

Report to: Strategic Planning Committee

Date of Meeting 14 July 2026

Heading/Title: Response to consultation on the Mid Devon local plan

Cabinet Member(s): Cllr Todd Olive

Director/Assistant Director: Andrew Wood / Ed Freeman

Author and Directorate: Ed Freeman, Place Directorate

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Key decision: No

If a Key Decision has it appeared on Forward Plan: Not applicable

Document classification: Part A Public Document

Exemption applied: None

1. Background

- 1.1 Mid Devon District Council have started consultation to inform a new local plan for the district, they are calling the plan "Plan Mid Devon".
- 1.2 Plan Mid Devon is being made under the new plan making system, for more information see: [Create or update a local plan using the new system - GOV.UK](#). In contrast it is highlighted that in East Devon our local plan is being progressed under the old 'legacy' system. The new system is designed to be quicker and simpler than the old with a government expectation that plans will be completed in a 30-month time period. Under the new system there is an expectation of reliance being placed on policies set out in a new National Planning Policy Framework, a draft of which has been consulted on, and we are advised of formal publication later this year. The exclusion of detailed policies in a local plan, with a reliance on national policy, is one factor that is designed to speed up production.
- 1.3 Very importantly plans made under the new system will, however, include land that is allocated for development. But, noting that assessing potential sites and agreeing to allocations can prove to be a long and complex job in its own right.
- 1.4 Under the new local plan making system Mid Devon District Council have issued what is called – 'Plan Mid Devon - Notice of Scoping Consultation' - [Appendix 4 Notice of scoping consultation May 2026.pdf](#) . This is a short and succinct document that includes a section on 'likely contents' for the plan and 'Possible

contents'. These sections list broad headline subject matters – such as, under the 'likely contents':

- “ • *Plan period 2026 – 2046*
- *Introduction to Mid Devon*
- *Vision, objectives, measurable outcomes and spatial strategy*
- *Roles and functions of settlements*
- *Town centre hierarchy and extents*
- *Overall housing (including Gypsy and Traveller), employment and other development targets and a housing trajectory,”* etc.

- 1.5 By clear design and intent the consultation, as reflected in the new plan making system, does not give an indication of what the plan may, or may not, seek to do in respect of these subject matters or how it may approach or consider them and much less give an indication of specific policies or areas, locations or sites for development. Rather, the consultation is focussed on whether these are the right subject matters or headings for the plan and policy within to address. Notwithstanding this point there is the very strong likelihood that some responding to the consultation will advise on specific policy matters and policy intent (if not actual wording) they would like to see included. And perhaps more so advise on land and sites they would like to see allocated for development. This would be especially so from a prospective developers perspective, maybe in contrast and from a non-developer's perspective, land areas that are not considered suitable for development will also be identified. There may well also be views expressed on such matters as to how many new houses or other development types should be planned for (potentially with some higher and some lower suggestions).
- 1.6 In making comment on the Plan Mid Devon consultation the response that officers of this council suggest is submitted goes to some degree into the territory of potential plan policy detail, but only on major issues. We say little about matters the plan might seek to cover, we suggest it would be reasonable for Mid Devon District Council to determine such matters.
- 1.7 It should be noted that the consultation formally closes on 10 July 2026, but this report is scheduled for Committee on 14 July 2026. We will draw this report to the attention of officers at Mid Devon District Council on or prior to 10 July 2026 advising that this is (just) an officer report and as such does not constitute a formal representation of our Council, but that we will forward any final agreed representation on or soon after the 14 July 2026.
- 1.8 The Mid Devon plan consultation contains a comments form [Contact Form and Scoping Survey | Let's Talk Mid Devon](#) with nine questions, the first seven are about contact information and details that we will complete appropriately. Questions eight and nine are set out below with a proposed response for submission drawn up by officers in the boxed text. The recommendation seeks committee endorsement for submission.

8. Please provide any comments on what Plan Mid Devon should contain. The Notice of Scoping Consultation includes a list of potential contents of Plan Mid Devon, separated in to contents that are likely to be in the plan, and those which may

be in the plan (these can be found on pages 5, 6 and 7 of the Notice of Scoping Consultation).

East Devon District Council welcomes the opportunity to comment on the 'Plan Mid Devon – Notice of Scoping Consultation'. It is a positive and forward looking stance that Mid Devon District Council, through a new plan, are planning for the future. Albeit we do recognise that under current central Government plans for the reorganisation of local government (assuming these progress as currently timetabled) the plan will be up for adoption by a new superseding unitary local authority that is likely to cover parts, if not all of both East Devon and Mid-Devon. On account of this we do see a particularly strong need for the shared interests across our communities to be carefully and appropriately planned for in a co-ordinated way over the years ahead. On going engagement through plan making work is therefore essential.

At this stage we do not seek to highlight specific actions and detailed lists of policy choices that should feature in Plan Mid Devon, but rather we highlight the major matters where the plan and ultimately proposals within may impact on East Devon, and wider areas.

We do **not** highlight any specific concerns in respect of the matters listed under bullet pointed items headed 'likely contents'. These all seem reasonable and appropriate matters for consideration in the plan. Though we will note with interest how you may address the matters highlighted under the bold bullet point titled 'Development management policies/requirements as permitted or required by the NPPF'. You will no doubt review, but we wonder if and how far it may be appropriate to deviate or expand on subject matters that national policy may adequately address, though deviation where national policy may be inappropriate in a local context can be justified.

The considerations detailed above also apply to the somewhat less explicitly defined heading of 'possible contents' and the bullet pointed items listed below it. Efficiency in plan making could render some of the listed areas as potentially better addressed through supplementary guidance.

Of greatest importance, in preparation of the plan, we would encourage early and on-going dialogue in respect of potential development proposals, especially if of a large or strategic scale, that lie close to the East Devon boundary or that could otherwise have impacts on East Devon.

We note that strategic scale growth is proposed in your current local plan [Adopted Local Plan and Policies Maps - MIDDEVON.GOV.UK](#) at Cullompton and at its nearest this will see development within a few hundred metres of East Devon on the eastern side of the town. Policies CU7 to CU12 of your existing plan set out the scale and nature of proposals and under these policies development can be readily expected to have wider impacts, some potentially negative, but we should actively plan for joint positive outcomes. We assume these broad proposals will roll forward into your new plan, though we trust with scope for appropriate refinement of approach.

We also look forward to engaging with over how or whether the mixed use 71 hectare employment, leisure, recreation proposals in your current local plan at Junction 27 of the M5 motorway, under Policy J27, should be carried forward into the new plan. This development is comparatively remote from larger centres of population and is likely to generate a high degree of car dependency in terms of access. The 6 hectares of land, in particular, to accommodate the Outlet Shopping Village is substantial in scale and we consider that the impacts on existing town centres and their retail and wider social and economic functions would benefit from revisiting. Furthermore, we would query whether there is an appropriate and reasonable market appetite for such development in the current economic climate.

Elsewhere in Mid Devon and for your plan, specifically at this stage, we make no further comment, other than to note that through joint working we should be considering shared and strategic infrastructure considerations and overall collective impacts and benefits of anything proposals within the plan.

9. Are there any other matters which you would like to comment on in relation to Plan Mid Devon?

At this stage East Devon District Council would not wish to raise any other matters other than to wish you well in plan making.

2. Recommendations/Decision

2.1 That Strategic Planning Committee endorse the officer recommended response to the Plan Mid Devon consultation and agree to submission of these comments.

3. Reasons for Recommendations/Decision

3.1 The recommendation will ensure the views of the Strategic Planning Committee of East Devon District Council are formally submitted to Mid Devon District Council and therefore the interests of our council are represented.

4. Options

4.1 East Devon District Council could choose to not comment on the Plan Mid Devon consultation or could provide alternative different comments.

5. Relevance to Council Plan/priorities

Set out how report links to the Council Plan/priorities:

- A supported and engaged community that has the right homes in the right places, with appropriate infrastructure

Commenting on the Mid Devon plan	None	None	1	1	1	Not applicable	None, at this stage
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*Impact – Major = 4 Serious = 3 Significant = 2 Minor = 1

*Likelihood – Very Likely = 4 Likely = 3 Unlikely = 2 Remote = 1

9. Equality Implications (Public Sector Equality Duty)

9.1 This relevance assessment aims to analyse gathered information for potential relevance to equality. If a Full Equality Impact Assessment is required ([Equality analysis impact assessment form](#)), include it as an appendix. At the minimum, the following table must be completed.

Scope (<i>Provide an overview, including objectives and desired outcomes</i>)	Commenting on the Mid Devon plan and people that may ultimately be impacted by the plan.
Evidence gathered and engagement (<i>List stakeholders consulted and relevant processes, policies, and data sources</i>)	None – in commenting on the consultation, in broad terms, it is not considered that evidence gathering and engagement is currently needed.
Relevance assessment findings (<i>If relevant to equality, undertake a full EIA or If no relevance to equality, explain why with supporting information</i>)	A full EIA is required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, this assessment has demonstrated relevance to equality with regard to: Please check relevant boxes <input type="checkbox"/> Age <input type="checkbox"/> Pregnancy and maternity <input type="checkbox"/> Disability <input type="checkbox"/> Sexual orientation <input type="checkbox"/> Race <input type="checkbox"/> Gender reassignment <input type="checkbox"/> Sex <input type="checkbox"/> Marriage or Civil Partnership <input type="checkbox"/> Religion or Belief <input type="checkbox"/> Armed Forces <input type="checkbox"/> Other, e.g. carers, care leavers, low income, rurality/isolation, etc. If no, explain why: In due course the Mid Devon plan could impact on any of the above, and comment made by our Council may have direct relevance, but at this stage of work no potential impact considerations are identified.
Relevance ranking	<input type="checkbox"/> High – Very relevant to protected characteristics <input type="checkbox"/> Medium – Somewhat relevant to protected characteristics <input checked="" type="checkbox"/> Low – Not relevant to protected characteristics
Key findings and impacts	
Conclusion drawn (<i>i.e No major changes needed; EIA found no negative impact or adjust policy/process to remove identified barriers</i>)	None

Actions (<i>Proposed actions to mitigate negative impacts on identified groups</i>)	None
Signed off by	Ed Freeman

10. HR and Workforce Implications

10.1 No work force implications are identified.

11. Community Safety Implications (Crime and Disorder)

11.1 No Community Safety Implications are identified.

12. Climate Change Implications

12.1 At this stage of plan making no specific climate change matters that could arise are specifically identified.

13. Health & Safety and Health & Wellbeing Implications

13.1 No Health & Safety implications and no Health & Wellbeing Implications are at this stage identified.

14. Procurement and Social Value implications

14.1 No procurement and Social Value implications are identified, at this stage.

15. Land and Buildings (non-housing)/Asset Management Implications

15.1 No issues or implications are identified.

16. Overview and Scrutiny Committees Comments/Recommendations

16.1 No advice or comment has been sought from these committees.

17. Digital and Data

17.1 No digital and data implications have been identified.

18. Consultation and Engagement

18.1 In drawing up recommendations for comment on the Mid Devon plan no consultation or engagement has taken place.

19. Communications

19.1 No PR or comms implications have been identified.

20. Next Steps

20.1 If the recommendations to Strategic Planning Committee are agreed with they will be submitted to Mid Devon District Council. If an alternative is agreed, then that will be submitted or if it is determined that nothing should be submitted then nothing will be submitted.

21. Appendices

21.1 There are no appendices to the report.

22. Background Papers

22.1 Background papers, of relevance, are shown with web links in the report.

Proposed Report Sign Off process

Please make sure you have obtained the relevant sign off and the date completed before submitting your report to Democratic Services.

	Officer Name	Date requested	Date Completed
Legal & Governance	Monitoring Officer or Deputy Monitoring Officer		25/06/2026
Finance	Section 151 Officer or Deputy S151 Officer		22/06/2026
Communications	communications@eastdevon.gov.uk		If applicable
Digital and Data	digital@eastdevon.gov.uk		If applicable
Engagement	engagement@eastdevon.gov.uk		If applicable
HR	HR Lead		If applicable
Chief Executive	Chief Executive		If applicable
Director	Relevant Director		Required
Assistant Director(s)	Relevant Assistant Director(s)		Required
Cabinet Lead Member(s)	Relevant Lead Member (s)		Required
Executive Leadership Team	ELT	Insert date approved by ELT	Required
Strategic Leadership Team	SLT		If applicable