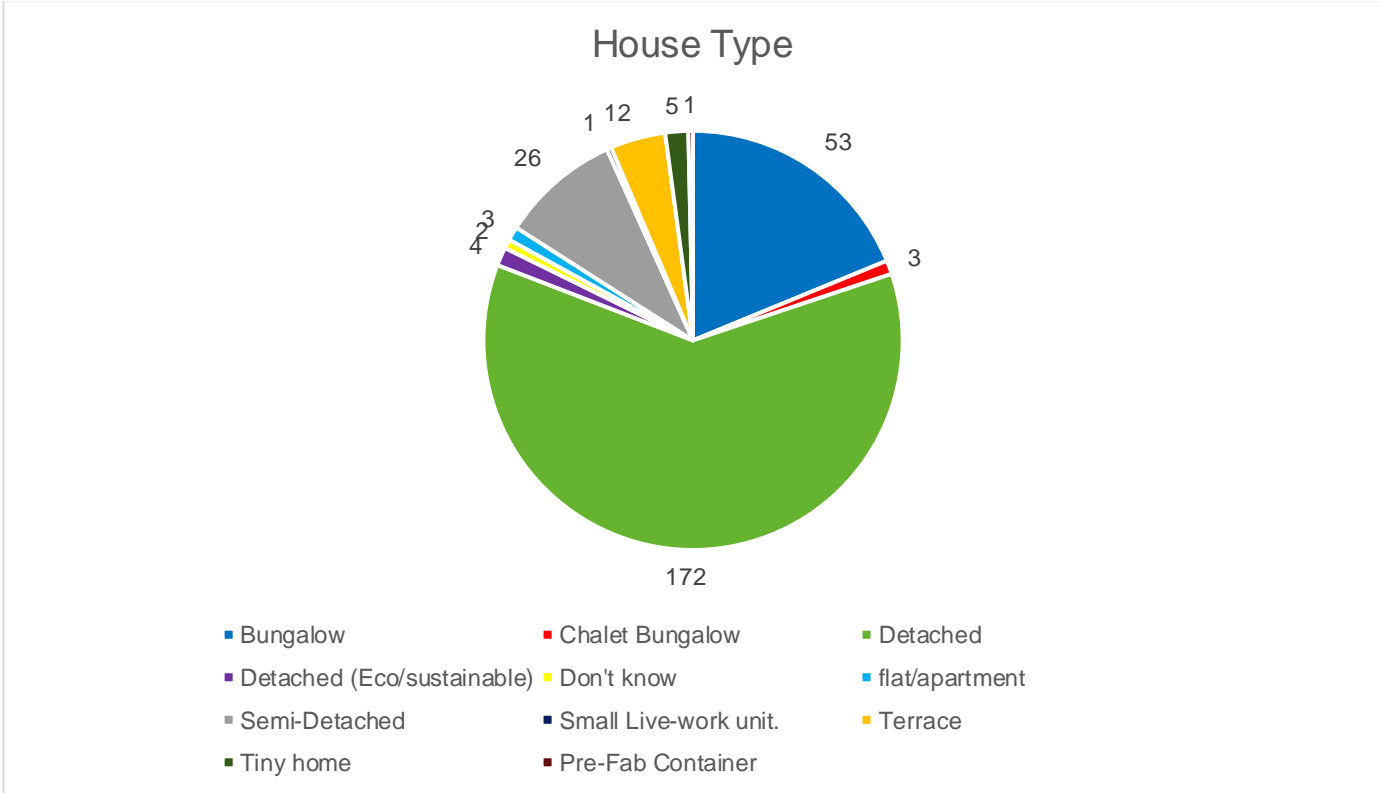


How many bedrooms would you like in your new home?

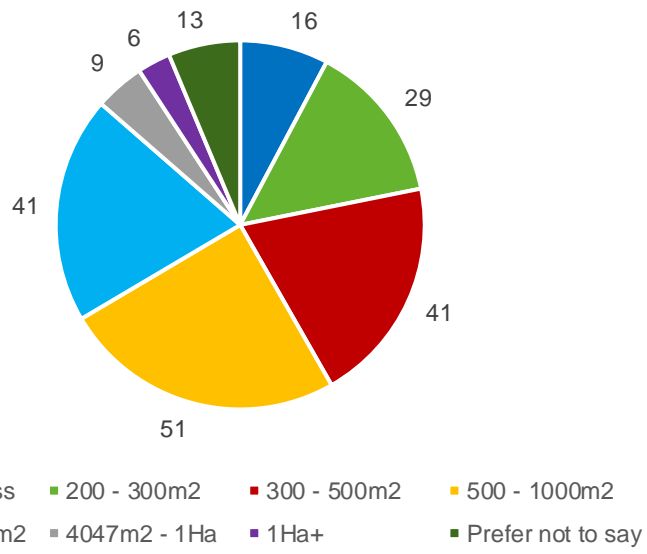


Preferred Location

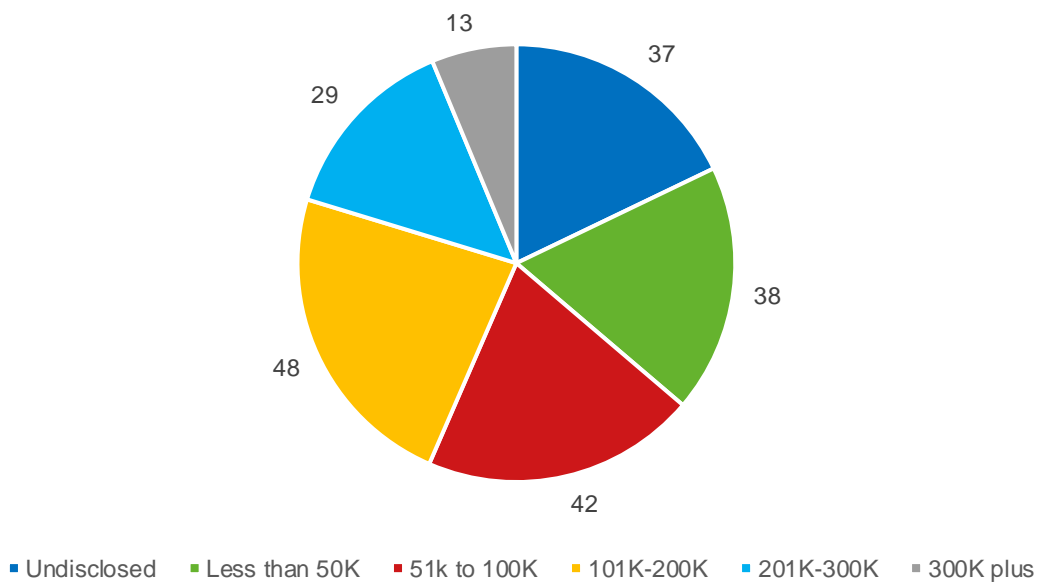




Maximum Plot Size



Budget for Plot



Overall Budget

