

Angela King,
Planning Policy Team,
East Devon District Council,
Blackdown House,
Border Road,
Honiton, EX14 1EJ
[Sent via email]

Date: 18/6/21

Letter ref: CP/00531

Dear Sir/Madam

Colyton Parish Neighbourhood Plan 2020-2031 Submission Version

I write on behalf of Baker Estates Ltd to make representations on the Submission Version Neighbourhood Plan (NP) consultation. I act as planning consultant for Baker Estates Ltd.

Baker Estates Ltd have an interest in land within the plan area and welcomes the opportunity to comment on the NP at this submission version consultation stage. Baker Estates Ltd has an option on various parcels of land within the Neighbourhood Plan area. These land options are shown on the plan attached.

These sites have been submitted to East Devon District (the Council) through the 'call for sites' consultation in conjunction with the current preparation by the Council of a new Local Plan. The role of the settlements within the NP area and the role that they can play in meeting the development needs of the parish and the wider area will need to be properly assessed as part of the review of the strategic policies, which is overdue. It will be for the Council, as local planning authority, to determine which land is allocated through the new local plan to meet the development needs of the area during the new plan period. Baker Estates Ltd considers that the parcels of land which it has under option are worthy of consideration through this process as potential housing sites. That is not to say that it would necessarily be appropriate for all of this land to be developed. However, the sites when taken as a whole provide potential locations for

residential development, alongside associated publicly accessible recreational space or strategic landscaping. The Council should not be prevented from potentially identifying suitable sites for allocation in the new Local Plan because of NP policies which seek to unduly protect such land.

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 is being prepared at a time when the strategic policies to which it must relate are in need of being reviewed and updated. The East Devon Local Plan is due for a review. We note however that the draft NP does not seek to plan positively for the housing needs by setting a housing requirement for the plan area or allocating sites and so if this is the basis on which the NP is intended then it has to be expected that the weight that can be given to it will reduce as the Local Plan is replaced by up to date strategic policies which may require development within the plan area.

We note that draft NP policy Coly4 proposes broad areas of land within the NP area as Green Wedges. This repeats the similar designations set out within the current Local Plan which it is not necessary to do. In any case however, the justification for these designations will need to be reviewed as part of the preparation of the new Local Plan. The NP's evidence base appears to be lacking in any assessment work of its own or any technical evidence upon which such areas have been identified. Whilst we understand the objective of the policy, one which, if justified by evidence, simply sought to ensure that development did not result in the coalescence of the settlements but would not prevent otherwise suitable development on the edges of such areas, would meet the same aims without potentially constraining the delivery of important national policy objectives, such as the delivery of housing. We recommend such an approach replaces policy Coly4, to which we object in its current form, particularly as most of the land around it is within an Area of Outstanding Natural Beauty and, as the NP itself states, Colyton "*has adequate community infrastructure*" which makes it a potentially sustainable location to accommodate some appropriate growth through the emerging Local Plan period. It is unlikely that such appropriate growth could be achieved within the tightly drawn settlement boundary which the NP proposes.

Similarly, draft NP policy Coly8 would certainly appear to be constraining the delivery of important national policy objectives, which is one of the key basic conditions. We therefore object to policy Coly8 on this basis and consider that to make it consistent with the NPPF, the first line of the policy should be amended to read as follows,

Rural exception site proposals outside the built-up area boundary will be supported if it is demonstrated that.....

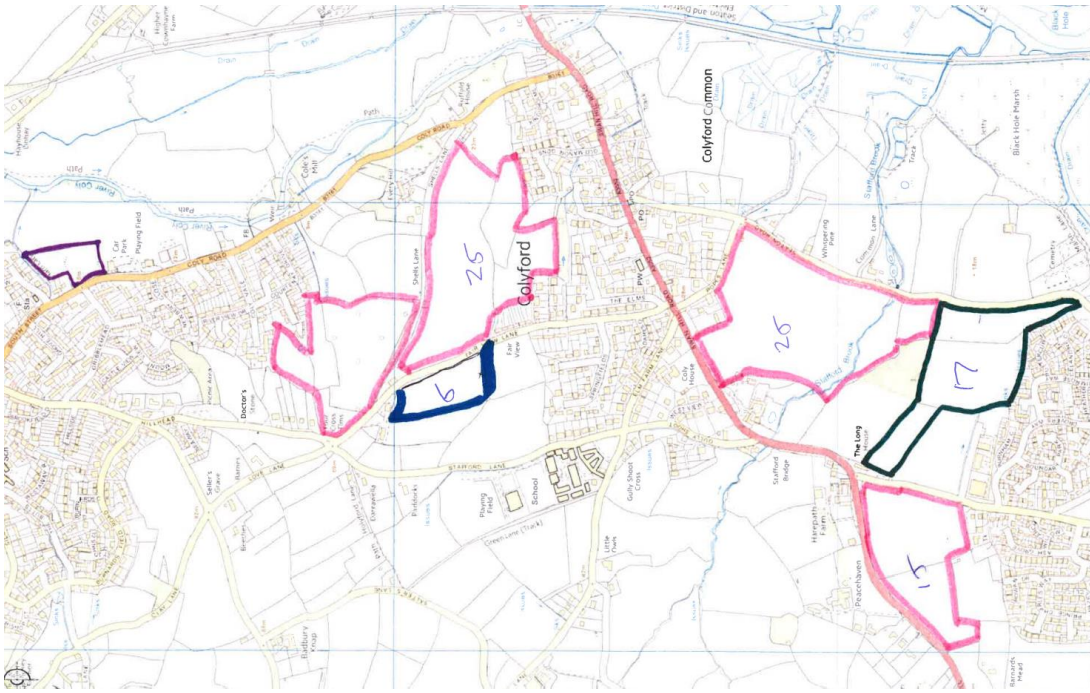
Otherwise, Baker Estates Ltd would generally support the proposed policy objectives of the other draft policies.

Baker Estates prides itself on the quality of its developments and the contribution they make to the needs of the local community. We would very much welcome the opportunity to engage with the Neighbourhood Plan Group and Parish Council regarding how development on its land within the parish could both meet development needs and potentially deliver benefits to the local community.

Yours faithfully

SIMON COLLIER

Director



- TITLE NO. DN 248184
- TITLE NO. DN 325923
- TITLE NO. DN 369958

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