
Report to the Secretary of State for Communities and Local Government

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an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 17 September 2020

TOWN AND COUNTRY PLANNING (CONTROL OF ADVERTISEMENTS)
(ENGLAND) REGULATIONS 2007

EAST DEVON DISTRICT COUNCIL

THE COUNTY OF DEVON (NORTH AND EAST DEVON
AREA OF SPECIAL CONTROL OF ADVERTISEMENTS) ORDER

PROPOSED MODIFICATION 2019

Site visits made on 14, 20 & 21 July 2020

File Ref: APP/ADCPO/20/07

Introduction

1. I have been appointed by the Secretary of State for Communities and Local Government to consider the proposal by East Devon District Council (“EDDC”) to modify the County of Devon (North and East Devon Area of Special Control of Advertisements) Order (“the Order”) by removing land from, and including land in, the area of control. The modified Order, made on 15 November 2019, is cited as The County of Devon (North and East Devon Area of Special Control of Advertisements) Order 2019 (“the 2019 Order”).
2. Areas of Special Control for Advertisements (“ASCA”) Orders place additional restrictions on the display of advertisements. In an ASCA some advertisements that would otherwise benefit from deemed consent would require express consent.
3. Regulation 20(1) of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) (“the Regulations”) requires that every local planning authority shall from time to time consider whether any part or additional part of its area should be designated as an area of special control. Regulation 20(2) states that an area of special control shall be designated by an area of special control order made by the local planning authority and approved by the Secretary of State, in accordance with the provisions of Schedule 5 of the Regulations.
4. Paragraph 132 of the National Planning Policy Framework sets out that “the quality and character of places can suffer when advertisements are poorly sited and designed...Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.” Planning Practice Guidance (“PPG”) sets out that “It may be appropriate to designate an area of special control in locations where the local planning authority considers these additional restrictions are necessary, above and beyond its powers to restrict deemed consent and take discontinuance action, such as in rural areas or other areas which appear to the Secretary of State to require special protection on the grounds of amenity.”
5. EDDC carried out consultation as part of the review of the ASCA in September 2018 and February/March 2019. This included local trade and amenity organisations as referred to in the PPG.
6. Part 1 of Schedule 5 to the Regulations sets out the ‘Procedure for Area of Special Control Orders’. I am satisfied that the requirements have been met, with Notice of the Order published in the London Gazette on 25 November 2019 and the Exmouth Journal and the Midweek Herald on 27 November 2019.
7. No objections were made to the Order as part of the formal notification process, which ended on 14 January 2020.
8. My site visits took place on various dates in July 2020 in order to understand the nature of the Order area with respect to the proposed modifications. My site visits involved land proposed to remain within the

Order; land proposed to be removed from the Order; and, land proposed to be included in the Order.

Control in areas of special control

9. The Regulations concerning the display of advertisements are complex, with many rules about the type and size of advertisement that can be displayed in various locations. Paragraph 21 of the Regulations sets out that no advertisement may be displayed in an ASCA unless it falls within particular categories. EDDC indicate that the main differences between areas within an ASCA compared to those outside relate to the scale of the sign and the letters/characters used on it.
10. As well as the additional restrictions that apply in an ASCA, there are also limitations on the display of advertisements in an Area of Outstanding Natural Beauty ("AONB") or a conservation area. These restrictions often overlap with those that apply in an ASCA, but some types of advertisement would need specific permission from the Local Planning Authority in an ASCA but not in a conservation area or AONB.
11. There are two main AONB designations covering about 66% of East Devon: the East Devon AONB and the Blackdown Hills AONB. The Blackdown Hills AONB does not extend into any of the affected Built-up Area Boundary ("BUAB") but several areas are affected by the East Devon AONB. The BUAB of each main town in East Devon is defined in the adopted East Devon Local Plan 2013 to 2031 ("the EDLP"). Some of the areas in Axminster, Beer, Budleigh Salterton, Colyton, Honiton, Ottery St. Mary, and Sidmouth proposed to be removed from the ASCA are also within conservation areas.

The County of Devon (North and East Devon Area of Special Control of Advertisements) Order and the Modifications Proposed by the 2019 Order

12. Most of East Devon is covered by the ASCA Order designated by Devon County Council in 1964 and since periodically modified. Parts of the main towns and the village of Beer are excluded from the ASCA but with the expansion of the towns, the development of the new town of Cranbrook, and the designation of an Enterprise zone, EDDC felt that the Order should be reviewed. It was felt that there was limited consistency between the types and areas excluded within the towns, such that there was uncertainty about the rules for display of advertisements.
13. In the review guiding principles were established to provide a consistent approach across the district and the 2019 Order proposes changes in line with those principles, as set out below:
 - a) In Axminster, Exmouth, Honiton, Ottery St. Mary, Seaton and Sidmouth land inside the adopted BUAB would be excluded from the ASCA unless it is within an AONB;
 - b) In Budleigh Salterton there would be no major changes to the excluded area because the town is 'washed over' by the East Devon AONB;

- c) In Cranbrook all areas with planning permission for major development would be excluded from the ASCA; and
 - d) Land within the Exeter and East Devon Enterprise Zone would be excluded from the ASCA.
14. As the 2019 Order relates to a large area there are overview maps in each Schedule to the 2019 Order, with individual larger scale maps showing more detail. Schedule 1 to the 2019 Order shows the land proposed to be excluded from the ASCA as edged and hatched purple on the sealed plan, whilst retaining those areas outlined and hatched green. Schedule 2 to the Order shows the land proposed to be included in the ASCA as edged and hatched yellow, with the current ASCA land outlined and hatched green.

The Council's Statement of Reasons for Making the Order

15. An ASCA places additional controls on the display of adverts and should only be imposed in areas that need special protection due to their scenic, historic, architectural or cultural significance. The additional restrictions on advertisements would be justified to conserve the visual amenities of that area.
16. A comprehensive review of the ASCA by EDDC was supported by a consultation document that set out fully the purpose and implications of the ASCA designation; the reasons for undertaking the review; and, the principles that were followed to identify areas that should be included in or excluded from the ASCA.
17. The review showed that some areas no longer required the special protection afforded by the ASCA and should be removed from it. It also showed that a small number of areas currently outside of the ASCA merited additional protection and should be included. EDDC amended the ASCA Order accordingly and has submitted the modified Order to the Secretary of State for approval in accordance with the Regulations.
18. EDDC recognised that the approach of using the BUAB for defining areas to be excluded from the ASCA could be criticised on the basis that the BUAB was designed for a separate purpose (to inform a policy relating to appropriate locations for development). It is a boundary that has been defined following consultation and examination through the local plan adoption process. However, it is used and understood by local communities and businesses. Although there are built-up areas outside of the boundary, and in a few cases land with a rural character inside it, it has been accepted as a method of defining the areas where a more relaxed planning regime should exist than in the countryside (which is defined in East Devon as those areas outside of the BUAB).
19. A consistent approach between the two boundaries has the practical advantage that it would be more clear which land would lie outside the ASCA. The exception is where the land within the BUAB also lies within the East Devon AONB. With the exception of Budleigh Salterton (which is 'washed over' by the East Devon AONB) no land within the AONB is proposed to be taken out of the ASCA; it is protected on the basis of its

scenic beauty and therefore suitable for inclusion in the ASCA because of its nationally recognised landscape character.

20. Representatives of local amenity groups, local trade organisations, Parish Council's, local Members and the national advertising body¹ were sent details of the review and asked for comments. Alterations to the ASCA were agreed that incorporated the issues raised in response to the consultation. Some anomalies in the base mapping of the AONB boundary resulted in minor changes in Exmouth and more noticeable changes in Sidmouth, Honiton and Beer, giving rise to areas proposed to be kept inside the ASCA due to their AONB status.

Analysis and Conclusions

21. This Order seeks to modify the existing controls and the matters to be considered are the exclusion of land; the inclusion of land; and, the appropriateness of retention of control for the remaining land. I will deal with the changes proposed for each main area, as identified in the EDDC Statement of Reasons.

Axminster

22. Axminster is a main town situated to the east of the West of England main railway line and the River Axe. Currently only a small part of the town is excluded from the ASCA, including the town centre and some residential areas but not the Co-op supermarket or most of the carpet factory site.
23. The proposed ASCA boundary would follow the BUAB as defined in the EDLP, with the exception of the land identified for a development of around 650 homes with associated employment land, open space, community facilities, a primary school and land for a north/south relief road to the east of Axminster. Whilst the EDLP identifies this mixed-use allocation, following the adoption, a masterplan showed that the development would need to be expanded to include land further to the east and an additional 200 homes. As a result, EDDC have not sought to include this area in the ASCA.
24. The proposed exclusion of the land extending from Abbey Close, Woodbury Park and Woodbury Way to the south, to the railway line to the west, up to but excluding the Axminster Football Club to the north, including Weycroft Avenue in the north and east to Cunningham Avenue, Bonners Glen, Threeacre Close, Upper Mead, Tigers Way, Salway Gardens, 'Endfield' on Lyme Road, Lyme Close and Morton Way, Site AXd, is appropriate. This area would be clearly understood to be 'the town' and is not within the AONB so there would be no reason for the ASCA to apply. Due to the uncertainty over the timing and extent of the eastern development it would not appear sensible to exclude the area from the ASCA in this proposed modification at this time.
25. Three small areas lying to the west of the town are proposed for inclusion in the ASCA: land north-west of the railway line, alongside the railway station

¹ the Advertising Association

(site AXa); a section of railway line and part of the River Axe north-west of Shand Park (site AXb); and, the section of the River Axe south-west of Stoney Bridge (site AXc). Although including the railway line itself in part I consider that these sites have a rural character that differs from the town east of the railway line and so should have additional protection through inclusion in the ASCA.

26. I consider that the Secretary of State can be satisfied that the proposed modifications in relation to Axminster would be appropriate.

Beer

27. Beer is a village in a rural coastal setting within a steep-sided valley, south-west of the town of Seaton. It is surrounded by, and partially within, the East Devon AONB. The BUAB for Beer was defined in the East Devon Villages Plan and, due to the smaller more rural setting of the settlements considered in the Villages Plan, it was decided not to remove the land within the BUAB as part of the ASCA review. The review sought to amend the area excluded from the ASCA to mirror the village centre defined in the Beer Neighbourhood Plan, which superseded the Villages Plan. This approach reflects the commercial nature of the centre of Beer, which is significantly more important than in other Villages Plan settlements.
28. Currently only a small part of Beer is excluded from the ASCA, including the village centre and surrounding buildings. EDDC indicate that Policy H4 of the Beer Neighbourhood Plan seeks to retain the mix of retail and commercial premises in the village centre. Using the same boundary would mean that more land would be taken out of the ASCA than would be included. The land to be excluded is identified as sites BEa, BEb, BEc, BEd and BEe lying to the east and west of the existing excluded area centred on Fore Street, which runs generally north-south along the valley to the sea and beach, providing the commercial heart of the village.
29. A small part of the village centre, the western half of a car park accessed off Clapp's Lane, lies within the AONB and so is not proposed for exclusion from the ASCA.
30. The land proposed for inclusion in the ASCA is north of The Square, including numbers 1 – 3 The Square and 1 - 3 Richmond Terrace, site BEf; Pioneer Cottages off New Cut, BEg; land east of 18 The Meadows, BEh; and, part of the access track to the public gardens east of Sea Hill, BEi. These areas are generally residential and/or non-commercial and lie outside the BUAB and their nature justifies inclusion in the ASCA.
31. Matching the ASCA boundary to the village centre boundary would provide clarity and align a more relaxed advertisement regime to the commercial heart of the village as defined in the Neighbourhood Plan. I consider that the Secretary of State can be satisfied regarding the proposals relating to Beer.

Budleigh Salterton

32. Budleigh Salterton is a seaside town which is 'washed over' by the AONB. As a result, the proposed changes sought to ensure that the only area not within the ASCA was the commercial centre of the town. Policy E9 of the EDLP seeks to retain the vitality and viability of the town centre, which was defined on the Budleigh Salterton proposals map. This town centre boundary was used to modify the ASCA boundary so that they correlate.
33. The area proposed to be excluded from the ASCA comprises numbers 4 – 12 Fore Street (Site BSa), which is identifiable as part of the town centre commercial area, being the frontage for shops and services on the main road, the B3178, Fore Street. I consider it appropriate that the area should be excluded from the ASCA, making it easier to display advertisements and so potentially provide business benefit.
34. The land to the rear of numbers 52 – 60 High Street (BSe) comprises the rear of businesses and premises on the main road, the B3178, High Street lying between The Lawn and Station Road. To the north of the proposed boundary there is a brook and a footway adjacent to the library and on Station Road and the Medical Centre on The Lawn. The reason for inclusion of this area is that it lies within the town centre boundary as set out in the EDLP; as such the inclusion of the area to this boundary appears to be appropriate.
35. Three areas lying just outside the defined town centre boundary were proposed to be included in the ASCA. Site BSb is land to the rear of 1 High Street; numbers 2 – 16 (evens) Queen Street; Lobster Cottage; numbers 1 – 8 Arden Close; numbers 1 – 7 Cliff Road; Cliff Court; land to the rear of numbers 31 and 33 High Street; numbers 1 – 7 Palmer Mews; and numbers 2 – 18 (evens) Victoria Place. These are primarily residential areas and I consider that the Secretary of State should include them within the Order.
36. Site BSc comprises the rear portion of commercial premises fronting onto the High Street, off Brook Road. Although there is associated commercial activity in terms of servicing the properties on the High Street these areas lie outside the town centre boundary and so it would be appropriate for them to be included in the ASCA.
37. Site BSd relates to the rear of numbers 2 – 10 High Street (evens); 9 Fore Street; Temple Methodist Church; 1 Pebble Lane; 1 – 6 Poplar Row; 1 - 3 Fore Street; and numbers 11 – 23 (odds) Fore Street. The land use is a little more mixed as, although predominantly a residential area, it includes a car park, a church, a public house on Chapel Street, a shop and café set to the north of the brook off Fore Street. These areas sit within the AONB and are generally non-commercial. The identified commercial premises are unlikely to be disadvantaged by the inclusion of the area within the ASCA. Given the nature and setting of their businesses conservation of the visual amenity would be advantageous.

38. I consider that the Secretary of State can be satisfied that the proposals in relation to Budleigh Salterton are appropriate.

Colyton

39. Colyton is a small rural town lying to the north of Seaton and south of the River Coly. The consultation noted that Colyton is currently wholly included in the ASCA and consideration was given to excluding the area identified as the vitality and shopping area defined in the adopted East Devon Villages Plan (Policy VP03). Colyton Town Council responded to the consultation with a request that the ASCA for Colyton should remain in place.
40. The centre of Colyton, including the Market Place, is comprised of the older heart of this small town and, as such, I consider that it would not be inappropriate for this older area, drawing tourism and trade, to be afforded the additional protection of the ASCA. The rest of the town, which is not within the AONB, the boundary of which follows the rivers around the town, is generally residential and could easily be managed through the usual advertisement control. However, I consider that the Secretary of State can be satisfied that it is appropriate to take the views of the Town Council into account. There would be no obvious disadvantage to leaving the ASCA in place and there have been no objections to the proposal.

Cranbrook

41. Cranbrook is a new town situated to the east of the city of Exeter, lying generally between the West of England main railway line to the north and the B3174 to the south. Development started in June 2011 and around 2000 homes have been completed together with two schools, a railway station and neighbourhood centre. The emerging Cranbrook Plan makes provision for a total of 7750 homes by 2031 and includes expansion to the south, east and west of the areas with existing planning permission. Hearing sessions on the Cranbrook Plan commenced in January 2020, with sessions, having been interrupted due to Covid-19, expected to resume in November.
42. During consultation Cranbrook Town Council was in favour of excluding from the ASCA not just the areas for which planning permission was granted but also those areas proposed for development in the submitted Cranbrook Plan. The proposed excluded land is therefore two large areas, identified as site CRa.
43. There has been, and continues to be, rapid development of the town, with building works evident. As such I consider that the Secretary of State can find it appropriate to exclude all the land proposed for development, including that within the emerging plan. Even if the Cranbrook Plan was to be modified to remove some of the area as submitted there would not appear to be any significant detriment to the control of advertisements without the ASCA. Although relatively rural there are existing businesses and properties and the area is not within the AONB.

Enterprise Zone

44. The Exeter and East Devon Enterprise Zone comprises four separate geographical sites, the Airport Business Zone, Cranbrook Town Centre, Science Park and Skypark. These provide a range of incentives to attract and support new and growing businesses. EDDC have indicated that the simplified planning rules of the Enterprise Zone and commitment to development mean that the ASCA designation is no longer appropriate in these areas. This seems to be sensible and so the Secretary of State can find it appropriate that they should be excluded.
45. It appears that the Cranbrook Town Centre enterprise zone is wholly included within the area CRa relating to the area to be excluded from Cranbrook. The Secretary of State may wish to consider excluding it from one of the maps within the Order so that it is not included twice in the same Order. However, continuation as is would not result in an error in the intended outcome, which is to exclude the area.

Exmouth

46. Exmouth is a main town to the south-east of the city of Exeter, lying to the east of the River Exe estuary. The principle in relation to Exmouth was for land inside the adopted BUAB to be excluded from the ASCA unless it was within an AONB.
47. As a result four areas were proposed to be taken out of the ASCA: land north of Dinan Way allocated for development in the East Devon Local Plan and land south of Dinan Way including Chaucer Rise, Tennyson Way, Whitman Close, Byron Way, Wordsworth Close, Keats Close, Shakespeare Way, Coleridge Close and Brittany Road (Site EXa); Liverton Business Park (site EXb); land south of Jarvis Close, south of Buckingham Close and east of Buckingham Close and Douglas Avenue including Taylor Crescent, Lipscomb Avenue, Chamberlain Avenue, Wragg Drive, Park Drive, Chapman Road, Nicholas Way and Buckeridge Road (site EXc); and a short row of older housing east of Littlemead Lane including Three Oaks, Wentwood, Sheldrake, Sandakan, Roundwood and Meadowsweet (site EXe).
48. These areas either already have an urban appearance or are proposed for development in the local plan and so no longer meet the criteria of exceptional scenic quality that would justify keeping them within the ASCA. Areas within the AONB were proposed to be kept in the ASCA, including some narrow strips of land identified after the consultation.
49. Three areas on the edge of the town were identified for inclusion in the ASCA. Site EXf comprises a narrow strip of land between the railway, the Exe estuary and the recreation ground off Marine Way, which is mainly covered in trees with an area of boat storage to the south. This land lies outside of the BUAB and has a strong visual relationship with the Exe Estuary. Site EXg is the land and houses north of Courtlands Lane and EXk fields north of Maer Lane and north-west of Maer Road. These areas

comprise older properties in a rural setting, fields and, particularly in the case of EXe, are of scenic quality that supports their inclusion in the ASCA.

50. I consider that the Secretary of State can be satisfied with regard to the proposals in the Order in relation to Exmouth.

Honiton

51. The market town of Honiton lies generally south of the A30 in the River Otter valley. The principle taken was that land inside the BUAB would be excluded from the ASCA unless it was within an AONB. An area of the town centre, including the school and college to the north and the train station to the south is already excluded from the ASCA. A larger area of land, still south of the A30 and not within the AONB is proposed to be removed from the ASCA. This land is identified in Schedule 1 to the Order as HOe and I consider that this generally urban area would be well served by the control ordinarily available, without the need for continued inclusion as ASCA.
52. Some sites to the south of the town were consulted upon for exclusion but these (sites HOa, HOb and HOC) and part of a recreation area are proposed to be kept within the ASCA due to their AONB status. The recreation area was one of those affected by initial errors in identification of the AONB boundary.
53. An additional site, HOD to the south-west of the town has planning permission for around 300 homes and is currently in advanced stages of development. However, as it lies outside of the BUAB it is proposed to remain inside the ASCA. It may be difficult for the public to understand that land built on is not within the urban boundary. However, it is reasonable that as it lies in the countryside, as still defined in the local plan, and will become a primarily residential area it should remain within the ASCA at this time.
54. The Secretary of State may wish to consider the exclusion of the land HOD from the ASCA on the basis that as a residential area there is limited scope for advertisement in any event and so it would be adequately served without the need for additional controls. However, I consider that it is helpful to have an identified boundary to work to, which is provided by the BUAB. For that reason, I consider that the Secretary of State can be satisfied that the proposals in relation to Honiton are appropriate.

Ottery St Mary

55. Ottery St. Mary is situated on the River Otter within a generally agricultural landscape. A small part of the town centre was excluded from the ASCA and, with no land within the AONB, large areas of the surrounding town, in all directions, are proposed to be removed from the ASCA by the Order. The land to be excluded is that identified in Schedule 1 to the Order, OSMa. I consider that this extensive area would be adequately served by the control ordinarily available, without the need for additional control through continued inclusion as ASCA. As noted, parts of Ottery St Mary are within a

conservation area, which would provide additional control where appropriate.

56. Although EDDC contemplated the removal of two developed sites lying outside of the BUAB (sites OSMb and OSMc in the consultation document) they decided that as residential areas outside of the BUAB they should be retained in the ASCA. There may be some confusion for the general public that the BUAB does not match the physically built up area. However, it is helpful to have an identified boundary to work to, which is provided by the BUAB. For that reason, I consider that the Secretary of State can be satisfied that the proposals are appropriate in relation to Ottery St. Mary.

Seaton

57. Seaton is a seaside town and the town centre was already excluded from the ASCA. Applying the principle in relation to the BUAB led to large parts of the town, particularly to the northwest of the town-centre, with smaller areas to the north/north-east, proposed to be taken out of the ASCA. There is nothing to suggest that these areas would not be adequately served by the control ordinarily available, without the need for additional control through continued inclusion as ASCA. The land to be excluded is that identified in Schedule 1 to the Order as SEa, SEb and SEc.
58. The ASCA extends along Seaton Beach to the south side of the town. The boundary appears to be the seawall to the south of the Esplanade. To the west the proposed boundary, following exclusion of the area SEa, would include land running a little further north of the seafront to the BUAB.
59. A small area on this south-western side of the town centre is proposed for inclusion in the ASCA, as it lies outside of the BUAB. Area SEd is a relatively small strip of land between the beach promenade and the seafront road, Castle Hill, which rises above the affected land. The affected land itself includes the promenade, a kiosk and public toilets and joins the widening area of the existing ASCA south-west of Castle Hill.
60. This is a relatively small area of land which differs from the immediate areas within the ASCA as it is built upon, although right on the edge of the BUAB. It may not be obvious to the public what difference there was between the land within the ASCA and the land outside at this particular location; as such the Secretary of State may wish to consider leaving this area excluded from the ASCA, although there have been no formal objections to the proposal. However, the location is adjacent to the foreshore in a pedestrian area at the edge of the town and separated from the rest of the area excluded from the ASCA by roads. I am satisfied that it is sufficiently separate to support the principle of additional control of advertisements. For that reason, I consider that the Secretary of State should approve the proposals in relation to Seaton.

Sidmouth

61. Sidmouth is a coastal town situated within the valley, predominantly to the west of the River Sid. The town centre and predominantly residential areas

to the west are currently excluded from the ASCA. Areas of the Sidmouth BUAB lie within the AONB, but a large area of the town is proposed to be taken out of the ASCA on the basis that it is inside of the BUAB but not in the AONB. These surrounding areas lie to the east, west and, mainly, north of the existing area outside the ASCA and are identified as sites SIa, SIb, SIc and SId in the Order. This include some additional housing areas that were not shown as being in the AONB in the consultation document, following clarification of the AONB status. No sites were identified in Sidmouth for inclusion in the ASCA.

62. The areas identified are appropriate for exclusion from the ASCA, as set out in the Order.

Discussion

63. The principle to be followed was to match the exclusion from the ASCA to the BUAB. However, the BUAB does not always match the actual built area due to changes subsequent to the identification of the BUAB in the EDLP, for example HOd in Honiton and OSMb and OSMc in Ottery St Mary. On balance it is sensible for the BUAB to provide the area to which the ASCA would apply. Those involved in business, rather than simply residents, would be most likely to aware of the BUAB and to wish to place advertisements in the first instance.
64. There will always be a lag between the planning and building on land, such that the BUAB may be ahead or behind reality. Although seeking to provide some clarity, the BUAB has not been used entirely consistently. For example, large areas of land yet to be developed in Cranbrook, CRa, are proposed to be excluded from the ASCA, whilst the smaller area to be developed in Axminster, see paragraph 23, is not proposed to be excluded at this time. Although the Secretary of State may wish to consider whether to modify the 2019 Order for the sake of consistency it appears that the timeline in relation to the Axminster site is more fluid. This land is generally of a more rural nature than that in Cranbrook and so it appears appropriate for it to remain part of the ASCA until a later review, when the situation can be reconsidered.

Recommendation

65. I recommend that the Secretary of State approve The County of Devon (North and East Devon Area of Special Control of Advertisements) Modification Order 2019 without modification.

Heidi Cruickshank

INSPECTOR