

24 November 2025  
NDP Representations on behalf of 3West - final

Planning Policy Team  
East Devon District Council  
Blackdown House  
Border Road  
Honiton  
EX14 1EJ.

Sent via email only: [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk)

Dan Yeates BSc (Hons) MA MRTPI  
E: [REDACTED]

Embassy House  
Queens Avenue  
Bristol BS8 1SB  
T: +44 (0) 1179 100 300  
savills.com

To whom it may concern,

### **Draft Woodbury Parish Neighbourhood Plan Consultation (Regulation 16)**

This Regulation 16 representation is submitted on behalf of our clients, *3West Group*, in respect of the Submission Version of the Woodbury Parish Neighbourhood Plan ("Draft Neighbourhood Plan") submitted to East Devon District Council in October 2025.

Our clients recognise the importance of Neighbourhood Planning and its role in shaping how a parish develops in a sustainable way. It is clear however that Neighbourhood Plans must be closely guided by the strategic context, especially an emerging development plan document.

Our clients wish to contribute productively to the Draft Neighbourhood Plan, however we currently have concerns as to the content of the Neighbourhood Plan and the procedure that has been followed to date, including the publication of important documentation, which we set out in detail below.

#### **Legislative and Guidance Requirements**

We have reviewed the Draft Neighbourhood Plan against the basic conditions under paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 ("TCPA"), and also in light of the regulatory requirements under the Neighbourhood Planning (General) Regulations 2012 and the Neighbourhood Planning Independent Examiner Referral Service ("NPIERS") Guidance to Service Users and Examiners.

In summary, we consider that the Draft Neighbourhood Plan does not presently meet the basic conditions. In short, the Neighbourhood Plan does not make sufficient provision for housing within its stated period (up to 2031). The plan period proposed to 2031 will also mean that by the time the plan is 'made' it will cover a period of less than 5 years, which is not sufficient.

Overall, we consider the Draft Neighbourhood Plan will need to be subject to further modifications before it can proceed to referendum.

#### **The Absence of a Housing Requirement and Insufficient Housing Allocations**

The most significant flaw is that the Neighbourhood Plan does not include a housing requirement, especially for its full plan period up to 2031. It therefore does not include any policies or allocations to meet that housing requirement, pursuant to NPPF 14(b) and 70.

This in turn means that the Neighbourhood Plan's spatial strategy has been prepared on a flawed premise, having failed to follow the PPG guidance in the Neighbourhood Planning Chapter. The PPG explicitly states:

- the “reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development”;
- where Draft Neighbourhood Plans “contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need”; and
- “where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make”.

The result is a Draft Neighbourhood Plan which makes no provision for future housing through a target housing requirement or allocations.

The published Consultation Statement (September 2025) supporting the Draft Neighbourhood Plan states that “The decision to include sites or not was eventually overtaken by the decision of EDDC to allocate development sites in their new Local Plan. As the number of EDDC allocated sites represents a dramatic expansion of both Exton and Woodbury villages it was agreed that the NP should not identify any further sites”.

We do not agree with this and do not consider this forms sufficient justification, for the following reasons:

- Contrary to paragraph 14 of the NPPG which requires neighbourhood plans to contain policies and allocations to meet its identified housing requirement;
- Will not meet the basic conditions to ensure the plan is sound;
- A neighbourhood plan becomes part of the statutory development plan once adopted. This means planning applications must be determined in accordance with it unless material considerations indicate otherwise. Including housing allocations ensures the plan is robust and influential in shaping development decisions;
- Lack of consistency with strategic policies and site allocations contained within the emerging East Devon Local Plan

This demonstrates a lack of proactive planning as part of the draft Neighbourhood Plan. To simply rely on the emerging East Devon Local Plan which is some way from adoption is not a sound approach in our view.

In our view the draft Neighbourhood Plan should include site allocations, and one potential way to resolve this is to explore those sites currently included within the emerging East Devon Local Plan as draft allocations. Reflecting the same site allocations would clearly ensure consistency with the Local Plan.

### **The Absence of Documentation**

Neighbourhood plan preparation is a formal, public participative process and it is essential that those preparing neighbourhood plans are transparent in respect of the evidence base drawn upon and their interactions with a Local Planning Authority.

There is a significant gap in the evidence base and online records in respect of how the Neighbourhood Plan was prepared. It is not possible to understand how the Steering Group has met the requirements of the PPG for close cooperation, and indeed exactly what actions East Devon District Council has taken to date.

We note that a number of other parties have raised similar concerns at Regulation 14 stage, in respect of the Draft Neighbourhood Plan's refusal to allocate sites.

It is also clear that no evidence has been published in the form of either a Housing Needs Assessment or site assessment work to inform potential site allocations and future housing need. This demonstrates a lack of proactive planning as part of the draft Neighbourhood Plan. To simply rely on the emerging East Devon Local Plan which is some way from adoption is not a sound approach in our view.

### **Plan Period**

The plan period appears to be up to 2031 within the submitted Neighbourhood Plan. The plan period start date does not appear to be stated.

However, if the draft Neighbourhood Plan is 'made' later in 2026 that will mean the plan will cover a period of less than 5 years. This is not supported by any explanation or justification within the text of the Draft Neighbourhood Plan.

It is not a sound approach in our view to adopt a neighbourhood plan with no housing requirement or housing allocations, which will then be subject to review at an unspecified further date.

### **Draft Policies**

In regard to the development management policies, we make the following comments and requests for modification:

#### Policy 1 (New Housing Development)

We support the intention and general scope of this draft policy, particularly the inclusion of *"development must be in sustainable and accessible locations and will have due regard to access to regular and reliable public transport and reduced dependency or car use whilst also recognising the importance of disabled Access"*.

Notwithstanding our objections to the absence of housing allocations in the plan, we consider this is at latest a supportive policy in terms of future housing. It should however be coupled with the inclusion of allocations in the plan, rather than sole reliance on this particular policy to facilitate local housing delivery.

#### Policy 4 (Assessment of Cumulative Impact)

We do not consider this draft policy to be sound, and suggest it should either be amended or otherwise removed.

It is common for planning applications for new housing to need to assess the potential cumulative impacts from a transport perspective, however this draft policy as worded is so broad it is unclear that matters it is intended to cover.

Such a board policy will place an unnecessary burden on the planning of future developments which would inevitably have an impact on the need to address local housing need.

We consider that the policy should either be amended to make reference to cumulative impacts from a transport perspective, or it should be removed altogether. Given planning applications for new housing development must assess cumulative impacts in any case this policy is considered unnecessary particularly if it seeks to introduce requirements above and beyond what would normally be expected for planning applications.

#### Policy 5 (Green Energy Initiatives)

We do not consider this draft policy to be sound.

Policies requiring enhanced environmental standards are strategic in nature, and must be set out in the local plan review, not the neighbourhood plan.

National standards for housing development are covered by the Future Homes Standards and changes to the Building Regulations regime. Therefore, introducing draft Policy 5 to cover new development is considered unnecessary duplication particularly if there is a risk this policy will be used in the future to seek to justify requirements over and above what should be provided.

### **Land north and east of Exton Farm**

Further to our objections to the lack of allocations in the draft Neighbourhood Plan, and on the basis this will need to be explored as part of the next steps, we propose that the land north and east of Exton Farm, Exton is considered as part of any further site assessment work to inform allocations in the Neighbourhood Plan.

The site is already referred to within the emerging East Devon Local Plan (Reg 19) as 'Land north and east of Exton Farm (Wood\_28)'. Draft allocation extract attached at **Appendix A**.

The proposed allocation in the latest draft Local Plan (Reg 19) states:

#### *Land north and east of Exton Farm (Wood\_28)*

*The site is allocated for around 39 dwellings. Development will need to provide safe and suitable pedestrian and cycle access along Mill Lane south to the existing pedestrian crossing at the A376/Station Road junction, to enable easy access to facilities in the settlement. This pedestrian crossing should be upgraded to accommodate cyclists, to enable access to the Exe Estuary Trail via Station Road. Development should provide pedestrian/cycle links to Wood\_01 adjacent to north west. Development should include tree planting on the southern field to reflect their historic presence; and retain the hedgerow that dissects the site, as far as practically possible.*

*The south west corner of Wood\_28 is within the Vulnerable Building Distance statutory safeguarding zone surrounding the Royal Marines Commando Training Centre, within which inhabited buildings must be deemed as 'non vulnerable' structures that are of a robust design and construction to the satisfaction of the Ministry of Defence.*

*Anyone preparing a planning application at or for this allocation site should consult with the Ministry of Defence with whom the local planning authority will also engage with in respect of determination of any planning application.*

*The design and layout of development should conserve and enhance the rural setting grade II\* listed Exton Farmhouse, including through the provision of public open space in the northern part of the site. Flood mitigation is required to ensure existing surface water flood risk along Mill Lane is not exacerbated by the development.*

Exton is a sustainable location for future development. The village is very well connected to Exeter on the basis of both its proximity and public transport links. This includes the presence of a railway station in the village and regular bus services. The railway station in particular provides direct connections into Exeter with journey times of only 30 minutes. These public transport services provide residents with good connections to Exeter and the range of regional employment, retail and leisure facilities on offer as a result.

In addition, Exton hosts the following which provide day-to-day services and facilities:

- Shop / convenience store
- Pub

- Village hall
- Children's play area

As a result, Exton is an entirely appropriate location for future growth, and we support East Devon Council's strategy to direct a proportion of the required growth to the village, specifically the inclusion of the Land north and east of Exton Farm (Wood\_28) as a draft allocation for the development of 39 residential dwellings.

The development of the site can provide much needed market and affordable housing to help meet local housing needs, as well as helping to sustain the vitality and viability of the existing services and facilities in the village.

We have been promoting the site separately through the emerging East Devon Local Plan, explaining why we consider the site remains a strong candidate for allocation in the emerging Local Plan Review. The site is available and very much capable of accommodating the 39 new homes proposed in draft Policy Wood\_28, including a policy compliant level of affordable housing.

We therefore consider, for the reasons set out in these representations, that the steering group should look to incorporate site allocations in the draft Neighbourhood Plan, and the land north and east of Exton Farm is a good candidate for such inclusion.

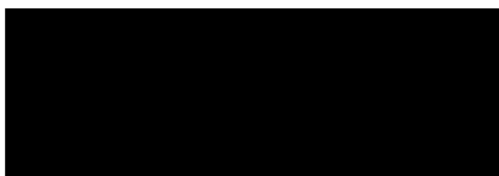
### **Conclusion**

We have set out in this representation why we do not consider the draft Neighbourhood Plan as submitted is sound. This includes concerns over the absence of any housing requirement, site allocations and an absence of supporting evidence.

Further work should be undertaken to justify this, and we look forward to reviewing this further once available. We have suggested that one easy way to ensure consistency with the East Devon Local Plan is to incorporate the draft allocations in the emerging Local Plan. One such site is the land north and east of Exton Farm, and we have included information in these representations to help explain why the site is a good candidate for inclusion.

We trust our comments will be carefully considered and look forward to further input at the next stage.

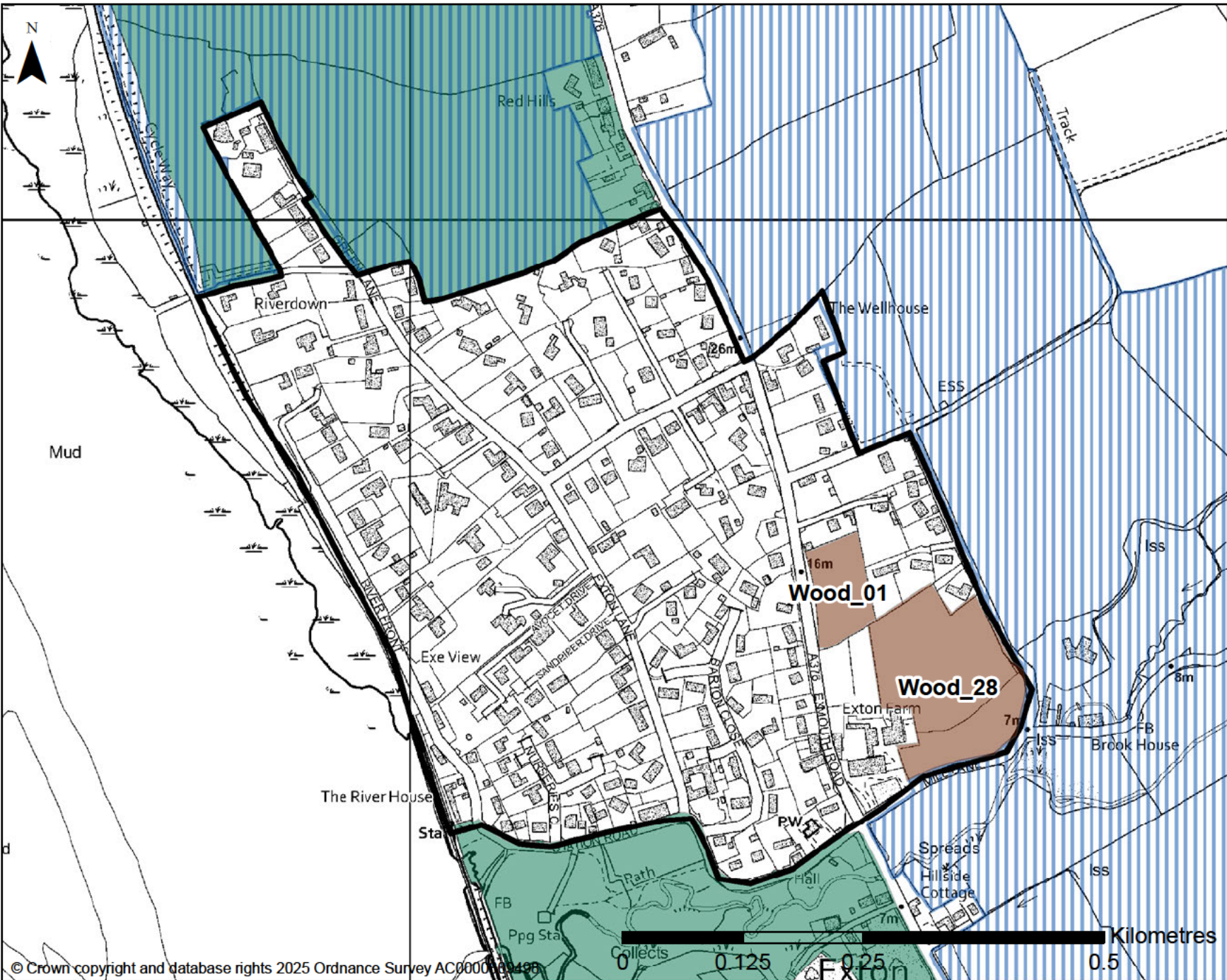
Yours sincerely,



**Dan Yeates BSc (Hons) MA MRTPI**  
Director

**Appendix A** – Draft East Devon Local Plan (Regulation 19) extract for ‘Land north and east of Exton Farm (Wood\_28)’

n.b. This inset map has been provided as an additional resource; the definitive version of the Policies Map is the interactive version which can be accessed here:  
<https://maps.strata.solutions/portal/apps/webappviewer/index.html?appid=8da794a146d94df680ee37c7589e9a1e>



**Legend (key policy boundaries shown only)**

**Site Allocations (SD17)**

**Type**

- Housing
- Settlement Boundaries (SP05)
- Coastal Preservation Areas (OL03)
- Green Wedges (OL05)

**East Devon Local Plan 2020-2042 (Reg 19 Consultation)**  
**inset to Policies Map**