

Woodbury Parish Neighbourhood Development Plan 2020-2031

**A report to East Devon District Council on the
Woodbury Parish Neighbourhood Development
Plan 2020 to 2031**

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Executive Summary

- 1 I was appointed by East Devon District Council in December 2025 to carry out the independent examination of the Woodbury Parish Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 11 December 2025.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding the character of the area and safeguarding existing community facilities.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Woodbury Parish Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
24 February 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Woodbury Parish Neighbourhood Development Plan 2020-2031 (the 'Plan').
- 1.2 The Plan has been submitted to East Devon District Council (EDDC) by Woodbury Parish Council (WPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding the character of the area and safeguarding existing community facilities.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case, and that referendum results in a positive outcome, the Plan would then become part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by EDDC, with the consent of WPC, to conduct the examination of the Plan and to prepare this report. I am independent of both EDDC and WPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 43 years' experience in various local authorities at either Head of Planning or Service Director level, and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan proceeds to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan;
- the various appendices;
- the Basic Conditions Statement;
- the Consultation Statement;
- the Environmental Assessment screening report (May 2024);
- the Habitats Regulations Assessment screening report (May 2024);
- WPC's responses to the Clarification Note;
- the representations made to the Plan;
- EDDC's e-mail of 3 February 2026;
- the adopted East Devon Local Plan 2013 to 2031;
- the adopted East Devon Villages Plan;
- the emerging East Devon Local Plan 2042;
- the National Planning Policy Framework (December 2024);
- Planning practice guidance; and
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 11 December 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations, I am satisfied that the Plan could be examined without the need for a public hearing.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In this context, WPC has prepared a Consultation Statement. It sets out the mechanisms used to engage all concerned in the plan-making process. The matter is more complicated as the Plan has developed over time and in distinct phases
- 4.3 The Statement also reproduces material used at some of the consultation events. This gives an added depth to the document.
- 4.4 The Statement provide details on the comments received during the consultation process for the pre-submission version of the Plan (June-July 2024). It identifies the principal changes that worked their way through into the submitted version. This process helps to describe the evolution of the Plan.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Plainly it has been more complicated than normal due to the protracted preparation period for the Plan. Nevertheless, advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I am satisfied that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. EDDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Representations Received

- 4.6 Consultation on the submitted plan was undertaken by EDDC and finished on 27 November 2025. This exercise generated comments from the following organisations:
- 3West Group Limited
 - Devon County Council
 - East Devon District Council
 - Historic England
 - LRM Planning
 - Ministry of Defence
 - National Highways
 - Natural England
 - NHS Devon ICB
 - FWS Carter and Sons
 - South West Water
 - Sport England

- Devon Countryside Access Forum

4.7 Comments were also received from residents.

4.8 I have taken account of the various representations in examining the Plan. Where it is appropriate to do so, I make specific reference to the individual representations in Section 7 of this report.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Woodbury. It was designated as a neighbourhood area on 12 June 2013. In 2021 its population was 3667 persons. As the Plan describes, it is a thriving community of mixed ages, occupations, and aspirations. The Plan advises that it is within Exeter's area of economic activity and contains several business parks.
- 5.2 The neighbourhood area includes three distinctive villages -Woodbury, Woodbury Salterton, and Exton. It is also the home to RMTCLympstone which has a significant economic and residential influence on the parish. The neighbourhood area is fringed at its western boundary by the River Exe and parishes on the lower Clyst valley. On its eastern boundary is the expanse of Woodbury Common, which rises to a height of 180m above sea level and is part of the East Devon National Landscape. To the south the Parish extends towards Exmouth and in the north, it is bounded by the A3052.
- 5.3 The Parish is well placed for links to the rest of the country, featuring a branch line railway station at Exton and being near to Junction 30 of the M5 motorway. Exeter Airport is also within easy commuting distance. In the round it is a very interesting area within which to prepare a neighbourhood plan.

Development Plan Context

- 5.4 The East Devon Local Plan 2011-2031 was adopted in January 2016. It sets out the basis for future development in the District. Policy Strategy 1 comments that planned provision (including existing commitments) will be made for a minimum of 17,100 new homes in the 2013 to 2031 period and for development on around 150 hectares of land for employment purposes. The overall spatial development approach is as follows:
- East Devon's West End will accommodate significant residential development and major employment development to attract strategic inward investment along with supporting infrastructure and community facilities;
 - The seven main towns of East Devon will form focal points for development to serve their own needs and the needs of surrounding rural areas; and
 - The Local Plan will set out how development in smaller towns, villages and rural areas will be geared to meeting local needs.
- 5.5 The following policies are particularly relevant to the Woodbury Parish Plan:

Strategy 6	Development in Built-Up Area Boundaries
Strategy 7	Development in the Countryside
Strategy 27	Development and the Small Towns and Larger Villages
Strategy 28	Sustaining and Diversifying Rural Enterprises
Strategy 38	Sustainable Design and Construction
Strategy 49	The Historic Environment

The Local Plan also includes an extensive suite of development management policies.

Woodbury is identified in the list of settlements in Policy Strategy 27. In this context communities can promote development other than that which is supported through the Local Plan. This approach involves the production of a Neighbourhood Plan or the promotion of community-led development.

- 5.6 In July 2018 EDDC adopted the East Devon Villages Plan. It defines a range of Built-Up Area Boundaries for a series of villages including Woodbury.
- 5.7 EDDC has made good progress in terms of its preparation of a new Local Plan which will address the period up to 2042. The second Regulation 19 Local Plan Consultation ran from November 2025 until January 2026. The Plan proposes the allocation of land for housing development in Woodbury (Wood 6/9/10/16/20), in Exton (Wood 1/28) and on the edge of the parish (GH/ED/72a). The Local Development Scheme (October 2025) advises that its submission is planned for Spring 2026 with adoption in 2027.
- 5.8 The submitted Plan has been prepared correctly and properly within this current adopted development plan context. In doing so, it has relied on the information and research that has underpinned existing planning policy documents in the District. It also takes account of the emerging Local Plan. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Unaccompanied Visit

- 5.9 I visited the neighbourhood area on 11 December 2025. I drove into Woodbury from the A3179 from Clyst St George. This gave me an initial impression of its position in the wider landscape and its proximity to Exeter. I noted the scale and significance of traffic levels along this part of the highway network.
- 5.10 I looked initially at the village centre in Greenway. I saw the significance of School and the Village Hall.
- 5.11 I then drove to Woodbury Salterton along White Cross Road. I saw the significance of the Primary School, Holy Trinity Church, and the Diggers Rest in the village. Thereafter I looked at the Greendale Business Park.
- 5.12 I then drove back to Clyst St George and then to Exton. I saw the significance of the railway station and the Puffing Billy PH. I walked along Exton Lane and saw a range of houses, including several large, modern houses which had been designed to secure views of the River Exe to the west. I also saw the extensive use of the Exe Valley Trail as it passes through the village.
- 5.13 I then walked along the River Exe Trail to Lympstone Commando station. I left the neighbourhood area by driving along the A376 (Exmouth Road) to the M5.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.

6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are of relevance to the Woodbury Parish Neighbourhood Plan:

- a plan-led system – in this case the relationship between the neighbourhood plan and the development plan context described in Section 5 of this report;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms subject to the recommended modifications included in this report. The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding the character of the area and safeguarding existing community facilities. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. It also advises that policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies on housing development (Policy 1), small businesses (Policy 12), and rural diversification (Policy 13). In the social dimension, it includes policies on local green spaces (Policy 11), and on community facilities (Policy 15). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has specific policies on green energy (Policy 5), and on biodiversity and wildlife (Policies 8 and 9). WPC has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in East Devon District in paragraphs 5.4 to 5.8 of this report.

- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.

- 6.15 In order to comply with this requirement, EDDC prepared a screening report to accompany and underpin the Plan. The report (May 2024) is thorough and well-constructed. It concludes that, notwithstanding that the neighbourhood area is in an environmentally sensitive area in the District, the nature of the Plan is considered unlikely to have any significant environmental impact beyond that has previously been identified through the SEA of the Local Plan. It also advises that should impacts arise, there is a Mitigation Strategy in operation which would secure mitigation payments from new housing linked to offsetting impact of any increases in visitor numbers/recreational pressures arising, including through the implementation of management plans and the provision of alternative green spaces. The report concludes that the impact of the policies in the plan is not considered to require further analysis through a bespoke SEA.

Habitats Regulations Assessment

- 6.16 EDDC also prepared a HRA screening report at the same time. The resulting report is both thorough and comprehensive.

- 6.17 The assessment demonstrates that there is potential for significant effects on two European sites - the Exe Estuary RAMSAR, SPA, SSSI and the Pebblebed Heaths SAC, SPA, SSSI through recreational pressure from residents. The report advises that an Appropriate Assessment has been carried out and strategic mitigation is in place through Strategy 5 of the East Devon Local Plan, implemented through the South-East Devon European Site Mitigation Strategy which is designed to accommodate the identified level of development envisaged.

- 6.18 The screening report concludes that the Plan is not considered to propose a level of development over and above that in the adopted Local Plan (which was itself subject to HRA). It is considered that the scale of development that could be supported through the neighbourhood plan can be appropriately mitigated through the existing strategic mitigation that exists. It should be noted that work in progressing on the preparation of the new Local Plan for East Devon and this includes an updated Mitigation Strategy (commissioned). It comments that whilst this will not be in place for some time, it will apply in due course to proposals being considered under the Plan's policies once adopted. On this basis the report concludes that it is considered that, in combination with the Local Plan Policy, there will be no impact on the integrity of the European sites.

- 6.19 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with the appropriate regulations.

Human Rights

- 6.20 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.21 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that they have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and WPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. Where necessary, I have identified the inter-relationships between the policies.
- 7.6 For clarity, this section of the report comments on all policies whether I have recommended modifications to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial section of the Plan (Section 1)

- 7.8 The initial part of the Plan set the scene for the range of policies. It does so in a proportionate way.
- 7.9 Section 1 of the Plan comments about the general background to the neighbourhood area and to the Plan, how it has been prepared and how it will be used. It includes a map of the neighbourhood area. Whilst the front cover comments about the Plan period, I recommend that these details are included in the Plan itself. I also recommend that the Plan identifies the purpose of the map of the neighbourhood area. Whilst the Plan period is short, I am satisfied that it reflects the Plan period of the existing Local Plan.

At the end of paragraph 1.1 add: 'The Plan period is 2020 to 2031. The neighbourhood area is shown on the map on Page 1 of this document.'

- 7.10 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1: New Housing Developments

- 7.11 The context to the policy is WPC's recognition that whilst housing development is needed to maintain schools and local facilities, new development needs to be appropriate for the area in design, cost, and size. The Plan comments that houses are required for those entering the property ladder, moving up the ladder and for those moving back down the ladder. The lack of suitable housing for an ageing population who wish to downsize yet remain in the Parish causes stagnation in the housing market.
- 7.12 The policy includes the following principal elements:
- housing development proposals for multiple dwellings must provide a mix of sizes and types including opportunities for self-build and affordable housing as indicated by the latest Housing Needs Survey (currently Live West Housing Association 2022);
 - high design quality should conform to the local character as set out in the Woodbury Design Guidance document (Appendix C); and
 - development must be in sustainable and accessible locations and will have access to regular and reliable public transport, existing footpaths, and cycleways.
- 7.13 In general terms the policy takes a positive approach to these matters and has regard to Sections 5 and 11 of the NPPF.
- 7.14 I have carefully considered the representations from EDDC, 3West Group and the Devon Countryside Access Forum very carefully. I note that 3West Group considers that the submitted Plan should address strategic housing needs in a more positive way. Nevertheless, national planning guidance provides considerable flexibility for a qualifying body to determine the contents of its Plan. Furthermore, I note that the emerging Local Plan proposes the allocation of sites for housing development both in Woodbury and in Exton. Nevertheless, I recommend that the supporting text highlights this matter.
- 7.15 In this broad context I recommend the following package of modifications to bring the clarity required by the NPPF and to allow EDDC to be able to apply the policy through the development management process:
- ensuring that the first part of the policy dovetails with EDDC's strategic approach to housing development and the thresholds for the delivery of specific house types;
 - the simplification of the second part of the policy, including the reference to future work on design;
 - ensuring that the policy uses wording which acknowledges the role of a neighbourhood plan within the overall development plan; and
 - recasting the fourth part of the policy so that it is clearer on its requirements.
- 7.16 During the examination EDDC advised me of WPC's intention to update its design guidance shortly as a separate task. I recommend that an additional paragraph of

supporting text in the Plan to highlight WPC's intention to update its design guidance shortly as a separate task.

- 7.17 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'In accordance with thresholds set by Local Plan policy, housing development proposals for multiple dwellings should provide a mix of sizes and types that reflects identified local needs as indicated by the latest Housing Needs Survey, including, where relevant, opportunities for self-build and affordable housing for social rent.'

Development proposals should deliver high-quality design which conforms to the local character as set out in the Woodbury Design Guidance document (Appendix C) and is in keeping with the local surrounding area by virtue of an appropriate scale, mass, height, size, layout and density, and the use of appropriate materials.

Development proposals should be in sustainable and accessible locations and have access to regular and reliable public transport, existing footpaths and cycleways enabling reduced dependency on car use whilst also recognising the importance of disabled access.

Development proposals should respond positively to their immediate locality and avoid any adverse environmental impacts. Where an environmental impact is unavoidable, proposals should incorporate appropriate mitigation measures.'

At the end of paragraph 2.4 add: 'East Devon District Council is addressing the strategic delivery of new housing up to 2042 as part of the preparation of its emerging Local Plan. Sites are proposed for new housing in both Woodbury and Exton in that Plan.'

Add a new para of text to read (2.11): 'The policy relies on the existing Woodbury Design Guidance (appendix C) to underpin the second part of Policy 1. The Parish Council will be updating the Design Guidance shortly. Any review of the Plan will incorporate the revised Design Guidance.'

Policy 2: Retention of Affordable Homes

- 7.18 The policy advises that new dwellings originally built and intended to be used as affordable housing must be made available in a way that they can be retained as affordable housing.
- 7.19 In its response to the clarification note WPC explained its intention for the policy which overlaps with the details in paragraphs 2.4 and 2.5 of the Plan. I have considered this matter very carefully, and have taken account of EDDC's comments. On the one hand, the purpose of the policy is very clear and appropriate. However, on the other hand, I am not satisfied that its intentions are land-use based and can be applied through the development management process. This acknowledges that the occupation of

affordable housing is controlled through the provisions of the Housing Acts and/or associated legal agreements secured when planning permissions were granted. In addition, national legislation provides for occupiers to increase their level of ownership in shared homes or for homes to be used or owned in different ways.

- 7.20 In these circumstances I recommend that the policy is deleted. In recommending this approach I am satisfied that EDDC will be able to continue its current approach towards the management and use of existing affordable homes.

Delete the policy

Delete the supporting text

Policy 3: Accessibility of New Development

- 7.21 This policy comments about the accessibility of new developments. It has two related parts as follows:

- proposals for new housing development must demonstrate, through a Transport Assessment, how safe access to sustainable transport, including dedicated cycleways, walkways and public transport, have been included in the scheme; and
- new housing developments must provide pedestrian access to link up with existing or proposed footpaths.

- 7.22 I have noted EDDC's representation on this matter and WPC's responses. On the balance of the evidence, I recommend that the following modifications are included within the policy to bring the clarity required by the NPPF:

- in the first part of the policy include a proportionate element;
- in the first part of the policy acknowledge that Transport Assessments are only required for major development proposals; and
- ensuring that the second part of the policy is applied in a more general way rather than one focused entirely on works to highways and that the requirement should be applied where it is practicable to do so.

- 7.23 I also recommend a modification to paragraph 3.8 of the supporting text. Whilst the new developments outside the parish highlighted will have increased traffic levels in the parish, there is no direct evidence that they will have added to unspecified congestion.

- 7.24 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'As appropriate to their scale, nature and location, proposals for new housing development should demonstrate how safe access to sustainable transport, including dedicated cycleways, walkways and public transport, have been included in the scheme. In the case of major developments this should be through a Transport Assessment.'

Wherever practicable, new housing developments should provide pedestrian access to link up with existing or proposed footpaths, ensuring that the public can walk safely to access local services and facilities and public transport, including where necessary, providing safety measures to enable the safe crossing of roads.'

Replace paragraph 3.8 with: 'Developments outside, but adjacent to, the Parish such as the major housing developments at Goodmores Farm and other sites in Exmouth result in increased through traffic throughout the Parish.'

Policy 4: Assessment of Cumulative Impact

- 7.25 The Plan advises that the context to the policy is that the parish sits on important access routes from growing centres of housing to centres of employment, leisure, and community services. It comments that Exmouth acts as a dormitory town to Exeter and the associated business parks and employment areas. As both the residential footprint of Exmouth increases and more businesses are actively recruited to East Devon then transport links become even more important. The need to improve transport links has reached a critical stage. The Plan concludes that current traffic volume and speed through Woodbury have been independently monitored and shown to be consistently excessive.
- 7.26 The policy advises that any development of more than ten dwellings within the Parish must have an assessment of the cumulative impact on the environment which takes account of any other development that has been granted or is known to be strategically planned within the Parish or adjacent to the Parish boundary.
- 7.27 I noted the level of traffic in the neighbourhood area during the visit. I saw the level of traffic on the B3179 and the way in which it linked Exeter to Exmouth and Budleigh Salterton.
- 7.28 3 Group West comment that:
- '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.'*
- 7.29 In its response to the clarification note WPC reinforced its view that the policy is both required and locally distinctive given the impact of traffic from strategic developments on the parish.
- 7.30 I have also considered EDDC's comments which advise that the policy should be focused on traffic issues.

- 7.31 On the one hand, the policy reinforces the responsibility of EDDC and Devon County Council (as the highways authority) to assess the impact of new development as part of the development management process. On the other hand, I am satisfied that there are locally-distinctive matters in the neighbourhood area which can usefully be addressed in a neighbourhood plan policy. In this context I recommend that the policy is recast so that it initially sets out a general requirement for new development within which the substantive element of the policy (as submitted) would then support. The recast policy also ensures that its focus is on highways matters. This directly addresses the proper concerns raised by 3 Group West and EDDC.
- 7.32 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should be designed and located so that they can be accommodated within the capacity of the local highway network.

Development proposals of more than ten dwellings within the Parish should be accompanied by an assessment of their impact on the local highway network which takes account of the cumulative impact of other development that has been granted or is known to be strategically planned within the Parish or adjacent to the parish boundary.

Development proposals that would have a net negative impact on the local highway network will not be supported, unless suitable mitigation measures are included within the associated planning application or an overriding public benefit can be demonstrated.’

Policy 5: Green Energy Initiatives

- 7.33 The context to the policy is that the community has expressed support for green initiatives including sustainable transport, maximising energy efficiency in the design of new buildings and encouraging the use of low carbon sources in energy production. On this basis the Plan aims to support Woodbury by encouraging the use of renewable and low carbon technology initiatives.
- 7.34 The policy advises that new power generation will be supported when generated from renewable sources and that associated energy storage will also be supported. It comments that any such facilities must be designed and sited to avoid adverse landscape, visual and environmental impact.
- 7.35 3 Group West comments that:
- ‘(the policy) 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.’*

- 7.36 I have considered this representation carefully. However, I am satisfied that the policy offers support for sustainability initiatives rather than requiring their provision. On this basis I am satisfied that the approach taken has regard to Section 14 of the NPPF and Written Ministerial Statement on Local Energy Standards 2023.
- 7.37 I have noted the comments made by EDDC and WPC's responses to those comments. On the balance of the evidence, I recommend that the policy is recast so that its approach is clearer, it incorporates some of EDDC's suggestions and would apply the third part of the policy in a proportionate way. In combination these recommended modifications will bring the clarity required by the NPPF and allow EDDC to be able to apply its contents through the development management process.
- 7.38 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals for power generation from renewable and low carbon sources (and associated energy storage) will be supported. Any such facilities should be designed and sited to avoid adverse landscape, visual and environmental impact.'

The incorporation of sustainable initiatives within new developments including but not limited to those in paragraph 4.9 of the Plan will be supported.'

As appropriate to their scale, nature, and location, and where it is practicable to do so, development proposals should be accessible to sustainable transport.'

Policy 6: Vehicle Parking Requirements

- 7.39 The policy advises that development proposals resulting in a new or enlarged dwelling must meet a series of criteria.
- 7.40 In general terms the policy has regard to Sections 8 and 9 of the NPPF. I recommend modifications to the opening element of the policy and to the third criterion to bring the clarity required by the NPPF and to allow EDDC to apply through the development management process. I also recommend that the wording throughout the policy acknowledges the role of a neighbourhood plan within the wider development plan.
- 7.41 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: 'Development proposals for a new or enlarged dwelling should meet the following criteria:'

Replace criterion 3 with: 'Proposals should not result in the loss of off street car parking spaces for existing dwellings where it would lead to on-street parking that would be detrimental to highway safety.'

Throughout the remainder of the policy replace 'must' with 'should'

Policy 7: Landscape Enhancement

- 7.42 The policy has two parts. The first advises that proposals for development must detail how existing trees, Devon banks, and hedges within or adjacent to the development site will be protected or enhanced. It also comments that new planting of trees, Devon banks and hedges are encouraged to increase tree cover and hedgerows within the Parish. Finally, it comments that where new landscaping is proposed native species of local provenance are favoured and the siting of trees must take account of their canopy and root development.
- 7.43 The second part seeks to safeguard views within the neighbourhood area and views from within the parish to areas outside the parish.
- 7.44 I am satisfied that the first part of the policy takes a positive approach and has regard to Section 15 of the NPPF. Nevertheless, I recommend that it is recast to bring the clarity required by the NPPF.
- 7.45 In its response to the clarification note WPC explained that it had chosen not to identify specific views to be included in the policy. Whilst I understand its approach, and the associated scale of the task, the policy as submitted would be very difficult to be applied by EDDC through the development management process. In addition, the supporting text does not provide any information on this matter. Whilst I note that Map 2 (in Appendix A) shows some viewpoints in Woodbury as part of earlier work by EDDC on the Woodbury Conservation Area Appraisal, that work relates simply to Woodbury and the Appraisal does not include the level of detail required for a view to be identified in a neighbourhood plan.
- 7.46 Similarly, whilst the content of a neighbourhood plan is matter for the qualifying body's judgement, plans which have successfully included such a policy are underpinned by a proportionate assessment of a package of identified views. In all the circumstances I recommend the deletion of the second part of the policy.
- 7.47 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals should respond positively to existing trees, Devon banks, and hedges within or adjacent to the development site. Wherever practicable development proposal should incorporate additional vegetation of this type within their overall layout.

Where new landscaping is proposed, native species of local provenance should be used and the siting of trees must take account of their canopy and root development.'

Policy 8: Biodiversity Enhancement

- 7.48 This is a general policy on biodiversity. It has two related parts. The first comments that for any new development, wherever possible, existing habitats and ecosystems must be protected. All significant developments requiring planning application must

demonstrate the delivery of biodiversity net gain with the use of a recognised biodiversity metric. The second comments that the minimum biodiversity net gain will be in line with East Devon District Council policies and is required to be on the application site or within the Parish.

- 7.49 I sought advice from WPC on the extent to which the policy brings any added value beyond national and local planning policies. In its response it commented that the policy was intended to set EDDC's approach as a minimum requirement to be exceeded where practicable.
- 7.50 I have considered this issue carefully. The ambitions of the first part of the policy are now addressed by national legislation on biodiversity net gain. The second part of the policy restates the approach taken in existing EDDC policies. National policy is clear that neighbourhood plan policies do not need to repeat or restate national and local planning policies. In these circumstances I recommend the deletion of the policy.

Delete the policy

Policy 9: Support for wildlife within new developments

- 7.51 This policy sets out requirements for new development in relation to wildlife.
- 7.52 In general terms the policy takes a positive approach to this matter and has regard to Section 15 of the NPPF. Nevertheless, I recommend that the policy is recast so that it can be applied in a proportionate way. This acknowledges that the requirements of the policy will not necessarily apply to minor and domestic proposals. I also recommend that the final element of the policy is free-standing rather than one of a series of criteria in the main part of the policy.
- 7.53 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'As appropriate to their scale, nature and location, development proposals should make provision for wildlife which:

- **incorporates swift bricks;**
- **includes bat boxes and barn owl boxes, especially where existing buildings are to be demolished;**
- **protects or establishes permeable and ideally planted boundaries that permit the movement of hedgehogs;**
- **include solitary bee boxes, bee bricks, and insect houses; and**
- **retains existing and where practicable plant new native trees, shrubs, and hedges to create green corridors for wildlife.**

All such provision of facilities for wildlife should be appropriately located on or adjacent to the development site.'

Policy 10: Conservation of Heritage

- 7.54 The policy comments about the built heritage of the parish. It advises that any designated or non-designated heritage assets in the Parish, and their settings, must be conserved and where possible enhanced for their historic significance and importance regarding their local distinctiveness, character, and sense of place.
- 7.55 In relation to designated heritage assets the policy does not add to the approach taken in national and local planning policy.
- 7.56 In relation to non-designated heritage assets (NDHAs) WPC advised in its responses to the clarification note that the policy was intended to underpin the future identification of NDHAs in association with EDDC. Notwithstanding that other neighbourhood plans in East Devon have similar policies, good practice commonly found elsewhere is to include a schedule of proposed NDHAs. This provides clarity for all concerned. In this case there is no such information. Furthermore, once any NDHAs are identified any future development proposals for such assets would be determined against national and local planning policies on this matter, including paragraph 216 of the NPPF.
- 7.57 In all the circumstances I recommend the deletion of the policy. The future identification of NDHAs can be addressed in any review of the Plan.

Delete the policy

Delete paragraphs 6.8 to 6.11

Policy 11: Green Spaces

- 7.58 The policy advises that proposals for development on green and community spaces will not be supported unless it is demonstrated that such development will result in a net increase in the community value of that space or assets, and features on it, or there is new provision of equal or enhanced community value.
- 7.59 I note that the Plan does not define any open and green spaces. As EDDC point out this will make the application of the policy through the development management process challenging. I recommend that the policy is modified so that it uses the definition on the policy's objectives to identify the remit of the policy. I also recommend that it is recast so that its initial element takes a positive approach.
- 7.60 The recommended modification to the first part of the policy builds in safeguards in relation to the biodiversity importance of open and green spaces. This will be particularly important in relation to the Pebblebed Heaths SAC/SPA in achieving an appropriate balance between access/recreation on the one hand and its appropriate conservation on the other hand.
- 7.61 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals that would enhance the use and accessibility of public and communally used open and green spaces, including village greens, recreation and sports grounds, allotments, and common land will be supported subject to the avoidance of adverse biodiversity impacts.

Development proposals that would involve the loss of public and communally used open and green spaces, including village greens, recreation and sports grounds and allotments, or which would detract from the attractiveness and accessibility of such spaces will not be supported unless it is demonstrated that the development:

- **will result in a net increase in the community value of that space or assets, and features on it, or**
- **the proposal involves a replacement for the facility which is of equal or enhanced community value to that of the existing use.’**

Policy 12: Small Business Development

7.62 The context to the policy is the Plan’s commentary that the parish is already a key area with successful commercial and agricultural businesses operating locally and within the wider Exeter, Devon, and South West economy. They provide valuable business and employment opportunities for many residents.

7.63 The policy has two related parts. The first comments that other than where it is allocated for development in the East Devon Local Plan, or otherwise clearly allowed for under local plan policy, the expansion of established business premises will not be supported beyond existing business premises operational boundaries. The second comments that small extensions to the buildings of existing businesses or the sympathetic conversion of existing buildings will be supported where a series of criteria are met.

7.64 The Greendale Business Centre (GBC) comments that:

‘(it) a major local employment area which is home to approximately 220 businesses ranging from long-standing multi-national companies to small start-up enterprises. There are currently approximately 3,000 employees working across the GBP.

The GBP has expanded incrementally over the years in response to considerable market demand. There has, and continues to be, significant interest in operating at GBP, especially among small-medium sized enterprises (SMEs), due to the provision of good quality, affordable accommodation. Rental levels are considerably lower than other employment locations within the authority area and given the ongoing inflationary pressures and consequential economic challenges facing many businesses, affordable accommodation is crucial to their long-term sustainability.

The continued success and expression of confidence in the Business Park has been a catalyst for the owners to investigate the potential for further future expansion. It is the objective of FWS Carter and Sons to undertake the expansion is a planned and

coordinated manner. To that end, a masterplan for the expansion of the GBP has been prepared and this submitted to East Devon District Council (EDDC) through the Local Plan process in order to inform the allocation of areas for growth.

Yet despite this very positive recognition of the importance of economic growth to livelihoods and well-being, and the acknowledgement that business and economic conditions are constantly changing, the WNP applies a blanket moratorium on the growth of the existing (and demonstrably successful) business parks beyond their current footprint. This moratorium on their future growth appears to be at odds with the generally positive support for business in the WNP

(Businesses) need the opportunity to establish and grow. The GBP has provided that opportunity, providing suitable, low-cost space but it is now at capacity. There is a long list of businesses of different sizes looking for new accommodation and whom have registered their interest for space on the GBP. There is unfortunately simply not the space available however to accommodate these requirements within the existing footprint of the Business Park.

For that reason, we strongly object to the proposed moratorium on the growth of the existing GBP at Paragraph P12.1 in Policy 12. There is no evidence to support such a moratorium and indeed doing so would conflict with the broader objectives of supporting small business growth within the Neighbourhood Plan area. We therefore recommend that Paragraph P12.1 of Policy 12 is deleted.'

7.65 I have considered the first element of the policy carefully. On the one hand, it seeks to safeguard the character and nature on the parish. On the other hand, it takes a very matter-of-fact and prescriptive approach and which does not necessarily have regard to Section 6 of the NPPF. On the balance of the evidence, I am not satisfied that it meets the basic conditions and as such recommend its deletion. In reaching this conclusion I am satisfied that EDDC will be able to address the scale, nature, and location of employment land in its emerging Local Plan. I also note that EDDC has addressed proposals for the expansion of the GBC as part of its ongoing work on the emerging Local Plan.

7.66 In general terms, the second part of the policy has regard to Section 6 of the NPPF and will provide the opportunity for appropriate and sensitive business development and expansion. I note that the submitted policy overlaps with the approach taken in Policy E7 of the adopted Local Plan. Whilst Policy E7 is not a strategic policy, it provides clear guidance on extensions to existing employment sites, and advises that it does not apply at the Hill Barton and Greendale Business Parks. I also note that the Local Plan was adopted in January 2016, and that the NPPF has been updated several times since that point. In this context paragraph 85 of the December 2024 NPPF advises that:

'Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with

high levels of productivity, which should be able to capitalise on their performance and potential.'

- 7.67 Taking account of all the relevant information. I recommend that the second part of policy is recast so that it relates more appropriately to the development management process, and provides an appropriate level of detail for EDDC to determine planning applications. In doing so, I recommend that the first criterion about development plan policies is deleted (as it is unnecessary), and is replaced by a criterion on the proportionate nature of proposals for extensions (rather than the unspecified reference to small extensions in the opening part of the policy). I also recommend consequential modifications to the supporting text. Whilst paragraph 7.4 comments about retrospective applications this is ultimately a process matter for EDDC rather than for commentary in the neighbourhood plan. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'Development proposals for the extension of existing businesses or the sympathetic conversion of existing buildings to employment use will be supported where the following criteria are met:

- **the size of the extension is proportionate to the scale of the premises concerned and can be accommodated within the existing curtilage of the premises;**
- **the premises are within accessible locations and would not generate a significant increase in vehicle movement;**
- **the proposal would respond positively to safeguarding the amenities of adjoining or nearby residential properties; and**
- **a commercial justification for larger business premises can be demonstrated and which cannot be met elsewhere in the vicinity.'**

Delete paragraphs 7.3 and 7.4.

Policy 13: Rural Diversification

- 7.68 The Plan advises that the local community wish to encourage economic diversity within the agricultural and rural economy whilst at the same time preventing heavy transport vehicles from creating lasting damage to the surface and sub-base of rural roads.
- 7.69 The policy comments that re-use of farm and other rural buildings will be supported for business or tourism purposes provided that the proposed use is small scale and where on an operational farm it is subservient to the farm and its operations.
- 7.70 In general terms the policy takes a positive approach to these matters and has regard to Section 6 of the NPPF. In this context I recommend that the policy is recast so that it has a simpler, criteria-based format. In doing so, I recommend that an additional criterion is inserted to address the relationship between the development proposal and the capacity of the local highways network. This will deliver the community's ambitions as set out in paragraph 7.7 of the Plan.

- 7.71 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘Development proposals for the re-use of farm and other rural buildings for business or tourism purposes will be supported where:

- **the proposed use is small-scale;**
- **if on an operational farm, the use is subservient to the farm and its operations;**
- **they respond positively to the surrounding landscape or environment;**
- **they respect the amenities of adjoining or nearby residential occupiers;**
- **they can be accommodated within the local highway network; and**
- **they ensure that buildings are converted to a standard that meets the design guidelines set out in Appendix C.’**

Policy 14: Equine Activities

- 7.72 The policy advises that equestrian development will be supported where it meets a series of criteria.

- 7.73 In general terms the policy takes apposite approach to this matter, and reflects the largely rural nature of the neighbourhood area. In this context I recommend that the criteria are modified to ensure that they have the clarity required by the NPPF and can be applied by EDDC through the development management process. In doing so, I recommend the deletion of the commentary about the size of equestrian development in the first criterion as it is already addressed in the supporting text.

- 7.74 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Equestrian development will be supported where it:

- **is of a scale and/or an intensity of equestrian use which will be compatible with the landscape and its special qualities, and demonstrates sensitive design which responds to local character and distinctiveness including location and siting;**
- **is well-related to existing infrastructure including vehicular and field access. Any field shelters should be located adjacent to existing vegetation. Native planting should be provided where existing vegetation is insufficient to screen the building concerned;**
- **re-uses existing buildings on a farm or holding wherever practicable and viable. Covered ménages or arenas should utilise existing agricultural buildings;**
- **locates new buildings, stables, yard areas and facilities adjacent to existing buildings whilst ensuring that they respect the amenities of surrounding properties and uses. Any new buildings should be**

established as a block, near to existing dwellings or farm buildings from which they will be managed, to improve security, reduced visual impact and minimise the footprint; and

- **provides new or supplementary native planting, and boundary treatments which are consistent with local character, where appropriate.'**

Policy 15: Loss of community facilities

- 7.75 This policy looks to safeguard community facilities. It advises that development proposals which will result in the loss of a facility will only be supported where one of three criteria is met.
- 7.76 In its response to the clarification note WPC clarified that it had decided not to identify specific facilities in the policy. On the balance of the evidence, I am satisfied that the policy has sufficient clarity to be applied by EDDC through the development management process.
- 7.77 In this context, I recommend the following modifications to bring the clarity required by the NPPF and to allow EDDC:
- a recasting of the initial element of the policy so that it more comfortably applies to the development management process;
 - ensuring that the first criterion is reasonable and does not require that any replacement facility is more appropriate than the existing facility; and
 - simplifying the second criteria, both generally and to acknowledge that decisions on any such proposals will be made by EDDC based on all the relevant information.
- 7.78 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals which would result in the loss of a community facility will only be supported where one of the following criteria is met:

Replace criterion 1 with: 'the facility is relocated to, or a better facility is provided, in an equally or more accessible and appropriate building or location;'

Replace criterion 2 with: 'It can be demonstrated that the facility is no longer needed and there is no reasonable prospect of use in the future;'

Other Matters - General

- 7.79 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for EDDC and WPC

to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community. The Plan includes a range of policies and has a very clear focus on safeguarding the character of the area and safeguarding existing community facilities.
- 8.2 Following the independent examination of the Plan, I have concluded that the Woodbury Parish Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to East Devon District Council that subject to the incorporation of the modifications set out in this report that the Woodbury Parish Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved on 24 January 2014.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth way.

Andrew Ashcroft
Independent Examiner
24 February 2026