



The Planning Inspectorate

Report to East Devon District Council

by **Beverley Doward BSc BTP MRTPI**

an Inspector appointed by the Secretary of State

Date: 17 May 2018

Planning and Compulsory Purchase Act 2004
(as amended)
Section 20

REPORT ON THE EXAMINATION OF THE EAST DEVON VILLAGES PLAN

The Plan was submitted for examination on 28 June 2017

The examination hearings were held between 7 and 8 November 2017

File Ref: PINS/U1105/429/7

Abbreviations used in this report

BUAB	Built-up Area Boundary
DtC	Duty to Co-operate
EDLP	East Devon Local Plan
EDVP	East Devon Villages Plan
Framework	National Planning Policy Framework
LDS	Local Development Scheme
MM	Main Modification
NP	Neighbourhood Plan
SA	Sustainability Appraisal
SCI	Statement of Community Involvement

Non-Technical Summary

This report concludes that the East Devon Villages Plan provides an appropriate basis for the planning of the East Devon District provided that a number of main modifications (MMs) are made to it. East Devon District Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The Council's Strategic Planning Committee formally considered the MMs on 14 December 2017. It resolved to consult upon the MMs and updated sustainability appraisal but also to submit a request during the consultation period for an amendment to two of the MMs which relate to Greendale Business Park and Hill Barton Business Park. I considered this submission along with all the other representations made in response to the consultation on the MMs.

The MMs were subject to public consultation for a period of seven weeks from 18 December 2017 until 2 February 2018. After considering all the representations made in response to the consultation on the MMs I have recommended their inclusion in the Plan. I have made an amendment to the detailed wording of one of the MMs for clarity and have corrected a typographical error to another.

In summary the Main Modifications:

- Provide a policy relating to the Built-up Area Boundaries that makes the relevant connection to the policies of the East Devon Local Plan.
- Ensure the scope of the Plan with regard to Greendale Business Park and Hill Barton Business Park is made clear and provide policies relating to the business parks that make the relevant connection to the policies of the East Devon Local Plan.
- Ensure that the historic environment within the villages of Kilmington and Musbury is properly considered in accordance with the advice in the National Planning Policy Framework.
- Amend the policies relating to Beer Village Centre Vitality and Colyton Town Centre Vitality to provide clarity and certainty as to how proposals for main town centre uses which are within the defined Built-up Area Boundaries but outside of the defined vitality and shopping areas will be considered.
- Include a monitoring framework.

Introduction

1. This report contains my assessment of the East Devon Villages Plan (EDVP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DtC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework) (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The EDVP¹, submitted in June 2017, is the basis for my examination. It is the same document that was published for consultation in March 2017.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM01**, **MM02**, **MM03** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The Council's Strategic Planning Committee formally considered the MMs on 14 December 2017. It resolved to consult upon the MMs and updated sustainability appraisal but also to submit a request during the consultation period for an amendment to two of the MMs which relate to Greendale Business Park and Hill Barton Business Park. I considered this submission along with all the other representations made in response to the consultation on the MMs.
5. The MMs were subject to public consultation for a period of seven weeks from 18 December 2017 until 2 February 2018. I have taken account of the consultation responses in coming to my conclusions in this report. I have made an amendment to the detailed wording of one of the MMs for clarity and have corrected a typographical error to another. These amendments do not significantly alter the content of the modifications as published for consultation or undermine the participatory processes and sustainability appraisal that has been undertaken.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies

¹ Submission and Evidence Base Document Ref: VP01

map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Built-up Area Boundaries (BUABs) and the Greendale Business Park and Hill Barton Business Park inset maps as set out in the submitted EDVP.

7. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. Where any consequential changes or corrections are required to the Policies Map these were published for consultation alongside the MMs.

Assessment of the Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
9. In relation to the DtC, the EDVP is not a strategic planning document and does not make provision for development that could be regarded as a strategic matter as defined in the 2004 Act. The East Devon Local Plan 2013-2031 (EDLP), adopted in January 2016, sets the strategic context for the EDVP. Accordingly, within this context I consider that there are no strategic matters included in the EDVP.
10. The East Devon Villages Plan Consultation Statement² indicates that with the exception of Uplyme, the EDVP covers settlements that are not located close to the boundaries of East Devon and that in the case of Uplyme, which is on the boundary with the neighbouring local planning authority of West Dorset, the development outlined in the EDVP would not have a significant impact.
11. In view of the above considerations, overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background: the scope of the East Devon Villages Plan

12. The scope of the EDVP is derived from the EDLP and the Local Development Scheme (LDS). The EDLP indicates that a Village Development Plan Document will be produced separately from the main local plan document and that it will be concerned with development boundaries around villages, allocations of land for development at these villages and other policies that may be applicable at, or for villages. It includes a policy (Strategy 6) which states that BUABs will be defined in the Villages Development Plan Document and lists, in a policy (Strategy 27), the settlements for which BUABs will be defined. The EDLP also refers to the intention to prepare inset maps for the villages and the Greendale and Hill Barton Business Parks which will form part of the Village Development Plan.

² Submission and Evidence Base Document Ref: VP07A

13. The LDS July 2017³ indicates that the Villages Plan will be specifically concerned with development issues in and around key villages of East Devon and the town of Colyton and that it will also address Greendale and Hill Barton Business Parks.
14. In order to ensure the EDVP is positively prepared and effective it is recommended that text is included in the introduction of the Plan to ensure its scope with regard to Greendale and Hill Barton Business Parks is made clear at the outset (**MM01**).
15. A number of the representations received on the submitted EDVP relate to matters that are beyond its scope. My examination of the soundness of the EDVP is limited to whether it will be effective, positively prepared, justified and consistent with national policy in achieving its purpose having regard to its limited scope. It is not for me to re-examine issues that were covered in the examination of the EDLP which will remain extant, and there is no requirement, as part of this examination to consider the overall development strategy for East Devon, objectively assessed housing and employment need, the location of employment growth or specific allocations identified in the EDLP. These matters are beyond the scope of this Examination.

Main Issues

16. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified six main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness and legal compliance rather than responding to every point raised by representors.

Issue 1 - Whether or not the approach adopted in the EDVP, in conjunction with the EDLP, in relation to the BUABs is capable of effective implementation.

17. The EDVP seeks to provide a spatial element to policies contained in the EDLP by defining the BUABs of specific settlements. However, as submitted the Plan does not contain any specific policies relating to the BUABs. Whilst it is not unusual for the development plan of an area to comprise of several different documents and for decision makers to be required to look at the composite nature of the various development plan documents, the defined BUABs indicated on the inset maps in the EDVP are intended to provide a geographical illustration of policy as required by Regulation 9 (1) of the 2012 Regulations. In order to do so there must be a relevant policy in the plan being examined, in this case the EDVP, in order for it to comply with the Regulations and be legally compliant. If the Plan is not legally compliant it is not capable of effective implementation. Accordingly, it is necessary to include within the EDVP a new policy and supporting text (**MM02** and **MM03**) which relate to the BUABs and make the relevant connection to the policies of the EDLP.

³ Submission and Evidence Base Document Ref: VP31

Issue 2 - Whether the principle of defining BUABs for the villages is consistent with the development strategy of the EDLP and whether the approach taken to defining the BUABs is justified and consistent with the development strategy of the EDLP.

18. The development strategy of the EDLP focuses major growth in East Devon's West End. It also indicates that the seven main towns will act as focal points to serve their own needs and the needs of the surrounding rural areas and that development in the smaller towns, villages and rural areas will be geared to meeting local needs.
19. The EDLP indicates that BUABs are a fundamental policy tool for determining areas and locations that are appropriate, suitable and acceptable for development. It also indicates that the BUABs serve three primary functions by setting limits for the outward expansion of settlements and in so doing controlling the overall scale and location of development that occurs in order to ensure implementation of the plan strategy; preventing unregulated development across the countryside and open areas; and defining (within the boundary) locations where development, in principle, will be acceptable.
20. The principle of defining BUABs for the villages within the EDVP and the specific settlements for which BUABs would be defined were established through the EDLP. Strategy 6 of the adopted EDLP indicates that BUABs will be defined in the Villages Development Plan Document and Strategy 27 lists the settlements for which BUABs will be defined and specifically states that the BUABs for the small towns and larger villages will not have land specifically allocated for development. With the exception of Lympstone, the BUAB for which is defined in the Lympstone Neighbourhood Plan, the EDVP takes forward the commitments expressed in Strategy 6 and Strategy 27 of the EDLP. There is nothing in the evidence submitted to the examination of this Plan that leads me to conclude that there has been any change in circumstances since the adoption of the EDLP that would either justify the inclusion of any additional settlements to those indicated in Strategy 27 of the EDLP or the exclusion of any of those listed.
21. The general approach taken to defining the BUABs in the EDVP is based upon an assessment of sites against a set of criteria, developed and refined following consultation, and then a further assessment to take account of accessibility to local services and facilities other than by the use of a private car. The criteria were informed by the approach set out in Strategy 27 of the EDLP which indicates that the settlements will have BUABs but will not have land specifically allocated for development within them rather any such development should come forward through a Neighbourhood Plan (NP). The further assessment to take account of accessibility to local services and facilities is consistent with and justified by the evidence base that informed the identification of the settlements in Strategy 27 of the EDLP.
22. Having regard to all of the above therefore, I am satisfied that the principle of defining the BUABs for the villages is consistent with the development strategy of the EDLP and also that the approach taken to defining the BUABs is justified and consistent with the development strategy of the EDLP.

Issue 3 - Whether the criteria used to define the extent of the BUABs are effective so as to deliver the objectives for the villages as set out in the EDLP and whether the boundaries for the specific settlements are identified robustly in accordance with the criteria and having regard to the reasonable alternatives referenced in the Sustainability Appraisal (SA).

23. The vision for the villages is set out in the EDLP. It indicates that, along with the smaller towns and countryside, they should accommodate modest development and their objective, as set out in Strategy 1 of the EDLP, is that they should help to meet local needs. Whilst the EDLP indicates that BUABs are a fundamental policy tool for determining areas and locations that are appropriate, suitable and acceptable for development it also indicates, as detailed above, that the small towns and larger villages will not have land specifically allocated for development. The intention is that the provision of new housing in the villages should be left to the NP process thereby reflecting the Government's agenda to give neighbourhoods more ability to determine the shape of the places in which their inhabitants live. The criteria used to define the extent of the BUABs were informed by this approach and address the objectives of the EDLP by defining the core built-up areas of the villages where local services can be reached on foot.
24. I note the concerns expressed that the approach adopted in the EDVP is not consistent with the vision for the villages as set out in the EDLP which states that they should accommodate modest development and that it will not provide for the delivery of the housing numbers set out in the EDLP. However, I also note that in considering the approach advocated in Strategy 27 of the EDLP the examining Inspector found that given the number of dwellings allocated to small towns and villages that had already been built, were under construction or had planning permission, the number remaining to be delivered through Strategy 27 was relatively small compared with the overall target and that lack of delivery did not pose a significant threat to meeting the overall target for new housing in these settlements⁴. The evidence submitted to this examination indicates that this remains so. Furthermore, Strategies 6 and 7 of the EDLP provide local communities the flexibility to allocate land outside the BUABs through the NP process. Such an approach is entirely consistent with the Government's Localism agenda. Accordingly, I am satisfied that the approach taken to defining the BUABs in the EDVP is consistent with the vision for the villages set out in the EDLP and that the criteria used to define the extent of the BUABs are effective so as to deliver the objectives for the villages as set out in the EDLP.
25. The set of criteria used to guide the assessment of individual sites was developed and refined following consultation at the very start of the preparation of the EDVP in 2015. This was followed by initial site by site assessments which were the subject of consultation in 2016 and then further revised to take account of the consultation responses received and any change in circumstances. The revised site by site assessments⁵ provide details of the individual sites within each of the villages that were considered against the

⁴ Submission and Evidence Base Document Ref: VP28

⁵ Submission and Evidence Base Documents Ref: VP13 – VP26

criteria and the further assessment undertaken to take account of accessibility to local services and facilities. This process using a standard methodology has provided a consistent and transparent approach for defining the BUABs of the specific settlements.

26. Some concerns have been expressed that the BUABs for some of the settlements do not accord with the criteria and that the boundary should be amended to include specific sites. There is inevitably an element of subjectivity in considering individual sites against some of the criteria. However, after considering the representations made and having regard to the discussions at the Hearing session regarding the Council's assessment of specific sites, particularly in relation to the BUABs at Broadclyst, Clyst St Mary, Colyton, Feniton, Kilmington, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill and Woodbury I am satisfied that the BUABs for all of the specific settlements within the EDVP are identified robustly in accordance with the criteria and having regard to the reasonable alternatives in the SA.
27. In relation to the villages of Kilmington and Musbury, the inclusion of some specific sites within the BUABs, whilst according with the criteria, if developed, as noted in the SA, have the potential to impact upon the historic environment. Any such proposals will fall to be considered against the relevant policies of the EDLP. However, for clarity and in order to ensure that the historic environment within these two villages is properly considered in accordance with the advice in the Framework **MM06 and MM07** which relate respectively to Kilmington and Musbury are necessary.

Issue 4 - Whether the approach adopted in the EDVP to Greendale Business Park and Hill Barton Business Park is justified and consistent with the development strategy of the EDLP and is capable of effective implementation.

28. The development strategy of the EDLP, as indicated above, seeks to focus major growth, both residential and employment development, in East Devon's West End. In addition the seven main towns are intended to act as focal points to serve their own needs and those of the surrounding rural areas with the smaller towns, villages and rural areas geared to meeting local needs.
29. Greendale Business Park and Hill Barton Business Park do not fall within the 'West End' of the district or any of the seven main towns. They are not within the BUABs of any of the villages identified within the EDVP and are not the subject of site specific allocations in the EDLP. Rather, by virtue of the definition set out in Strategy 7 of the EDLP, the business parks lie within the countryside where development will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.
30. There is some dispute between the Council and others regarding the intent behind the main modification to policy E7 of the EDLP. This main modification resulted in the policy, which provides for the extension of established employment sites in urban and rural areas, specifically excluding its application to Greendale Business Park and Hill Barton Business Park. Some representors suggest that the business parks were excluded on the assumption that they would be specifically addressed by a policy in the EDVP.

However, the Council indicates that it was as a result of its concerns regarding the expansion of these two business parks in the countryside⁶. The Inspector's report on the examination of the EDLP⁷ does not comment specifically on this aspect of the main modification. Nevertheless, I note that the adopted EDLP includes no specific reference or intent to change, adjust or refine policy in respect of these two business parks. It indicates only that they will have their own inset maps which will form part of the Village Development Plan Document.

31. Greendale Business Park and Hill Barton Business Park have clearly made an important contribution to the supply of employment land within the district and provide valuable employment opportunities. However, I am also mindful that the Inspector examining the EDLP found that adequate provision was made in the Plan to meet the employment needs in the district. The EDLP provides the basis to support future employment development within East Devon. There is nothing in the evidence that has been submitted to the examination of this Plan that leads me to conclude that there is currently a need to provide for future employment development in locations other than those which have been tested and found sound through the examination of the EDLP.
32. The inclusion within the EDVP of a policy providing for future growth at Greendale Business Park and Hill Barton Business Park, whilst considered as a 'reasonable alternative' in the SA, is not supported by it and instead the option of not providing for further expansion of the business parks is identified as the preferred option. In addition the site by site assessment of land around the business parks⁸ indicates that there would be limited viable or desirable site choices to accommodate expansion due to their countryside setting and the landscape surrounding them.
33. I note the suggestions that the continuing demand for employment land at both Greendale Business Park and Hill Barton Business Park serves as an indicator that there are problems with the employment allocations in the EDLP. However, it seems to me that this is a matter that would be more appropriately addressed through a future review of the EDLP and/or the Greater Exeter Strategic Plan rather than providing for the expansion of these business parks in this Plan contrary to the strategic intentions of the EDLP.
34. Having regard to all of the above therefore, I am satisfied that the approach not to provide for the further expansion of Greendale Business Park and Hill Barton Business Park in the EDVP beyond that which is already authorised is justified and consistent with the development strategy of the EDLP. However, in order to provide clarity, it is necessary to include within the EDVP policies and supporting text which relate to the business parks and make the relevant connection to the policies of the EDLP, particularly Strategy 7 which relates to development in the countryside (**MM08, MM09, MM10** and **MM11**). These main modifications would also ensure that the Plan is legally compliant and capable of effective implementation in so far as the inset maps that illustrate

⁶ Submission and Evidence Base Document Ref: VP32

⁷ Submission and Evidence Base Document Ref: VP28

⁸ Submission and Evidence Base Document Ref: VP12

the extent of the land authorised for business uses at Greendale Business Park and Hill Barton Business Park are to be included on the policies map.

35. I note that the inset map for Hill Barton Business Park does not include the land occupied by the wood gasification plant, this having been excluded by the Council as it considers it is not a mainstream employment use. Nevertheless, I am satisfied that it shows an appropriate and reasonable depiction of the extent of authorised business uses at the business park.
36. I have considered the Council's request that was made following the meeting of its Strategic Planning Committee on 14 December 2017 for an amendment to the two MMs which provide policies for Greendale Business Park and Hill Barton Business Park. Whilst I appreciate that all the relevant policies of the EDLP would apply to development proposals at the business parks, I consider that in the interests of clarity it would be beneficial to retain within these MMs the specific reference to Strategy 7 of the EDLP which relates to development in the countryside.
37. To conclude on this issue therefore, subject to **MM08, MM09, MM10** and **MM11** the approach adopted in the EDVP to Greendale Business Park and Hill Barton Business Park is justified and consistent with the development strategy of the EDLP and is capable of effective implementation.

Issue 5 – Whether the policies relating to Beer village centre and Colyton town centre (Beer01 and Colyton01) are justified, effective and consistent with national policy.

38. Beer village centre contains a mix of uses which serve both the everyday needs of local residents as well as the tourist and visitor market. A key characteristic of the centre is the interspersing of retail premises and food and drink outlets with residential uses. The vitality assessment⁹ recognises that the visitor economy helps to maintain a higher level of shops and services than the resident population alone could support and also that the liveliness of the town centre attracts visitors to Beer.
39. The main threat to the vitality of Beer village centre is the potential for the loss of main town centre uses to residential uses. Whilst it is likely that this would be in the form of holiday accommodation which would contribute to the local economy, it would nevertheless undermine the attractiveness of the village as a shopping centre and tourist destination and potentially contribute to a decline in overall footfall.
40. Colyton town centre essentially serves the day to day needs of local residents and the wider rural population thereby reducing the need to travel to larger shopping centres. As with Beer village centre the main threat to the vitality and viability of the town centre is the loss of main town centre uses to residential uses which would undermine its functional importance.
41. Policies Beer01 and Colyton01 seek to protect the character, diversity, vitality and viability of the defined Beer village centre and Colyton town centre by

⁹ Submission and Evidence Base Document Ref: VP11

encouraging main town centre uses and resisting proposals for other uses unless certain circumstances exist. Such an approach is justified and consistent with the Framework which encourages local planning authorities to define the extent of town centres and pursue policies to support their viability and vitality. The Framework further promotes an approach which reflects the individuality of town centres and policies Beer01 and Colyton01 seek to achieve this by allowing flexibility in the range of permitted uses, having regard to the particular characteristics of the town or village centre. However, given that the stated intention of the policies is to protect the vitality and viability of the two centres, **MM04 and MM05** are necessary to provide clarity and certainty as to how proposals for new main town centre uses which are within the defined BUAB but outside of the defined vitality and shopping areas would be considered. The renumbering of the policies relating to Beer village centre and Colyton town centre in MM04 and MM05 is as a consequence of MM03.

42. For the reasons given above, subject to the main modifications referred to, the policies relating to Beer village centre and Colyton town centre will be justified, effective and consistent with national policy.

Issue 6 – Whether specific monitoring indicators relevant to the EDVP should be included in addition to those which will be addressed through the monitoring framework for the EDLP in order to provide a comprehensive assessment of the effectiveness of the EDVP and having regard to the SA.

43. The submitted EDVP does not include any monitoring indicators or targets for assessing its effectiveness. Whilst the EDLP identifies a number of key monitoring indicators that are relevant to the EDVP these do not address all the relevant monitoring indicators set out in the SA for the EDVP. **MM12** introduces a monitoring framework which incorporates those relevant monitoring indicators and targets set out in the SA that are not addressed through the key monitoring indicators for the EDLP and cross references them to the relevant Key Policy or Strategy. Subject to this main modification a comprehensive assessment of the effectiveness of the EDVP having regard to the SA will be provided.

Public Sector Equality Duty

44. The Public Sector Equality Duty is set out in Section 149 of the Equality Act 2010. The EDVP was subject to an Equalities Statement Screening Report¹⁰ in respect of the Equalities Act 2010 which concluded that a full Equality Impact Assessment was not required. I see no reason to take an alternative view.

Assessment of Legal Compliance

45. My examination of the legal compliance of the Plan is summarised below.
46. The LDS has been updated since 2012 to take account of delays in producing the EDLP. The latest update of the LDS was in July 2017 and sets out an

¹⁰ Submission and Evidence Base Document Ref: VP09

expected adoption date for the EDVP of February 2018. Notwithstanding some slight slippage in the timetable of the EDVP, its content and timing are broadly in accordance with the LDS.

47. The Council's Statement of Community Involvement (SCI) was adopted in 2013. The consultation on the EDVP and the MMs was carried out in compliance with the SCI.
48. Sustainability Appraisal has been carried out and is adequate.
49. The Habitats Regulations Assessment Screening Report February 2017¹¹ sets out why an Appropriate Assessment is not necessary.
50. Having regard to the scope and content of the EDVP, the extent to which Section 19 (1A) of the 2004 Act has a bearing on it is limited. The legal requirement relates to the development plan documents as a whole and the EDLP includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Accordingly, I am satisfied that the development plan taken as a whole, achieves the statutory objective.
51. As indicated above **MM02, MM03, MM08, MM09, MM10** and **MM11** are necessary to ensure that the EDVP is legally compliant. Accordingly, subject to these recommended main modifications the EDVP complies with all the relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

52. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
53. The Council has requested that I recommend MMs to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the East Devon Villages Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the Framework.

Beverley Doward

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

¹¹ Submission and Evidence Base Document Ref: VP06