



Date 24.11.24

Angela King
Planning Policy,
East Devon District Council
Blackdown House,
Border Road,
Honiton, EX14 1EJ

Dear Ms King

Woodbury Parish Neighbourhood Plan 2020-2031 Submission/Regulation 16 Draft

I write on behalf of 3West Group Ltd to make representations on the Regulation 16 Neighbourhood Plan (NP) submission consultation.

Neighbourhood Plans are required to meet certain 'basic conditions' and other legal requirements including that they are consistent with national policies and advice contained in guidance issued by the Secretary of State; contribute to the achievement of sustainable development; and, are in general conformity with the strategic policies contained in the Development Plan for the area. However, the NP has been prepared at a time when the strategic policies to which it must relate are in need of being reviewed and updated. The adopted East Devon Local Plan has been due a review since 2021 and a new district wide local plan is in the process of being prepared. We recognise that this makes the task of drafting a NP challenging in terms of demonstrating that it is in general conformity with strategic policies.

The NP is to have a plan period up until 2031, aligning with the plan period of the adopted East Devon Local Plan but as that plan is in the process of being replaced and the proposed plan period for the NP is likely to be less than 5 years by the time it becomes a 'made' plan, it would be unusual for a plan to have such a short plan period. We consider that the plan period should be extended.



Although the draft NP doesn't seek to allocate land we note and welcome that paragraph 2.5 of the draft NP states that the Parish recognises that housing development is needed and that houses are required for those entering the property ladder, moving up the ladder and for those moving back down the ladder.

The NP area incorporates the settlements of Woodbury, Exton and Woodbury Salterton. However, the very edge of the NP area also abuts the existing settlement of Lymptone, even though the existing built area of Lymptone is outside of the NP area. The draft district wide local plan also proposes to elevate both Woodbury and Lymptone from a Service Village to a Local Centre and recognises them as being suitable for additional development to reinforce the service role that they perform in respect of the surrounding area. There is a very real prospect therefore that development will be required within the emerging plan period on land which abuts the existing built area of both settlements, including on land which is within the NP area.

However, the draft NP doesn't appear to account for this potential and consideration should be given to how the policies of the NP could do so in order that the plan is in conformity with the strategic policies of the Development Plan and consistent with the Planning Practice Guidance requirement for a neighbourhood plan to support the delivery of strategic policies set out in the local plan or spatial development strategy and to shape and direct development that is outside of those strategic policies.

Indeed, the prospect of further such land within the NP area being required for development is even greater when consideration is given to the fact that EDDC is seeking to take advantage of the provisions of paragraph 234 (a) of the revised NPPF and has therefore proposed to plan for only 80% of the local housing need for East Devon now identified under the standard method, published on 12 December 2024. This has two significant implications. Firstly, it means that the emerging district wide local plan will require a very significant update, including further allocations of land, almost immediately after its



adoption in order to otherwise bring it in line with the revised NPPF. Secondly, having regard to paragraph 78 (c) of the NPPF it means that almost from adoption of the plan, EDDC will need to effectively demonstrate a six year housing land supply for the purposes of decision making. The status of Woodbury and Lymptstone within the draft local plan as a Local Centre suitable for additional development to reinforce the service role that they perform in respect of the surrounding area, means that further development opportunities on land within the NP area, adjacent to the existing built area of both settlements, may need to be identified.

Should the NP ultimately be amended to incorporate site allocations, we draw attention to the proposed allocation of site WOOD-10 (location plan appended), for a scheme of around 60 dwellings within the emerging EDDC local plan. The site is also subject to an Outline planning application for up to 60 dwellings (appl ref: 23/2166/MOUT) and benefits from a resolution to grant planning permission (the planning decision notice is expected to be issued imminently). Therefore we confirm that this site is both available and suitable for development and should be included within any potential future NP site allocation policy.

With consideration to the above, we would like to pose the question of whether it would be wise to pause this process until the local plan is formally adopted, to ensure the NP's relevance and consistency with the policies contained within the local plan.

As a more general comment, the policies of the NP should not seek to impose greater requirements of new development than will otherwise be required by the local plan or the NPPF.

This includes any requirements of Policy 1 relating to the mix of sizes and types of housing, self-build or affordable housing. It also includes any requirements of Policy 4 for developments of more than ten dwellings to be assessed for its cumulative impact on the environment. The Planning Practice Guidance advises that requirements placed on



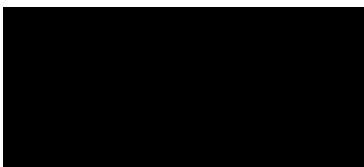
development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy.

Similarly, Policy 5 requires enhanced environmental standards, the justification for which would be better assessed as part of the district wide local plan examination. National standards for housing development are covered by the Future Homes Standards and changes to the Building Regulations regime and a NP policy which either duplicates or sets different requirements is unnecessary and likely to be unjustified.

Otherwise, 3West group generally support the proposed policy objectives of the other draft policies, subject to consideration of the relevant evidence base.

We would welcome the opportunity to comment further on the draft NP in due course.

Yours sincerely



David Matthews

Business and Operations Director



