

Woodbury Parish Neighbourhood Plan

Summary of the Representations Submitted to the Independent Examination

Use of this Document

This document sets out a summary of the representations (comments) received on the Submission Version of the Neighbourhood Plan, which were passed to the independent examiner for consideration. Please note that the full wording of all representations is available on the [Woodbury Parish Neighbourhood Plan](https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans) page of the District Council website (found at: <https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans>).

The Examiner's Final Report is also available on this webpage and forms part of the documentation for the referendum. In addition, correspondence that took place during the examination and documentation for every previous stage in the development of the neighbourhood plan can be viewed.

Please note that the Submission Version of the Plan has been updated to the Referendum Version, following consideration of the Examiner's final report by East Devon District Council. The District Council Decision Notice sets out the changes agreed between the versions. The Decision Notice and the Referendum Version of the Plan are also part of the referendum documentation and available on the webpage above.

Paper copies can be supplied if strictly necessary.

Important Note

- i. This document seeks to set out a factual summary of the key points made in each representation in order to give an overview. However, to view further detail and the original wording of the representations as submitted in full, please go to the [Woodbury Parish Neighbourhood plan page](#) on our website (see under 'Submission Consultation').
- ii. Summaries have been produced with some limited assistance of Microsoft Office 'Copilot' AI tool, with manual checking and adjustment for accuracy.
- iii. Policy reference numbers cited in the representations refer to the numbering from the previous [Submission Version](#) of the Plan.

Summary of Representations (in alphabetical order)

3West Group Limited

Supports the recognition in the Plan that additional housing is needed but argues that it does not fully account for likely future development pressures. Notes that Woodbury (and nearby Lympstone) are identified in the emerging local plan as suitable for further growth, meaning land on the edges of these settlements—some within the NP area—may need to be developed. Considers that this development pressure may increase because the emerging local plan proposes to meet only part (80%) of the area's housing need initially, which could lead to an early review and further land allocations. Noting that the NP does not include site allocations, suggests that the NP should better reflect the potential for growth and consider identifying suitable development sites if it is updated. It highlights one such site (Local Plan reference 'WOOD_10'), which already has planning approval in principle for around 60 homes, as suitable for inclusion in the plan as an allocation. It also questions whether it would be more appropriate to pause the NP until the new local plan is finalised, to ensure alignment, and questions the short plan period to 2031, suggesting this should be extended.

In principle, the representation advises that the NP should not impose requirements on development that go beyond national or local plan policies, as this could affect deliverability. Concerns are raised in particular about policies relating to housing mix (Policy 1 New Housing Development), environmental impacts (**Policy 4 Assessment of Cumulative Impact**) and enhanced environmental standards (**Policy 5 Green Energy Initiatives**), which may duplicate or exceed existing requirements which is unnecessary or likely to be unjustified.

Overall, while broadly supportive of the plan's aims, the response recommends revising its timing, scope and policy approach to ensure it remains realistic and consistent with higher-level planning policies, including strategic policies in the emerging new Local Plan.

Collier Planning on behalf of 3WEST DEVELOPMENTS

Similar to above, this representation raises concerns about the timing of the neighbourhood plan preparation whilst the East Devon Local Plan is under review. Suggests that as neighbourhood plans must align with strategic policies, this creates uncertainty and suggests that consideration should be given to pausing the NP until the new local plan is adopted, to ensure it remains relevant and consistent. It also questions the short plan period to 2031, which may be less than 5 years by the time the Plan is 'made', and recommends extending it.

Welcomes the Plan's recognition that new housing is needed but highlights that it does not currently allocate sites and considers it does not fully address future development pressures. In particular, advises that the nearby settlement of Lymptone is expected to take on a greater role in accommodating growth under the emerging local plan, including a proposed allocation at Meeting Lane (GH/ED/72a), which the respondent is promoting. Argues that additional land within the NP area, especially on the edge of Lymptone, may also be suitable for development and that the neighbourhood plan should better reflect and plan for this, particularly in the context that the emerging local plan is currently proposing to meet only part (80%) of the area's housing need. Suggest this could lead to an early review and the need to identify further development land, including within the NP area.

Generally supports most of the policy objectives in the plan but raises concerns about specific policies in the neighbourhood plan, particularly:

- design requirements (**Policy 1 New Housing Developments**) based on Woodbury which may not be appropriate for development related to neighbouring Lymptone, and
- areas where the Plan appears to be setting unjustified requirements that may exceed those in national or local policy and which could affect the ability to deliver development, including policies on housing mix (**Policy 1**), environmental impacts (**Policy 4 Assessment of Cumulative Impact**) and enhanced environmental standards (**Policy 5 Green Energy Initiatives**).

Savills on behalf of 3WEST GROUP

Raises various concerns about the Plan, particularly in relation to housing provision, evidence and overall approach. Argues that the plan does not meet the required "basic conditions", particularly as it does not include a clear housing requirement or identify sites to meet housing needs up to 2031. As a result, the representation considers that the plan's strategy is flawed and would need further changes before it could proceed.

Considers a key issue to be that the neighbourhood plan relies on the emerging East Devon Local Plan to provide housing sites rather than setting out its own requirement and allocations; asserting that this approach is insufficient and not in line with national guidance. Also raises concerns about a lack of supporting evidence, including the absence of a housing needs assessment and limited information on how the plan was prepared, and associated issues of transparency.

Questions the plan period to 2031, suggesting that by the time the Plan is adopted, it may cover less than five years, which is considered too short and not clearly justified.

More generally, it suggests that the plan should take a more proactive approach to planning for future growth, including identifying suitable development sites. One site in particular—land north and east of Exton Farm, which is proposed for around 39 homes in the emerging local plan (site reference Wood_28) —is highlighted as a suitable option that should be considered for inclusion as an allocation in the neighbourhood plan.

Comments on specific policies:

Policy 1 (New Housing Development): Generally supportive in principle, particularly the focus on sustainable locations and accessibility. However, considers policy insufficient on its own without housing allocations within the plan.

Policy 4 (Assessment of Cumulative Impact): Objects on grounds of being unclear and too broad. Suggests it may place unnecessary burdens on development. Recommends either limiting the policy to transport-related impacts or removing it altogether, on the basis these type assessments are already required through the development management process.

Policy 5 (Green Energy Initiatives): Objects on the basis that it duplicates or goes beyond national standards. Argues that such requirements should be set at the local plan level, not in a neighbourhood plan, and may be unjustified.

Overall, while recognising the role of neighbourhood planning, the representation concludes that the plan needs further work—particularly to address housing provision, strengthen its evidence base and ensure its policies are clear, justified and deliverable.

Sally COLE

Supports the Plan as well thought out and comprehensive.

Devon Countryside Access Forum (DCAF)

Seeks the addition of a separate statement or objective in the Plan to highlight the importance of the recreational access opportunities in the area and the contribution of this network to health and wellbeing, preferably with the addition of a map to show routes on the Pebblebed Heaths, the Exe Estuary Trail and Public Rights of Way.

Requests wording to be added to Policy 1 New Housing Development to include additional references to recreational access similar to Policy TC4 of the emerging new Local Plan (and supported by national planning policy) to require development proposals, as appropriate, to provide or improve footpaths, bridleways or cycleways for all users, taking opportunities to extend the existing network and seeking to avoid negative impact on existing routes, unless acceptable alternatives are provided.

Also, requests amendment to paragraph 6.5 of the Plan to give greater emphasis to the health and wellbeing benefits that might arise from the new Clyst Valley Regional Park and proposed Clyst Valley Trail. To this end, proposes wording to be added as a new and distinct part of section 6.5.

Devon County Council

Comments on various themes as follows:

Highways and Transport:

- a) ***Sustainable transport and road safety*** – supports the aspiration of the plan for improved sustainable transport links as a key theme which furthers DCC objectives and delivery, and the aims for new development to be accessible by sustainable modes to key amenities. Supports the principle for traffic calming measures and active travel improvements but points out that funding is limited and currently, opportunities to leverage funding from developers is minimal. Advises what DCC envisages is being and can be delivered in this area.
- b) ***Parking*** – considers the parking ratios in Policy 6 Vehicle Parking Requirements to be high and by encouraging private car use conflict with aims on the Plan to increase use of sustainable transport modes.

Flood Risk: Supports the Plan in principle on this topic but queries the evidence underpinning some statements in the plan and recommends reference to published sources. Suggests reference to DCCs Sustainable Drainage Guide and CIRIA SuDS Manual. Seeks clarification on provision of more ponds. Suggests the community may consider communal rainwater harvesting.

Gypsy and Traveller Provision: Would welcome consideration of this in the Plan.

Economy: Supports the 3 policies in the business section of the Plan as appropriate for the local circumstance.

Historic Environment: Supportive of the plan but suggests addition of images to illustrate Woodbury's distinct character.

East Devon District Council

Broadly supports the aims and structure of the plan, finding it clearly written and easy to follow. However, suggests that many policies would benefit from clearer wording, stronger justification and more locally specific detail. It also notes that some statements appear to set requirements but are not included in policy, which may limit how effective the plan is in influencing planning decisions. Acknowledges that while the plan period to 2031 is relatively short, this is considered acceptable given the intention to review the plan early, after the new Local Plan is adopted, which is supported.

Comments on specific policies:

Policy 1 (New Housing Development): Generally supported but recommended to clarify within the policy that it only applies where development is allowed for by the Local Plan. Noted that some requirements (e.g. affordable housing, self-build) may be too strong without sufficient evidence and should be expressed more flexibly. Suggests design requirements allow more flexibility to avoid being overly prescriptive especially given the age of the cited Village Design Guidance; and that greater clarity is needed in the final clause to better define the environmental impacts and the open spaces intended to be protected.

Policy 2 (Retention of Affordable Homes): Considered supportable.

Policy 3 (Accessibility of New Development): Supported, but wording should reflect that detailed transport assessments are only needed for larger schemes. Suggests wording amend to reflect the existence of the train station at Exton.

Policy 4 (Assessment of Cumulative Impact): Concerns raised about enforceability and scope, with concerns about practical application. Suggests could be supported if clearly limited specific issues such as transport and drainage.

Policy 5 (Green Energy Initiatives): Generally supported but wording should be clearer and more precise. Suggested to add reference to low-carbon energy, alongside renewable, and that it would benefit from “green initiatives” being better defined. Suggests requirement for sustainable transport access should allow for exceptions where not practical but support could still be afforded to the proposal.

Policy 6 (Vehicle Parking Requirements): Generally supported but advises some standards may be excessive or inconsistent with emerging Local Plan policies. Some wording changes suggested to ensure it is enforceable and reasonable.

Policy 7 (Landscape Character and Enhancement): Supported in principle, but notes effectiveness likely to be limited by lack of clearly identified key views to which the policy would relate.

Policy 8 (Biodiversity Enhancement): Considers this to be partly unnecessary as biodiversity net gain is now required by law. Suggests policy be updated or simplified to reflect current legislation and to clarify that on-site / in-parish biodiversity net gain delivery may not always be possible.

Policy 9 (Support for Wildlife): Supported and considered to add value to existing Local Plan policy.

Policy 10 (Conservation of Heritage): Considers policy to part duplicate and part conflicts with national policy. Suggests alternative wording to distinguish more clearly between designated and non-designated heritage assets.

Policy 11 (Green Spaces): Suggests needs clearer definition of which spaces are covered by the policy, and notes limitations in the policy protection that can be applied through it.

Policy 12 (Small Business Development): Considered generally consistent with Local Plan policies and acceptable as drafted.

Policy 13 (Rural Diversification): Supports and notes similar to non-strategic policies in the adopted and emerging Local Plans. Suggests additional wording to ensure clearer consideration of traffic impacts and sustainability.

Policy 14 (Equine Development): Supported with various suggested wording changes to improve clarity and control.

Policy 15 (Protection of Community Facilities): Supported minor amendments to improve clarity and practical application.

In addition, the representation makes a range of suggestions for improvements to the plan, beyond policy wording, for accuracy and clarity, including minor wording changes and corrections for errors in supporting text and clarification in the wording of some Plan objectives.

Savills on behalf of FWS CARTER AND SONS (Greendale Business Park)

Supports the overall aims of the neighbourhood plan, particularly its generally positive approach to renewable energy, environmental protection and economic development. Highlights the role of Greendale Business Park (GBP) as a major local employment site and advises that current proposals for expansion respond to market demand from small and medium sized businesses and have been planned with environmental considerations in mind, including renewable energy use, landscape mitigation and biodiversity enhancements. On this basis, supports Policy 5 Green Energy Initiatives and policies 7-9 relating to environment, landscape and biodiversity.

The main concern raised is a potential conflict between the NP's stated support for local economic growth and a restriction on the expansion of existing business parks through part one of Policy 12 Small Business Development. Specifically:

Policy 12 (Small Business Development): Objects to the first part of the policy, specifically the restriction (described as a 'moratorium') on expansion of existing business parks beyond their current boundaries. Argues there is no clear evidence to justify this restriction and considers it to be inconsistent with the plan's wider support for economic growth, and that the plan should also allow for sustainable

growth of key employment sites, especially for SME business and where this can be achieved in line with environmental objectives. Concerned the policy as drafted could limit opportunities for local businesses to expand. Recommends deleting the restriction (by removing part 12.1 from the policy) and instead supporting sustainable expansion where it meets environmental and other policy requirements.

Nigel HUMPHREY

Comments in respect of paragraphs in section 3 Transport Infrastructure in respect of concerns over traffic impact from developments in Exmouth, particularly site reference Exmo_20 proposed through the emerging East Devon Local Plan, and seeks full awareness of this through the neighbourhood plan.

Historic England

Advises there are no comments on the Plan.

Sean KENNELLY

Comments in respect of Policy 1 New Housing Development that whilst he has no objection to new houses, water treatment issues and capacity at the water treatment facility must be addressed first to avoid environmental impacts from overflow on local residents and wildlife.

LRM Planning on behalf of Richard House

Policy 4 (Assessment of Cumulative Impact): Objects to this policy on the basis it is unclear, overly restrictive and not supported by sufficient evidence. Considers that the policy places too much emphasis on environmental impacts and is contrary to the balanced and

flexible approach to sustainable development set out in national planning policy. Also considers it to be inconsistent and contrary with the East Devon Local Plan (adopted LP policies EN5 and strategy 46), which already require environmental impacts to be assessed and mitigated, and that it introduces unnecessary additional requirements. The proposed threshold of 10 dwellings is considered too low and inconsistent with national Environmental Impact Assessment regulations and the adopted Local Plan policies. The representation further argues that the policy lacks clarity, with no guidance on how cumulative impacts should be assessed, and that there is no clear evidence to justify its inclusion. Considers therefore that the policy does not meet the required 'basic conditions' and should be deleted.

Policy 5 (Green Energy Initiatives): Objects on the basis this policy is unclear, not supported by sufficient evidence, and goes beyond what is appropriate for a neighbourhood plan. Suggests that requirements relating to carbon reduction and energy standards should be dealt with through the local plan and building regulations, rather than at neighbourhood level, with the main concern being that the policy seeks to achieve carbon-neutral development and promote higher environmental standards without clear justification and viability testing. Considers the policy to be inconsistent with the national policy and legislative position and the adopted East Devon Local Plan (Strategy 38 and 39), which requires compliance with national standards but does not require carbon neutrality. Additionally, the policy is seen as vague, with limited explanation of what "green initiatives" involve or how the policy should be applied in practice. Overall, it concludes that the policy lacks clarity, evidence and justification, does not meet the required 'basic conditions', and should therefore be deleted.

Ministry of Defence (MoD)

Comments in relation to where development could affect safeguarded military sites, in this case because the Woodbury Neighbourhood Plan area falls within safeguarding zones for Commando Training Centre Royal Marines (CTCRM) Lympstone. Advises this means certain types of development—particularly those involving height, design, or sensitive land uses—may be restricted to avoid harming operational capability, safety, or infrastructure. Emphasises the need for the neighbourhood plan to clearly reflect these constraints, ensure developers are aware of consultation requirements, and recommends inclusion of policy wording to make clear that only those applications for development which would not compromise operations of MOD sites/assets would be supported.

National Highways

Considers that the Plan is unlikely to have a significant impact on the strategic road network which NH is responsible for in the area (M5 junction 30 and the A30). Generally welcomes policies that will improve sustainable transport networks and safeguard and improve community facilities, to reduce the need to travel/to travel by private car.

Natural England

Advises there are no specific comments on the plan. Provides a range of advice and sources of further information in respect of its remit and the preparation of a neighbourhood plan, in general terms.

NHS Devon Integrated Care Board (ICB)

Advises that the Woodbury GP surgery is operating at over the capacity of the site and comments on this in terms of the implications of any further development sites being allocated within the district's Local Plan. Suggests inclusion of a section within the neighbourhood plan referring to this issue and stating that any further developments within the surgery catchment need to be accompanied by appropriate developer mitigation to increase surgery capacity.

Kenneth PERRY

Supports the Plan as submitted.

Thomas SHILLITOE

Comments in respect of paragraph 3.8 of the plan regarding the impact of traffic from major housing developments in Exmouth (existing and proposed under the emerging new Local Plan (site ref Exmo_20), that there should be significant concern in Woodbury about this. Representation encourages representations on this matter to be made to East Devon District Council.

South West Water

Supports the Plan in promoting the principle of rainwater harvesting, and would further support the adoption of formal policy wording to aid water efficiency measures and protect against surface water issues. Comments in more detail on these themes as follows:

Water Efficiency: Due to high water consumption rates in the southwest, would support the addition of policy clauses to require enhanced water efficiency measures in development such as relating to water consumption rates for new development and rainwater harvesting measures.

Sustainable Urban Drainage Systems (SUDS): (*erroneously refers to a Policy BE1 regarding SUDS which is not included within the Woodbury Plan*) Discusses the impacts of climate change on soil and supports the use of natural drainage measures, which it advises have a range of benefits for the environment and the infrastructure SWW is responsible for. Suggests the addition of a policy to require developers to incorporate rainwater harvesting and to follow the national planning guidance Surface water disposal hierarchy.

Infrastructure Provision: Would support the inclusion of policy wording imposing a policy requirement for all proposals to demonstrate how infrastructure needs are addressed, and where such infrastructure capacity is not available within SWWs network, that a package sewage treatment plant can be considered.

Drinking Water Assets and Wastewater Assets: Advises that SWW is carrying out upgrades to the drinking water and wastewater networks to enable and provide capacity for the current on-going new housing in the Woodbury area in 2026 and that further new housing would require further assessment and may require additional upgrades which would be funded through the Infrastructure Charge SWW would receive from developers.

Sport England

In their role as a statutory consultee on planning matters, comments in general terms only, with no specific comments on plan text or policies.

Emphasises that the neighbourhood plan must align with national planning policy (NPPF) by supporting healthy, active communities through the provision, protection, and enhancement of sports facilities, and by integrating these with new development. Highlights the

importance of using robust local evidence (such as playing pitch strategies), planning for increased demand from housing growth, and applying design principles—such as Sport England’s Active Design guidance—to ensure developments promote physical activity and wellbeing.

David WHITTON

Considers section 8 of the plan relating to Community Facilities is too passive. Suggests Policy 15 Protecting Community Facilities should include a further clause to require that all new development makes a financial contribution the maintenance, improvement and / or replacement of community amenities, including village halls, to mitigate the pressure that further development will place on existing and aging facilities.