

Date of Meeting 8 July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – Consultation feedback, timetable and future workplan

Report summary:

This report sets the scene for future local plan production work. Specifically this report:

- a) Advises on feedback received at the 1st stage of Regulation 19 consultation – noting that there were a significant number of comments received for the 1st stage consultation that concluded in March 2025.
- b) Provides a steer on how the Council can effectively and efficiently respond to concerns raised in consultation feedback. We would highlight, that several Government bodies raised concerns and we would want to seek, where reasonable and appropriate, to address these and other comments through statements of common ground/dialogue and in some cases through plan changes.
- c) Highlights ongoing evidence production work to inform and justify plan policy for the 2nd round of consultation.
- d) Sets the scene and timetable for the proposed second round of Regulation 19 consultation. It is planned that this should start in in October 2025 and conclude in November 2025.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1. That Strategic Planning Committee endorse the proposed new local plan making timetable and work plan, including studies to be completed.
2. That Members note the change to the Planning Practice Guidance regarding two stage Regulation 19 consultations and identify any areas where they would like officer advice on potential changes to the plan that are not already being considered in the work programme set out in this report. These to be addressed in a report to a future meeting prior to the second Regulation 19 consultation materials being presented to the Committee.

Reason for recommendation:

To establish a formal work plan for local plan production.

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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

Climate change Low Impact

Risk: No specific risk impacts are identified.

Links to background information Links 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 Work to date on the local plan

- 1.1 Committee will be aware of the significant progress that has been made on local plan production to date. Of most recent importance was the conclusion of the 1st round of consultation under Regulation 19 of the plan making regulations. This report specifically highlights matters arising from this and action to take the plan forward through to a 2nd round of consultation and then to plan submission for examination, through the examination and thereafter to adoption.

2 Feedback on the 1st stage of Regulation 19 consultation

- 2.1 The 1st round of local plan consultation, under Regulation 19 stage of plan making, concluded on 31 March 2025. In total we have recorded 3510 individuals or organisations making comment on the plan, some commenting on one matter only though many commenting on a wide range of matters.
- 2.2 The separate comments received on the plan are logged on Commonplace against the policy or part of the plan that they relate to. Where people/organisations **did not** use the software we have uploaded their comments onto the system. With all comments being on the software it ensures that we have a complete and comprehensive set of all comments in a single place. Though in some cases, where for example respondent

accompanied submissions with such material as images, maps or technical assessments these sit outside the software.

- 2.3 We would highlight that uploading non-commonplace made comments on to the portal was a time-consuming task, but we concluded it was valuable to do so and we would not have authority to dismiss any comments that did not come through the portal.
- 2.4 In many cases people did not make it explicitly clear which part or parts of the plan they were commenting on so there has had to be some officer interpretation of submissions to determine where they should be attributed. In some cases comments have been split up where they clearly relate to separate plan parts, even if not stated or set out as such in submissions.

3 Issues raised in Regulation 19 consultation feedback

- 3.1 We have undertaken an assessment of matters raised in consultation feedback. A consultation feedback report is appended to this report and it sets out a summary, on a policy by policy, and allocation site by allocation site basis, of key matters raised in feedback and scale of comments/concerns highlighted.
- 3.2 We received 1.1million words in feedback on the consultation. It is highlighted that we have used artificial intelligence software (CoPilot) to summarise the comments received, noting it would be a mammoth task to undertake in the absence of use of such technology and not using the technology would delay feeding back by several weeks. Use of such software also ensures a more consistent approach to and balance in feedback reporting.
- 3.3 The key themes and issues raised include:
- **Volume and Focus of Responses:** The most commented-on policy was SD01, particularly the proposed allocation of site Exmo_20, which drew over 1,100 responses and multiple petitions. Concerns centred on biodiversity, flood risk, infrastructure, and procedural fairness.
 - **Housing Strategy:** There was widespread objection to the housing requirement figure of 20,909 dwellings (80% of the standard method), with calls to meet the full need of 26,136 dwellings. Respondents also criticised the stepped trajectory and over-reliance on a single new settlement.
 - **Spatial Strategy and Settlement Hierarchy:** While there was broad support for focusing growth in the West End and Main Centres, concerns were raised about the under-classification of certain settlements (e.g. Feniton) and the underrepresentation of Exmouth's strategic role.
 - **Infrastructure and Viability:** Many responses highlighted the need for stronger commitments to infrastructure delivery, particularly for healthcare, education, and utilities. Viability concerns were raised across multiple policies, especially in relation to affordable housing, climate policies, and biodiversity net gain.
 - **Environmental Protection:** There was strong support for policies promoting biodiversity, climate resilience, and landscape protection. However, several policies were criticised for being overly rigid, duplicative of national guidance, or lacking clarity on implementation.

- **Sustainability Appraisal and Legal Compliance:** Numerous representations challenged the soundness and legal compliance of the Sustainability Appraisal, particularly regarding the allocation of Exmo_20. Concerns included inconsistencies with the HELAA, lack of consultation, and failure to apply the Mitigation Hierarchy.
- **Neighbourhood Plans and Community Engagement:** Respondents expressed frustration over the perceived marginalisation of neighbourhood plans and the usability of consultation tools. There were calls for greater transparency, responsiveness, and respect for local input.

3.4 At a later date we will bring a report back to committee with more detailed officer commentary around the issues raised in comments on the plan and possible changes. This will help inform and set the context/justification for proposed plan changes.

4 Responding to comments on the plan

4.1 It is to be expected that any plan that is submitted for examination will be submitted with objections. This is standard and as such there should be no expectation that all (or even most or in fact any) objections will be resolved. This is specifically noting that some commenting on the plan will have diametrically opposed views from others making comments on the same subject matter or for example development site allocation.

4.2 There is scope, however, to seek to address some objections to the plan. It is suggested that where these have come from statutory bodies and consultees, and specifically from bodies falling under the Duty to Cooperate, it is specifically appropriate to review whether seeking to resolve concerns raised is desirable and appropriate. We do however need to be careful to limit the changes to the plan particularly in light of new guidance in Planning Practice Guidance which states:

“How do the implementation aspects of the NPPF apply to plans where more than one round of Regulation 19 consultation has been undertaken?”

Some local planning authorities may undertake more than one round of Regulation 19 consultation on a plan. Where this is the case, for the purposes of implementing Annex 1 of the Framework, a plan is normally to be taken as having reached the Regulation 19 stage at the date on which the first round of Regulation 19 consultation commenced. However, in some limited circumstances, a plan is to be taken as having reached Regulation 19 on the date that a subsequent round of consultation commenced. These limited circumstances could include instances such as when the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage.

Paragraph: 86 Reference ID:61-086-20250616

Revision date: 26 06 2025”

It is essential therefore that we ensure that the plan does not change significantly from that presented in the initial Regulation 19 stage if the plan is to proceed under the transitional arrangements. Members are asked to have due regard to this when suggesting any further changes to the plan and should note that while some individual changes may not be significant in themselves it is the cumulative impact of changes that may be significant. However, if Members have concerns highlighted through the

consultation responses appended to this report, then there is an opportunity to highlight these at the meeting so that officers can provide advice on these issues in advance of the committee considering the next iteration of the plan.

5 Summary and response to comments on the local plan

- 5.1 In addition to receiving comments from the public and the development industry (as well as interest groups and others) we highlight that a number of bodies with statutory powers (including some we are legally required to consult) and other public organisations with specific responsibilities also commented on the plan.
- 5.2 Some of these statutory bodies raise significant concerns and objections to the plan. In some cases these could be overcome with plan changes that would not be substantial in respect to actual wording changes but could overcome concerns highlighted and reduce the number of modifications needed at examination (and by design the number of objections that would need to go forward to examination).
- 5.3 It is stressed that the Council is not obliged to agree with comments made and may take a different view on matters from those making the comment. However, it would be prudent to consider matters carefully and review whether plan changes would be desirable and/or further assessment work is needed which in some cases it is indicated is needed/desirable.
- 5.4 The following table briefly summarises some of the key issues raised by statutory bodies and indicates the work being undertaken to address concerns.

| Issue | Actions |
|---|---|
| National Landscapes The Levelling-up and Regeneration Act 2023 (LURA) introduced a duty for planning authorities to 'seek to further' the statutory purposes of protected landscapes (conserving and enhancing their natural beauty). Representations have been received from Natural England and both the Blackdown Hills and the East Devon National Landscape partnerships raising concerns that it is not clear how the plan strategy and site allocations comply with the duty to further the purposes of the national landscapes. | Review allocations within or adjacent to a national landscape to assess whether they are justified in light of the 'duty to further' and the relevant guidance . Update the 'Major Development in the National Landscape Topic Paper ' to address concerns raised by Natural England and the National Landscape partnerships. |
| Wind Energy The local plan policy map identifies areas suitable for wind energy that are relatively small, and some that are close to the national landscapes (modern wind turbines can be 150 metres high). The Environment Agency, Historic England, Natural England and the Blackdown Hills Partnership have raised concerns about the potential impact of wind turbines on heritage assets, landscape and water quality. There is concern that identifying relatively few, small sites | Consider whether removing the areas identified from the proposals map and amending policy text could reasonably overcome the issues. Although noting that this would appear to be contrary to the 2023 version of the NPPF that the plan needs to comply with. |

| Issue | Actions |
|--|---|
| <p>is effectively an allocation for which assessment work has not been undertaken to understand the impacts on heritage/landscape. This issue is complicated by changes to the NPPF between 2023 and 2024 (transitional arrangements state that the plan should be examined under the 2023 NPPF). The 2023 NPPF requires us to consider identifying areas as being suitable for wind energy to be shown on the policy map. Applications could then only come forward within those areas, however the 2024 NPPF removed this limitation making identifying such areas less important.</p> | |
| <p>Transport National Highways and Devon County Council highlighted the need for transport evidence, in particular regarding highways capacity for West End developments (including employment and New Community).</p> | <p>This evidence is being produced.</p> |
| <p>New Community Devon County Council raised concerns about the absence of some detail around proposals for the new community and supporting evidence.</p> | <p>This is being produced.</p> |
| <p>Health Care The NHS has identified a lack of capacity in primary health care in the west of East Devon.</p> | <p>Explore issue with NHS and resolve through the Infrastructure Delivery Plan.</p> |
| <p>Water Quality The Environment Agency require additional evidence to understand the potential impact of additional housing on water quality.</p> | <p>The water cycle study will provide evidence and additional policy/ policy wording may be required.</p> |
| <p>Heritage The potential of several sites to result in significant harm to heritage assets, including listed buildings and Scheduled Ancient Monuments, was raised by Historic England and Devon County Council. Although the site allocation work previously undertaken highlighted the potential impacts and policy required the issues to be addressed through the development management process, Historic England and DCC are clear that, in some cases, the work must be carried out before allocation.</p> | <p>Additional heritage impact assessments are being undertaken, and, in some cases, site promoters have been advised that additional archaeological investigation works are required.</p> |
| <p>Flood Risk The Environment Agency highlighted allocations that require a 'level 2' Strategic Flood Risk Assessment.</p> | <p>This work is being undertaken.</p> |

5.5 A large number of comments and objections to the plan were in respect of sites allocated for development. At this stage of plan making it is **not** considered that a substantive review of whether sites should be removed from the plan and not shown as allocations is appropriate. Whilst appreciating many sites saw objections made, the Council did go through a comprehensive and logical exercise in reaching allocation choices. It should also be noted that, if sites were to come out of the plan in a

substantive way with anything more than minor impacts, new sites would need to be added (or other ways found) to make up housing shortfalls and the expectation is that this would delay plan production.

- 5.6 There were a very small number of cases, specifically for sites allocated for employment uses, where technical objections made were of a nature that would warrant serious consideration of site deletion (but in such cases deletion would not have significant impacts in terms of meeting minimum development requirements).
- 5.7 For some sites where there were objections, specifically from statutory bodies raising technical points of concern, it is considered that further work should be undertaken to see if these concerns can be overcome. We would seek to achieve this through additional technical evidence gathering and/or through policy changes (the expectation being of changes to policy wording rather than boundary changes to allocations – for example making it clear, or clearer, where there maybe areas of constraint on certain parts of site that would, for example, not be acceptable for built development – for example because of adverse heritage impacts that development might result in).
- 5.8 Several allocated sites are located in close proximity to Scheduled Monuments and Historic England and the DCC Archaeologist have advised that technical assessments (geophysical surveys and investigative trenching) should be undertaken prior to allocation so that their importance, setting, and likely extent are more fully understood. They would not support allocation of these sites without satisfactory technical assessment. This would inform the layout of development and ensure that subterranean remains and their settings are protected (they could, for example, be used as public open space or for informal recreation or wildlife) and policy wording would be reflect these requirements. We would still require a programme of works and recording of finds to be agreed through planning conditions. Housing site promoters have been asked to provide this further technical information. This issue affects 477 dwellings on two allocations, and 3.6ha of employment land, but it may be possible to achieve site layouts that retain this capacity whilst preserving the heritage assets.
- 5.9 Historic England and/or the Devon County Council Archaeologist have also objected to an employment site and one other site due to their potential impact on ancient monuments (parts of the monuments are believed to overlap the sites). These sites are relatively small and are subject to other technical constraints (for example, flooding and highway safety), and there is sufficient headroom in the total amount of land to be provided, that these sites could be deleted without creating a shortfall.
- 5.10 Supporting technical information has been submitted by some site promoters (or has been requested) and this is being reviewed by the Council's Conservation Team as part of further heritage impact assessment work on these sites. It is anticipated that in most (if not all) cases, harm can be minimised through detailed site layouts, careful design and landscaping within the allocated sites. This is likely to require changes to policy wording.
- 5.11 Since starting the site assessment work the legislation relating to National Landscapes has introduced a new duty for planning authorities to 'seek to further' the statutory

purposes of protected landscapes (conserving and enhancing their natural beauty) and several statutory consultees have objected on the basis that it is not clear how the Local Plan strategy and site allocations comply with this duty. In response to this, a topic paper is being produced alongside further site assessment work that specifically considers how development of sites within, adjoining, and affecting the setting of, National Landscapes can further their purposes. Opportunities to conserve and enhance the wider National Landscape are also identified. It is clear that the measures required will be individual to each site, but at this stage the assessment work suggests that careful design, layout and reinstatement of historic natural features will assist in meeting the duty and most (if not all sites) will be retained as allocations, albeit with amended policy wording setting out the works required in more detail.

- 5.12 We would envisage that any further assessment work on or related to sites would be published as addendums to the technical site assessment work/settlement specific reports that have already been published. In some cases site capacity levels in policy may need to or have scope to change. This maybe especially so for housing with some allocation sites, given constraints, potentially having only reasonable capacity for lower development levels than those referenced in the initial regulation 19 plan, but with some offering scope for greater capacity.

6 Further evidence gathering and studies

- 6.1 In the initial Regulation 19 consultation we noted that a number of evidence documents were to follow. We set out summary details below of key ongoing evidence work, in addition to matters already highlighted in this report, that will support the plan as it progresses.
- 6.2 **New community masterplan work** – local plan policy for the new community will need to be refined through on-going assessment and master planning work. Consultants are continuing to refine proposals for the new community with a masterplan to be finalised in the coming weeks. This masterplan will form a key piece of evidence to show how local plan policy can be implemented and as such will be critical to refinement (but unlikely to lead to wholesale changes) of existing policy. Whilst in some cases going beyond the strict requirements for justifying local plan policy there is a raft of related new community work that is also progressing, this includes:
- a) **Delivery vehicle assessment** – committee will be aware of work examining delivery vehicle options for the new community, with a particular focus on potential for creation of a development corporation to lead on such work. A report is also being prepared for Cabinet in July to consider potential delivery vehicle options for the new community and to include details of a strategic outline business case for a delivery vehicle. Decisions reached may be referenced or reflected on in the local plan and consultation materials.
 - b) **New towns programme submission** – committee will be aware that the council has made a submission under, and to be part of, the government's new town programme. A successful outcome could see financial, technical and wider

support to help deliver the new community. A decision from government is not expected until after the summer recess.

- c) **New town financial assessment and viability work** – this work will specifically look at viability matters at the new town, informing, amongst other considerations, the mix of uses that can be achieved, scales and rates of planned delivery, delivery of (and need for) social and community facilities and levels and provision of affordable housing.
- d) **Infrastructure delivery plan** – the new community will need to be supported by an Infrastructure delivery plan that needs to be produced. This will dovetail with or potentially merge with a plan wide Infrastructure delivery plan which already exists but which we will look to refine.

- 6.3 **Greater Exeter Transport Study** – in cooperation with neighbouring local authorities, and working with and through Devon County Council, we have commissioned consultants WSP to assess and review transport impacts arising from local plan proposals, including the New Community. This work is especially concerned with impacts on the strategic road network, as managed by National Highways (who are also a key partner in this work). The key roads, and especially junctions on to and off these roads, being the M5 motorway and the A30.
- 6.4 There are specific concerns relating to the capacity of junctions on the western edges of our district, specifically M5 J29 and J30, the A30 Airport Roundabout, and Clyst St Mary Roundabout. Whilst some capacity enhancement may be possible through modest physical improvements, the emerging assessment outputs point to a far greater emphasis on the need for green travel and movement solutions at the New Community in particular – more and better public transport and an emphasis on more walking and cycling, reducing the need to travel, co-locating new homes with places of work and social and community facilities, greater home working and actions that would help spread the load of travel more evenly throughout the day.
- 6.5 This higher level assessment also inter-relates to and with new community specific work on travel, accessibility and movement that is informing masterplan work. Specific work on a transport ‘vision and validate’ approach is also underway for the new community. The consultant’s work is scheduled to reach final conclusions and outputs in late July/early August. Interim findings have and will come out sooner and in emerging form will help inform and refine any potential local plan changes.
- 6.6 **Water cycle study** – officers have met with consultants Haskoning (formerly called Royal Haskoning) on the work and steps needed for completion of the water cycle study. It is hoped that a brief for this further work will be agreed shortly with a final study and outputs to be produced in time for the second Reg 19 consultation in October. The work is to remodel impacts on capacity in response to local plan allocations as well reconciling data from different sources. The work will be undertaken in liaison with inputs from the Environment Agency and amongst other outputs will help refinement of plan policy noting, for example where sewage infrastructure

improvements are needed and where corresponding phasing of development is appropriate, so as to align with any required or planned works.

- 6.7 **Strategic flood risk assessment** – there is some limited work to be completed on strategic flood risk matters. This includes a review of a very small number of sites that are allocated in the plan that have not been fully assessed. This work will be completed in summer 2025 and we will highlight to committee, in due course, if the work generates any policy concerns. Though even if it does mean, for example, that some allocations cannot be carried forward, it would not undermine the overall plan and the plan strategy.
- 6.8 **Pebblebed Heaths - Air quality assessment and mitigation strategy** – the need for this work was highlighted in Habitat Regulation Assessment and in due course will need to feed back into the Habitat Regulation Assessment. The work is specifically concerned with vehicle exhaust emissions, specifically nitrogen deposition, on the Pebblebed Heaths, and increases that will arise on account of new development. A key output will be to establish means, nature and projects to secure mitigation. Consultants – Ricardo Ltd – have been appointed to undertake the work and their final conclusions and final recommendations are scheduled to be out in October 2025. Early outputs from the work will, however, help refine, if needed, plan policy wording.
- 6.9 **Housing needs assessment** – Government policy specifically requires up to date housing needs assessment evidence. We have, therefore, re-commissioned ORS to do an update of their earlier work. This will be concluded in mid-2025.
- 6.10 Whilst we major on the above, we will also be doing or commissioning further work and especially updates – to include Habitat Regulation Assessment update and further Sustainability Appraisal work. There may also be need or scope to consider updates to such work as the plan viability assessment.

7 **Duty to Cooperate and Statements of common ground**

- 7.1 A matter of great relevance to plan making, as highlighted in some comments on the plan, is the need to meet Duty to Cooperate requirements. This is a legal plan making requirement to ensure local planning authorities and county councils cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. It comes into particular affect where such bodies have or may raise objections to a plan.
- 7.2 Whilst we do have some objections from such bodies on the 1st round of Regulation 19 consultation, we would hope that many could be resolved through plan changes or through setting out statements of common ground that clarify what we agree on and what we do not agree on and why and potentially setting out justification for differences (if appropriate).
- 7.3 The first thing that the inspector/s appointed to examine our plan will consider is whether we have met our duty to co-operate and, if it is found that we have not, the plan will not progress to examination of soundness. It is therefore vital that we actively

consider any issues raised under the duty to co-operate to establish whether agreement can be reached.

- 7.4 Discussions about meeting the housing requirement of other local planning authorities is an issue that has been raised in other local plans and some plans have failed to meet the duty to co-operate on these grounds. Through the Regulation 19 consultation, Torbay requested that East Devon help to meet their housing requirement and Mid Devon, Somerset, and Dorset said that they did not yet know whether they would be able to meet their housing requirement. Given the physical separation between Torbay and East Devon, it would (we would suggest) be difficult for Torbay to justify how the provision of additional housing within East Devon could meet the Torbay housing requirement. Furthermore, the environmental and other constraints of building additional housing in East Devon, rather than in or closer to Torbay, to meet a Torbay requirement would need to be properly investigated, considered and justified. However, it is relevant to note that the submission Teignbridge Local [Plan](#), which borders Torbay, included a policy (H1) on meeting possible unmet housing needs from neighbouring authorities, but the Inspectors advice was that it would be better to include explanatory text to explain that, in the event of housing not being delivered in accordance with the plan, or if the identified needs for new homes were to change, the requirements of legislation and national policy/guidance in respect of the need for a review/update of the plan would be followed. This is considered to be an appropriate means of dealing with the uncertainty of whether other local plans will be able to meet their housing requirement and it has the benefit of being suggested as a way of meeting a similar situation in a recently examined plan. Consideration will be given to whether including additional text to the local plan would deal with this issue adequately.
- 7.5 Duty to co-operate matters that have arisen through plan preparation are set out briefly in the table below. We are currently working on statements of common ground focussed on the topics listed so that they can be published alongside the second Reg.19 consultation.

| Topic | Issue | Summary Notes |
|------------|------------------------------------|---|
| 1A Housing | Meeting the East Devon requirement | Reg.19 plan and supporting evidence show how this can be achieved. |
| 1B Housing | Meeting Exeter requirement | Plan is at Regulation 19 and meets Exeter's housing requirement. No request made for East Devon to meet need. |
| 1C Housing | Meeting Teignbridge requirement | Plan is nearing adoption and meets the Teignbridge requirement. |
| 1D Housing | Meeting Mid Devon requirement | Too early in plan making to know if Mid Devon can meet its own requirement. |
| 1E Housing | Meeting Somerset requirement | Too early in plan making to know if Somerset can meet its own requirement. |
| 1F Housing | Meeting Dorset requirement | Dorset plan is at Regulation 18, and it is not known whether it can meet the Dorset housing requirement. |
| 1G Housing | Meeting Torbay requirement | In the Regulation 19 consultation Torbay requested that East Devon help to meet its housing need. |

| Topic | Issue | Summary Notes |
|-----------------------|---|--|
| 1H Housing | Meeting the Gypsy and Traveller requirement | Joint evidence on permanent pitches with Exeter, Mid Devon and Teignbridge. Ongoing joint work on need for transit site/s. |
| 2A Climate change | Mitigation | Joint work with Devon CC, Mid Devon and Exeter that informs policies of plan. Detailed recommendations from Environment Agency on Reg.19 policies to be considered for inclusion in second Reg. 19 plan. |
| 2B Climate change | Adaptation | Substantive comments from the Environment Agency on the Reg. 18 plan were incorporated into the first Reg. 19 plan. Further, more detailed, suggestions on the first Reg. 19 plan to be considered for inclusion in second Reg. 19 plan. |
| 3A Employment | Meeting East Devon needs | Reg.19 plan and supporting evidence show how this can be achieved. |
| 3B Employment | Meeting the needs of others | There are questions as to whether the Exeter plan relies on provision of employment land outside of the city boundary. |
| 4A Transport | 'Greater Exeter' strategy | Further work is being undertaken with Highways England, Devon CC and other councils to understand the capacity of the transport network to accommodate growth levels. |
| 4B Transport | Rail improvements | Improvements to the frequency of the Exeter Waterloo line are supported through plan policy. |
| 4C Transport | Walking and cycling improvements | The Clyst Valley and New Communities Local Cycling and Walking Infrastructure Plan being prepared by Devon CC is supported through plan policy. |
| 5A Water quality | River Axe catchment | Work on implementing mitigation measures is ongoing. |
| 5B Water quality | River Exe catchment | At the Reg. 18 stage the Environment Agency highlighted potential impacts from cumulative growth projections in East Devon, Exeter and Mid Devon on the Exe Estuary Special Protection Area. No specific comments on the River Axe were submitted at Reg.19. |
| 5C Water quality | Improving all East Devon water bodies | Work is ongoing with Natural England and other councils in Devon to improve our natural environment, including water quality. This is supported through plan policy but could be strengthened by policy additions. |
| 5D Water quality | Impact of increased housing numbers | This is being assessed through the water cycle study. |
| 6A Biodiversity | Nature recovery | There is a pipeline of biodiversity net gain delivery that can accommodate the planned level of growth. |
| 7A Habitat mitigation | In combination impacts of proposed development on Exe Estuary SPA and | Work is ongoing but the mitigation strategy work started through the adopted local plan addresses the impacts identified. |

| Topic | Issue | Summary Notes |
|---------------------------|--|---|
| | Pebblebed Heaths SAC | |
| 7B Habitat mitigation | Air pollution from increased traffic on Pebblebed Heaths SAC | Work is ongoing on understanding the issue and addressing impacts. |
| 8A Landscape and seascape | Impact of windfarms | Work is ongoing on whether this issue could be resolved through policy wording and changes to the policy map – see table in Section 5 of this report. |
| 9A Site allocations | New community | Work on this is ongoing. |
| 9B Site allocations | Land north of Topsham | Policy WS10 provides for joint work with Exeter City Council on a Development and Infrastructure Delivery Framework to ensure development and infrastructure needs are coordinated. |

8 Proposed timetable and format for consultation

8.1 In response to the matters raised in this committee report we have now drafted a revised detailed plan making timetable to get to Submission of the local plan for Examination. Key steps ahead, noting timings for committee meetings are:

- Study and assessment work by officers and appointed consultants – ongoing through the summer – with interim findings on most work coming through in July 2025 and final outputs in September and October 2025.
- Officers to complete first redraft of the local plan by mid August 2025.
- Committee to receive 1st redrafted local plan in September 2025. The aim will be for this to be at the scheduled 2 September meeting, but a special or extra meeting or meetings may need to be held or be seen as appropriate. It should be noted that we would aim to make this 1st redraft also the final redraft, but would see merit it having the contingency/flexibility to refine to a 2nd version if needed.
- In September or October committee will be asked to endorse the local plan for the 2nd round of Regulation 19 consultation. This is under council constitution [constitution-may-2025.pdf](#) Para 2.7.4 item (d).
- On the basis of the above we would envisage the 2nd round of Regulation 19 consultation running from October 2025 into November 2025. Precise dates are to be determined, and these would need to be informed by such matters as all evidence and supporting documents being completed and published at or before consultation start.
- In December 2025 through to January 2026 we would ideally hope to be able to assess and review all representations received. But we would stress that a key

determinant of achieving this will be the number and complexity of such submissions. If high levels (or complexity) of submissions are submitted then this timetabling may not be possible. But, if achievable, noting deadlines are tight, it would allow for a feedback report to go to Strategic Planning Committee in late January 2026 with a recommendation to go to Council for the plan to be submitted for Examination at a provisionally scheduled Council meeting of 18 February 2026. We would though stress that tightness of deadlines is such that, working to provisionally scheduled Council meeting dates, a report going to Council on 15 April 2026 looks more realistic. It should be noted that the Council constitution, Para 2.7.4, item (B) sets out that it is for Council to determine submission for Examination. We would need to align whatever Council meeting the plan goes to with a prior Strategic Planning Committee that would need to make a recommendation to Council.

- Plan Examination starts at the point of Submission. Assuming the plan progresses through examination at some point/s the appointed inspector or inspectors (it's now increasingly common for more than one to be appointed) will hold one or more sets of oral hearing sessions. We should also work on the basis that the inspector/s will require Main Modifications to the plan for it to be found sound. These modifications will need to be consulted on and for nearly all plans there are such modifications.
- Plan adoption will follow, subject to the inspector/s advising of acceptability, this may be expected in 2027. Depending on when in 2027 the plan is adopted will effect whether the plan has a life span of at least 15 years which is an expectation of the guidance at the point of adoption. There is a risk that the plan does not show 15 years which could be mitigated by adding an extra year to the life of the plan. However, this would require us to identify a further years housing land supply. Options for addressing this issue are currently being evaluated and will be reported on at a future meeting.

9.2 In our timetabling we need to be aware that we are progressing under transitional arrangements as set out in the 2024 version of the NPPF. Our understanding of these arrangements is that we have up until December 2026 to submit the plan for Examination. It is also worth highlighting that under the transitional arrangements the plan will be examined under the wording of the 2023 NPPF. Though doing so will generate some quirks and oddities, including where legislation may make some provisions of the 2023 NPPF redundant or not acceptable for use/application – an example of this is that the definition of “Traveller” has changed in the 2024 NPPF and our policies apply this new definition to ensure that the Plan complies with the Equalities Act and recent case law.

9 The format of the 2nd Regulation 19 Local Plan and consultation process

9.1 We would aspire to have as few changes as reasonably possible and credible in the amended version of the local plan. Any further changes should address soundness issues raised through the consultation only if possible. Where changes are made, in

papers to committee and in the consultation document, we would plan to show these as tracked changes (new text underlined and deleted text struck through).

- 9.2 For the consultation document it may well be that we number or otherwise denote changes and that we are seeking respondents to comment on the changes only and not revisit matters that are not amended from the original consultation document. We will need to submit comments received from both the 1st and 2nd rounds of consultation to the Planning Inspectorate for examination.
- 9.3 We would recommend that this second round of consultation on the plan is similar to the first, with material published on the Commonplace platform, which we will encourage people to use. We would also suggest minimising changes to the Policies Map (the mapping that shows, for example, sites that are allocated for development). But if or where changes are made we will need to determine the best way of illustrating these, so it is clear to respondents or interested parties where original lines or boundaries fell and where any new ones are located (if amendments have occurred).

10 Relationship with Neighbourhood Plans

- 10.1 Members should note that as we move forward with the new Local Plan, emerging neighbourhood plans will continue to be examined primarily for their general conformity with the adopted Local Plan (2013-2031), until such time as the new Local Plan is at least at Main Modifications stage. However, the relationship with the emerging Local Plan, as it progresses into these later stages of plan production, is increasingly relevant. Greater surety of its final content, as well as access to the complete set of supporting evidence documents, will provide a firmer basis for communities wanting to consider preparing a new or revised neighbourhood plan.

Financial implications:

This report sets the scene for the next steps in the Local Plan and the work which is being/will need to be commission, which falls within existing budgets. (AB/24/06/2025)

Legal implications:

There are no direct legal implications identified within this report (002533/24 June 2025/DH).