

38th Interim Report from Lamerton Neighbourhood Plan Group to Lamerton Parish Council.

This Report is prepared by the Project Manager for the Lamerton Neighbourhood Plan Group for submission to Lamerton Parish Council at their meeting on 8th September 2026

1. Record of Actions and ongoing matters: Update since 16th June 2026

- (1) The Task Group (TG) that met on 15th June identified a number of residents' responses that related to the proposed allocation of Bull Field. After considering each of these, a draft of the issues raised was prepared;
- (2) It was agreed that the TG would seek advice from the Neighbourhood Plan Officer of WDBC (Alexis Wilson) as to how we needed to proceed in respect of the variance between the assessment by Aecom of the site behind Trenance both in relation to access and landscape, and the subsequent assessments in respect of Planning application (0172/26/OPA- now withdrawn) on the same site by WDBC landscape officer and DCC Highways.;
- (3) Alexis Wilson agreed to a virtual meeting to discuss this matter and the Council's own responses as a statutory consultee, and suggested the inclusion of senior planning officer Phil Baker. This was scheduled for 25th August;
- (4) **On 17th August 2026, the Government published a further revision of the National Planning Policy Framework (NPPF), which took immediate effect; this replaces the version published in 2024 which had been the policies that had informed the draft NP that went into Regulation 14 in May 2026**
- (5) The ethos of the new rules included in the 2026 NPPF is to facilitate the grant of planning consent, and remove barriers to development.
- (6) The planned meeting with WDBC Neighbourhood Plan Officer took place on 25th August and the attendees were able to consider the original areas of concern in the light of the new provisions;
- (7) As a consequence of the changes, Lamerton's draft Plan needs to be reviewed and revised against the provisions in the 2026 NPPF, as well as the responses of all consultees;
- (8) In respect of the queries raised in relation to the site behind Trenance, the recommendation of Alexis Wilson was that we should ask Aecom to address these matters. If the site is to be excluded from the draft NP, it is necessary that the amber assessment in the Aecom report be revised by them. The specifics of the planning application 0172/26/OPA do not advise the outcome of the site allocations in the NP;
- (9) If the site is downgraded to red, then it is appropriate that it is not included in the allocations in the NP and that the Plan can proceed on the basis there are no suitable sites to make a full allocation to meet Lamerton's assessed housing needs.

2. Key issues arising from a brief audit of the draft Plan in relation to the 2026 NPPF

- (1) Settlement boundary:- the boundary of the existing "built environment" may need to be reviewed in the light of planning consent created but yet to be built- behind Farriers (3217/25/OPA), and the site N of Green Hill (0107/22/OPA)
- (2) Housing policies:- the new policy states a neighbourhood plan *should not result in less development than is specified in the wider development plan.*

- (3) Viability and deliverability:- emphasis on availability, suitability, achievability (including viability), quantity and timescale;
- (4) Design policies - to ensure they are Lamerton specific;
- (5) Transport:- reviewing transport impacts and sustainable transport
- (6) Landscape:- placing more emphasis on local circumstances
- (7) Wildlife, Trees and Hedgerows:- must be justified in terms of *local-ness*;
- (8) Flood risk- locally specific rather than repeating national policies
- (9) Heritage:- locally specific rather than repeating national policies
- (10) Revising the draft plan to comply with the 2026 NPPF is going to require the Plan to be put forward for a new Reg. 14 consultation with residents.
- (11) Schedule 1 is a provisional *2026 NPPF Compliance Schedule* to inform a review; traffic light ratings have been applied to indicate the degree of potential variance from the new provisions and thus the extent of revisions likely to be required.

3. Next Steps for Council to consider and approve

- (1) Consider if there is a willingness to provide the man-power to complete a review of the draft Plan

There are currently 7 members of the NPGroup (approx 50%) who regularly attend Task Group meetings and 4 of those who have expressed a willingness to completing the audit and revisions if this has the support of Council:

Schedule 2- summary of progression of development of the NP since 2106

- (2) Consider if the Parish Council wishes to continue with the Neighbourhood Plan project

This was supported by the community in 2016, but on the basis that there would be no charge on the precept. To date, all costs have been met by Government funding and WDBC; WDBC (through our Ward Member, Neil Jory and Alexis Wilson the WDBC NP officer) has confirmed continuing support but all Government funding has been withdrawn. Future funding requirements cannot be identified at this stage

- (3) Write to Aecom

Schedule 3- Draft letter

1st September 2026

Karen Dreher

Project Manager, Lamerton Neighbourhood Plan Group

Schedule 1; provisional 2026 NPPF Compliance Schedule

Lamerton policy	What the Regulation 14 policy says	Relevant NPPF 2026	Status	What needs doing
H1	Settlement boundary	PM5, S4/S5, settlement definition	 Review	Check boundary methodology and Green Hill
H2	Sustainable housing	HC1, HC2, S1-S6	 Review	Check housing requirement and wording
H3	19 homes	PM5, HC1, HC2, PM9	 Important	Check relationship with Green Hill permission
H3a	Court Cottage	PM9, DP1-4, HO	 / 	Check deliverability/design
H3b	Behind Trenance	PM9, DP, N, TR, F	 / 	Check site-specific criteria
H3c	Bull's Field	PM9, DP, N, TR	 / 	Check site-specific criteria
H4	Rural Exception Sites	HC5 + rural housing policies	 Important	Check new rural affordable housing provisions
H5	Design	DP1-4	 Review	Remove duplication; retain local character
H5	Countryside conversions	S5, HO, DP	 Review	Check national policy interaction
H7	Transport	TR1-8	 Review	Local evidence/duplication
H8	Flood	F1-9	 Review	Local requirements
HGE1	Landscape	N1-6	 / 	Check local landscape justification
HGE2	Farm diversification	E / N policies		Check scope
HGE3	Local Green Space	HC / N		Check designation criteria
HGE4	Wildlife	N1-6		Biodiversity wording
HGE5	Trees/hedgerows	N1-6		Check national duplication
HGE6	Heritage	HE1-10	 / 	Strong local evidence
E1	Business	E1-4		Check local criteria
E2	Business expansion	E1-4		Check local criteria
E3	Employment sites	E1-4		Check evidence
LC1	Microgeneration	W1-4 / CC1-3		Important new energy policies

Green = broadly accords; amber = needs checking/amendment; red = potentially significant issue.

Schedule 2: Key factors impacting the development of the NP since 2106

- (1) First draft completed Reg 14 in 2019; as a consequence, changes were required which would have necessitated a further Reg 14 consultation;
- (2) 2020 - 2021: Covid impacted on meetings and progress;
- (3) By 2021, the original Housing Need Assessment was out of date; some of the sites assessed in the 2019 version had been delivered; a review was undertaken of the previous draft by Council and key issues identified;
- (4) 2022:- new NPGroup formed; new HNA and Call for Sites completed. Funding sought in order to complete public consultations;
- (5) 2023:- 2 public consultations completed (March and November);
- (6) 2024: Government published a new NPPF: this provided that any NP over 5 years old would cease to be taken into account (thus it would have rendered any previous Plan irrelevant); all policies had to comply with new national policies.
- (7) 2024:- Technical support obtained for Aecom to prepare Site Options and Assessment (completed October 2025) and Strategic Environmental Assessment (completed Feb 2026);
- (8) 2025: All new government funding for neighbourhood planning withdrawn;
- (9) 2026: draft plan completed in the light of the above 2 assessments and the 2024 version of the NPPF;
- (10) 2026: Plan published for Reg.14 -6 week consultation from 1st May.

Schedule 3: Draft letter to Aecom

To : ryan.putt@aecom.com
cc. emily.Baker@aecom.com
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Dear Ryan

Lamerton Neighbourhood Plan – Request for review and correction of AECOM Site Options Assessment: Land Behind Trenance

I write on behalf of Lamerton Parish Council in relation to the AECOM site assessment undertaken as part of the technical support provided for the Lamerton Neighbourhood Plan and on the advice of the Neighbourhood Planning Officer of WDBC.

Following the Regulation 14 consultation and subsequent discussions with West Devon Borough Council, it has become apparent that there are significant issues concerning the accuracy and completeness of the original AECOM assessment of **Land Behind Trenance**.

Council is therefore asking AECOM to **revisit and update its assessment of this site**, comparing the original assessment with the evidence that has subsequently emerged through planning application **0172/26/OPA** ¹.

This is particularly important because the site is currently proposed as an allocation under **Policy H3b of the Regulation 14 Neighbourhood Plan**, for up to five dwellings, including three or four affordable homes. The Parish Council needs to be satisfied that the evidence supporting this allocation remains robust before the Plan proceeds to Regulation 15 and Examination.

1. Issues identified since the original AECOM assessment

The original AECOM assessment concluded that the site was: "potentially suitable, available and achievable" and assessed a capacity of five dwellings.

However, the subsequent planning application 0172/26/OPA has raised a number of significant issues which were either not identified, or were assessed differently, in the AECOM report.

In particular, Council would ask AECOM to reconsider:

Access

DCC Highways Officer ² was extremely scathing of access for the site. The planning application has demonstrated that the practical access arrangements are considerably more problematic than the original assessment appears to have anticipated.

¹ link to planning application

² link to DCC highways report

Landscape

The planning application has also raised significant landscape concerns. WDBC's landscape officer ³ rated this site 'red', not amber.

Veteran trees

The original AECOM site assessment recorded: **"Veteran or ancient trees – No."**

The subsequent planning work has identified veteran trees on the site. TPO orders have now been placed on some of the trees on the site.

This is not simply a matter of additional detail. The presence of veteran trees has potentially significant implications for:

- the developable area;
- access;
- layout;
- arboricultural constraints;
- ecology;
- landscape character;
- and the achievable number of dwellings.

2. Withdrawal of planning application

The planning application **0172/26/OPA** was subsequently withdrawn.

The withdrawal itself, together with the issues that arose during the planning process, provides important new evidence concerning the suitability and deliverability of the site.

3. Relationship to Policy H3b

This review is particularly important because H3b currently relies on the site providing:

up to five dwellings, including three or four affordable homes, with the affordable homes being provided in a mix of dwelling sizes to respond to the 2022 Housing Needs Survey.

If the site cannot realistically accommodate five dwellings, or if the constraints identified through the planning application mean that development is no longer achievable, the Parish Council needs to know this before the policy is finalised.

Council does not consider it appropriate for the Neighbourhood Plan to rely upon an allocation which is supported by a site assessment that has subsequently been shown to contain material inaccuracies or omissions.

4. Request for AECOM to undertake the review

We would therefore be grateful if AECOM could:

1. **Revisit the original assessment of Land Behind Trenance and tests the original conclusions against what has actually been demonstrated through the planning application process;**
2. Review the evidence submitted in connection with planning application **0172/26/OPA**;
3. Specifically reconsider the original conclusions regarding:
 - access;
 - landscape;
 - trees and arboriculture;
 - veteran/ancient trees;
 - site capacity;

³ link to WDBC landscaper officer report

- and overall suitability and deliverability;
- 4. Identify any conclusions in the original assessment which are now no longer supported by the available evidence;
- 5. Confirm whether **five dwellings remains an appropriate assessed capacity**;
- 6. Provide an updated overall assessment/rating of the site; and
- 7. Advise whether the site remains suitable for allocation under H3b.

5. Cost of this work

The Parish Council has already invested in the AECOM technical support and the site assessment which forms part of the evidence base for our Neighbourhood Plan. The subsequent planning application has now identified material issues which appear to demonstrate that aspects of the original assessment were inaccurate or incomplete.

Council is aware that **Government funding for Neighbourhood Plan technical support has now ceased**. This leaves the Parish Council with no realistic source of additional funding for commissioning a replacement assessment.

In these circumstances, we request that AECOM treats this work as a **necessary review and correction of the original site assessment provided as part of the technical support for the Lamerton Neighbourhood Plan**, rather than as a new commission, and that it is therefore undertaken **at no additional cost to the Parish Council**.

We would be grateful if you could confirm that this is possible.

We are not asking AECOM to undertake a wholly new site assessment. Rather, we are asking AECOM to **review its own previous conclusions against material evidence that has subsequently emerged and some that was potentially assessable when the work was commissioned**, particularly where that evidence appears to demonstrate that the original assessment did not identify important constraints.

6. Importance to the Neighbourhood Plan

This matter is now particularly urgent because the Parish Council is reviewing the Regulation 14 Plan following consultation, the publication of the 2026 NPPF and is preparing the evidence and policies for the next stage.

The assessment of the three H3 sites needs to be robust and internally consistent.

In particular, we need to be able to demonstrate at Examination that the sites allocated under H3 are genuinely **suitable, available and achievable**, and that the housing capacities attributed to them are realistic. We would therefore appreciate AECOM's assistance in resolving this matter before the Plan progresses further, and without delay

We would be grateful for confirmation of receipt of this request and, importantly, confirmation that the review can be undertaken as a correction/update to the original technical support work **without further cost to the Parish Council**.

Yours sincerely,

[Name]

Clerk to Lamerton Parish Council

[Contact details]