

Woodbury Neighbourhood Plan – Submission Version

(Dated September 2025)

Plan vision:

“ensure our Parish develops in a way that is sustainable economically, socially and environmentally, and that all our parishioners enjoy living here and can share a strong sense of community.”

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HOUSING DEVELOPMENT	<i>Objectives:</i> - to meet local housing needs by providing houses of appropriate size, location and cost; - to achieve a balance between sustainable development called for by planning policy and local need; - to protect and enhance the character and features of the Parish.	We would welcome reference in the objectives to good design and local distinctiveness. Suggest the 2nd bullet would more appropriately read, “...between housing development called for by district housing requirement and meeting local needs;”
Policy 1 New Housing Developments	P1.1 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 LiveWest Housing Association 2022). P1.2 High design quality should conform to the local character as set out in the Woodbury Design Guidance document (Appendix C) (to be reviewed when the current NP is updated) and the principle stated in objective 2.8. P1.3 Development must be in sustainable and accessible locations and will have access to regular and reliable public transport, existing footpaths and cycleways enabling reduced dependency or car use whilst also recognising the importance of disabled access. P1.4 Future developments should avoid adverse direct environmental impacts and where not possible must demonstrate that they will mitigate against any adverse environmental effect on the Parish and protect local open spaces which are currently actively enjoyed or used by residents. [Objective 2.8 of the Plan states - The following general principles will apply to developments, that they: will be in keeping with the local surrounding area by being of an appropriate scale, mass, height, size, layout and density, also through	For the avoidance of doubt that the plan does not seek to support housing development beyond that which would be permitted under strategic policy, suggest introductory wording added to state, ‘Where allowed for under East Devon local plan policy, proposals for housing will be supported where.’ and adjusting the syntax of subsequent clauses to flow from this. P1.1 - As a scheme for multiple dwellings could be for as few as 2 or 3 homes, this is below the threshold in higher tier policy where affordable or self-build can be required, with no evidence to support a lower threshold in this neighbourhood area. Self-build as part of an affordable element is also often unachievable. For these reasons, we cannot support ‘must’ and suggest instead the policy needs to be one of encouragement. Perhaps, “In accordance with thresholds set by Local Plan policy, housing development proposals for multiple dwellings must provide a mix of sizes and types that reflects identified local needs as indicated by the latest Housing Needs Survey, with opportunities for self-build and affordable housing for social rent particularly encouraged.” At Regulation 14 stage, we asked for evidence and so the citing of the current HNS is a useful and valid reference. EDDC has confirmed with DCT that this study is now in the public domain and available for use by the NP group to support the NP. For longevity we suggest however that the reference to it be moved to supporting text and note the date should be corrected to 2023 and retitled “Parish of Woodbury Housing Needs Report, DCT on behalf of Live West Homes”. P1.2 - Noted and support the intention to review the design guidance, but this intention to review is not appropriate to be stated within the policy itself and should be removed. Notwithstanding the design guidance already carries weight as it is adopted by EDDC as SPG, due to the age of the guidance (2002) and

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	- the use of appropriate materials and recognising the importance that windows, roofs, detailing, the colour palette and use of traditional materials and techniques make to local distinctiveness - will not adversely impact on the amenity of neighbouring properties; - include landscaping which compliments and enhances the character and ecology of the area - avoid any negative impact on views into and out of settlements, heathland and the coast - encourage the re-instatement of architectural detail - provide a balance of properties appropriate for the age profile and housing need of the Parish population - be designed to facilitate integration into the existing community and provide safe pedestrian access to village amenities - provide for the storage of recycling and waste containers - should include green initiatives, such as solar panels, heat pumps, rainwater harvesting, etc. - include electric car charging points in accessible positions for all new dwellings - state, in the case of significant development, how the provision for and development of social, education and health facilities will be achieved in anticipation of changes to the local population resulting from the development]	concerns raised by our Development Management planners that some aspects are considered dated/overly prescriptive, we would suggest 'have regard to' rather than 'conform' would be more appropriate to allow greater flexibility. Also suggest Appendix C should include a link to where the full document can be viewed: woodbury-village-design-statement.pdf. We suggest better and clearer wording for the clause would be, "New developments shall be designed to be high quality, having regard to the local character as set out...." Also, correct 'principle' to 'principles'. P1.3 - Replace 'and will' with 'with'; suggest 'footways, footpaths and cycleways connecting to local services', and make correction to read 'dependency on car use'. P1.4 - As noted at Regulation 14, this clause is very general and lacks clarity especially in relation to which open spaces it may apply to, which is likely to affect its effectiveness in implementation without great definition: - Suggest EDDC supplies a map based on our GIS layer from the 2014 Open Space Study records for 'recreation areas, allotments and accessible open space' in the absence of local site identification that could be included to support this policy and also Policy 11. - Suggest 'enjoyed or used' is replaced with more precise wording, such as 'in current formal or informal recreational, amenity or other community use' - Also, delete 'future' as superfluous given all development proposals to which policies in the plan relate will be 'future development'. Objective 2.3 – suggest amending bullets 4-7 as follows to read: - include appropriate planting which compliments and enhances the landscape character and ecology of the area - avoid any negative impact on important views into and out of settlements, heathland and the coast - encourage the re-instatement of locally distinctive architectural detail - provide a range of properties appropriate for the age profile and housing need of the Parish population. - Also, clarify the definition of 'significant development' for the final bullet to be consistently applied.
Policy 2 Retention of Affordable Homes	P2.1 New dwellings originally built and intended to be used as affordable housing must be made available in way that they can be retained as affordable housing.	Notwithstanding as observed at Regulation 14 that some types are specifically designed as a route to home ownership, this is considered acceptable.
TRANSPORT INFRASTRUCTURE	<i>Objectives:</i> to make improvements to the infrastructure of Woodbury and roads throughout the Parish to mitigate pressures arising from residential development both within and adjacent to the Parish. This should include	As noted at Regulation 14 in reference to the last bullet, advance delivery of infrastructure is clearly desirable but not necessarily achievable due to the economics. Suggest ' wherever possible ' is inserted for clarity.

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	consideration of highway capacity, train services, bus services and other modes of transport. - to establish safe pedestrian and cycle routes between and within the three settlements in the Parish - to improve how the villages are connected through active transport infrastructure (shared cycleways that are inclusively designed to allow for all users (e.g. e-bikes, trikes, mobility scooters etc) and connect to the Exe Estuary National Cycle Routes - to establish safe links between public transport routes for commuters, leisure activities and tourists. - to ensure that the infrastructure within the Parish is safe for all users and that any upgrading and improvement is carried out in a timely manner in advance of any future development.	
Policy 3 Accessibility of New Development	P3.1 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. P3.2 Any new housing developments must provide pedestrian access to link up with existing or proposed footpaths, ensuring that the public can walk safely to bus stops, schools and other village facilities including providing safety measures to enable the safe crossing of roads.	Links well with adopted Local Plan non-strategic Policy TC2 Accessibility of New Development. P3.1 - As previously advised, a TA will not always be required although accessibility is a wider consideration, therefore suggest this be amended to say, “Proposals for new housing development must 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”. P3.2 - In view of the proposal under the new Local Plan to introduce a settlement boundary for Exton which does not have a school, but has a train station, suggest this could be more generally worded to state 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.”
Policy 4 Assessment of Cumulative Impact	P4.1 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. Developments that are assessed as having a net negative impact will not normally be supported, unless suitable mitigation or overriding public benefit can be demonstrated.	We understand the motivation to include this policy within the plan. However, as advised at Regulation 14 stage, we have concerns about enforceability, as well as scope. We do not consider we can require this as worded for proposals unless development is captured by the EIA regulations where an assessment of cumulative impacts is required. A cumulative assessment for some factors, such as landscape impact, is also often difficult to quantify and assess, as well as to determine which development tips the balance. However, given the explanatory text and the inclusion of the policy in the transport chapter, if this policy is specifically aimed at consideration of cumulative impacts on transport and drainage, and this was made explicit in the policy wording, we could support.
UTILITY INFRASTRUCTURE / CLIMATE CHANGE MITIGATION	<i>Objectives:</i> to encourage new and replacement cables to be buried wherever possible.	Whilst not policy, we would suggest caveat the support in bullet 3 to read, “...incorporate appropriate renewable energy generation...” and bullet 4, “to

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	- to encourage new and improved utility infrastructure in order to meet the identified needs of the community, but such infrastructure must provide appropriate mitigation that demonstrates no detriment to the local environment and to the amenity of those residing within the Parish. - any new developments should be designed to incorporate renewable energy generation. - to decarbonise the local energy supply: renewable energy generation will be supported particularly where helping to conserve or enhance biodiversity. - to ensure that new development aims to be carbon neutral, through design, construction and performance. - to encourage green initiatives in new and existing development such as rainwater harvesting, vehicle electric charging points, energy efficiency improvements and measures to enhance biodiversity. - to ensure accessibility to sustainable transport and community facilities to reduce the need for cars, for example link cycle and pedestrian routes to the school.	decarbonise the local energy supply sensitively sited and designed renewable energy generation will be supported..."
Policy 5 Green Energy Initiatives	P5.1 New power generation will be supported when generated from renewable sources. Support will also be given to associated energy storage. These facilities must be designed and sited to avoid adverse landscape, visual and environmental impact. P5.2 Green initiatives will be encouraged in all new developments. P5.3 Any new development must be accessible to sustainable transport.	P5.1 - Note the revision/extension to this policy which previously stated, 'new power generation will only be supported where renewable energy will be used', in response to various comments received at Reg 14 consultation. With reference to the plan text and phrasing in the Local Plan, suggest the first part is amended to read 'from renewable and low carbon sources.', and that that the second part could be strengthened by clarifying that "Support will also be given to energy storage where this is part of a renewable energy scheme". In the last part, given the assets in this neighbourhood area, suggest that 'heritage' be added to the list of impacts to be addressed. P5.2 - As advised at Regulation 14 stage, whilst the intent is understood and the supporting text provides examples, 'green initiatives' is a very general term, and the policy is therefore open to interpretation. Suggest with reference to the plan text extending the clause to say, "including but not limited to those referred to in paragraph 4.9." P5.3 – Notwithstanding officers did not comment on this part of the policy at Regulation 14 stage, given the rural nature of the parish, this may not be reasonable as an absolute requirement. Exceptions may be appropriate, for example, for barn conversions, agricultural development. Therefore, suggest this may be appropriate to reflect in the policy, perhaps to say, "Unless there are clear operational or wider sustainability reasons why this is not possible or practicable, development should be sited to maximise opportunities for access by sustainable modes of transport".

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VEHICLE PARKING WITHIN THE PARISH	<i>Objectives:</i> - to employ local measures as necessary to manage the parking problem within villages. - to ensure that future developments have adequate parking provision.	
Policy 6 Vehicle Parking Requirements	P6.1 All planning applications resulting in a new or enlarged dwelling must meet the following criteria: - Off-street parking must be provided at least in the ratio of one parking space for a one-bedroom home, two car parking spaces for two and three bedroom homes and three parking spaces for four and more bedroom homes. - In the case of Houses with Multiple Occupation, the ratio must be one off-street parking space per bedroom. - Proposals must not result in the loss of off-street car parking spaces for existing dwellings unless it can be demonstrated that there is a surplus of existing off-street spaces serving said dwellings. - Access for all utility and emergency vehicles must be ensured. - Cycle storage must be provided.	This is a common policy area in NPs in East Devon. It can be applied alongside adopted Local Plan policy TC9, however it should be noted that the parking ratio does not align to the emerging new Local Plan policy (Policy TR04, Regulation 19) which proposes use of 1.7 car parking spaces per dwelling (rounded). Whilst not a strategic policy it may supersede the NP policy and be one trigger for an early review. Noted improvements in the policy since Regulation 14 stage further to informal officer advice, however, we would reiterate concerns that the parking requirement in clause 2 is considered excessive for larger houses and unlikely to be achieved if the application is for a change of use. In addition, we would request that clause 3 be reframed as we would only have grounds to object if it was going to lead to on-street parking that was dangerous; it is not about capacity. Suggest, "Proposals must 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 highways safety".
ENVIRONMENT	<i>Objectives:</i> <i>Landscape and Biodiversity:</i> - to retain and enhance the distinctive environment and character of the Parish by ensuring that environmental and historical features of local importance are retained, are sensitively managed and where possible enhanced, especially in the context of any development proposals. - to protect, manage sensitively and enhance aspects of the local environment that are either significant in themselves or are valued by the local community or by visitors and in particular woodland, grassland, Devon Banks, sunken lanes, hedgerows and water bodies rich in fauna and flora. - to minimise development impact on the natural environment and show net gains for biodiversity. - to minimise development impact upon valued views and areas of landscape that may be defined in terms of their visual significance. - proposals for new development should seek to conserve and enhance local landscape character <i>Historic Built Environment:</i> - To preserve and enhance locally recognised key features including: - historic or noteworthy buildings not on the National Heritage List for England - unscheduled but important buried remains / sites of local significance	

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	○ amenity areas, structures ○ the Woodbury Conservation Area and areas worthy of conservation such as the centre of Woodbury Salterton. <i>Open and Community Spaces:</i> • To renew wherever agreement is possible, lease arrangements for open and community spaces with a long term aim to acquire these for the community via agreement between the Parish Council and landowners • To ensure that new development respects, retains and where possible enhances public and communally used open and green spaces, including village greens, recreation and sports grounds, allotments, and common land. <i>Flooding</i> • to address consistent flooding concerns and their associated problems. • to encourage landowners to address land management issues contributing to flooding incidents. • to ensure all new hard standing and parking areas have permeable surfaces. • to encourage the County highway authority to maintain and improve kerbside drainage. • to secure agreement and action by the relevant County and national agencies to alleviate the risk of, and actual flooding of Exton.	Note there is no corresponding policy related to the flooding objectives. Notwithstanding this is an area where it is difficult for policy to add to the legislative and strategic planning approach, which is highly prescriptive, as suggested at Regulation 14 stage, the aspiration for parking areas to have permeable surfaces could be the subject of policy in the plan.
Policy 7 Landscape Character and Enhancement	P7.1 Proposals for development must detail how existing trees, Devon banks and hedges within or adjacent to the development site will be protected or enhanced. New planting of trees, Devon banks and hedges are encouraged to increase tree cover and hedgerows within the Parish. 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. P7.2 Local views from viewing points such as the top of Globe Hill and entries to the settlements as well as views of the Churches need to be safeguarded. Views out of the Plan Area must also be protected.	P7.1 - No comments, other than to note that the policy does not extend to replacement planting, but Local Plan policy (adopted and emerging) does cover this aspect so will apply. P7.2 – Noted that the option to identify key views has not been taken which will limit the effectiveness of this policy and could be addressed through an early review, aligned to emerging Local Plan Policy OL04 (Reg 19 stage) which specifically refers to conserving and enhancing views identified in neighbourhood plans. Noted the addition of the 2nd part of clause 7.2 since Reg 14 stage, in response to EDDC officer suggestion to consider impact on long distance views. For clarity, as the NP policies will not apply to development proposals outside the plan area and not all views can necessarily be protected, suggest this be replaced with wording to the effect, “The potential impact of development on long distance views (as well as local views and village settings) should also be considered.”
Policy 8 Biodiversity Enhancement	P8.1 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.	P8.1 – biodiversity net gain requirements are now enshrined in law and therefore the second part of this policy is now considered superfluous and should be deleted or if retained, revised for clarity that this (presumably) is not intending to override exemptions and to better define a ‘recognised biodiversity metric’ and

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	P8.2 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.	makes provision for subsequent revisions. With reference to emerging Local Plan Policy PB05 (Biodiversity Net Gain) (Reg 19 stage), suggest, "Unless exempt, development requiring a planning application must demonstrate the delivery of biodiversity new gain with the use of the most up-to-date statutory metric". P8.2 – Note this allows for emerging new Local Plan Policy PB05 which is seeking to require a 20% net gain. However, to be reasonable, the policy can only go so far as to express a preference for on-site/in parish as this may not always be achievable. Also to note that the Parish may be able to assist in identifying potential opportunities for biodiversity net gain delivery in the parish/plan area to maximise the potential for within parish mitigation.
Policy 9 Support for Wildlife within New Developments	P9.1 Development will be expected to make provision for wildlife to: 1. Include an average rate of one integral swift brick per unit/residential dwelling, more for larger buildings 2. Include bat boxes and barn owl boxes, especially where existing buildings are to be demolished as part of a scheme 3. Protect or establish permeable and ideally planted boundaries, e.g. hedges, or fences with small gaps at the base in each garden, that permit movement of hedgehogs; 4. Include solitary bee boxes, bee bricks and insect houses; 5. Retain existing and plant new native trees, shrubs and hedges to create green corridors for wildlife to move through the development to adjacent habitats. 6. All new provisions to be appropriately located on or adjacent to the site.	Welcome this policy and the amendments made to the policy in response to our comments at Reg 14 stage. Consider it adds to current local plan policy.
Policy 10 Conservation of Heritage	P10.1 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 with particular regard to their local distinctiveness, character and sense of place.	As advised at Regulation 14 stage, 'without identifying specific non-designated heritage assets this is a general policy with largely duplicates national policy requirements. Whilst similar policies appear in other NPs, there would appear to be conflict with the NPPF which allows for the public benefit of the proposals to be weighed in the balance when there is harm.' We would suggest separating out the requirements for non-designated assets from the designated ones as they are different with an amendment to read, "Development proposals affecting any designated heritage assets in the Parish, and their settings, must conserve and where possible enhance their historic significance and importance. In the case of non-designated heritage assets significant regard should be had to conserving their local distinctiveness, character and sense of place". We would also flag that our planned Woodbury Conservation Area review and the identification in the neighbourhood plan of the centre of Woodbury Salterton as containing a cluster of listed buildings, could present opportunities for the Parish

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		Council to work with EDDC in identifying non-designated heritage assets in the parish for local listing.
Policy 11 Green Spaces	P11.1 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. P11.2 Where existing community spaces are no longer utilised for their earlier purpose, alternative community uses will be looked upon favourably.	P11.1 – Noted that the option to identify and designate areas as formal Local Green Space has not been pursued. This is optional, and we would encourage it through Plan review, but we would still maintain our previous comments that the spaces to which this policy is intended to apply would need to be identified or a clear definition of ‘green and community spaces’ included. At this stage, suggest the wording from the objective in the supporting text is borrowed, to refer to ‘public and communally used open and green spaces including village greens, recreation and sports grounds, and allotments’ (omitting common land) and we can offer to prepare a map for insertion into the plan. It should be noted that it will not be possible without evidence to protect open space on the fringes of development as indicated in plan paragraph 6.13, however outside built up area /settlement boundary(s) and allocations to be meet district housing requirement set by the Local Plan, the open space around and between settlements will be classed as open countryside where development is restricted. P11.2 - Unclear if the second clause applies to green spaces solely or may overlap with Policy 15.
BUSINESS	<i>Objectives:</i> - To encourage employment opportunities for residents within the Parish and thereby also reduce traffic flow into the Parish. - To encourage the provision of employment generating space for small businesses. - To avoid significant commercial developments in the open countryside and limit existing business parks to within the published Employment Areas.	
Policy 12 Small Business Development	P12.1 Other than where 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. P12.2 Small extensions to the buildings of existing businesses or the sympathetic conversion of existing buildings will be supported where all the following are all met: - the proposal does not compromise any other policies in this Plan and the Local Plan; and - the premises is within an accessible location with no significant increase in vehicle movement; and	As observed at Reg 14 stage, this policy is broadly in line with our adopted non-strategic Local Plan policy (E7). We currently allow some expansion where sites are at capacity, but this would comply with the NP policy, as it's ‘allowed for’ by LP policy. Similar can be said in relation to the more prescriptive draft policy in the emerging Local Plan (Reg 19 stage) (Policy SE02 Employment Development in the Countryside) due to the references to the Local Plan.

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	3. it would not adversely harm the amenities of adjoining or nearby occupiers.	
Policy 13 Rural Diversification	P13.1 The 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 and where any development: 1. would not have a significant adverse impact on the surrounding landscape or environment. 2. would not adversely harm the amenities of adjoining or nearby residential occupiers. 3. where the building in question can be converted to a standard that meets the design guidelines set out in Appendix C. [Appendix C: Design guidelines from the Village Design Statement which supports National Design Guide and the National Model Design Code. – see plan page 28-29]	This policy is not dissimilar to policy in the adopted Local Plan (E4 Rural diversification and D8 Re-use of Rural Buildings), and a proposed more prescriptive policy framework in the emerging new Local Plan (Farm Diversification (Policy 53) and Employment Development in the Countryside (Policy 52)), but these are not strategic policies, and referring to the types of uses that would be supported locally and local design guidelines adds a degree of local specificity (notwithstanding comments against Policy 1 re. the appropriateness of the design guide). Whilst the NPPF acknowledges some development to sustain the rural economy may be appropriate in locations not well served by public transport and the plan will be read as whole and strongly encourages development in sustainable and accessible locations, suggest it would be appropriate to add a clause that any development ‘does not have an unacceptable impact on local roads and exploits any opportunities to make its location more sustainable’. Given the wishes of the community set out in paragraph 7.7 in the supporting text, suggest the policy should include a similar clause to that in Policy 12 P12.2 to say where any development would not lead to a significant increase in vehicle movements or extend bullet 1 of Policy 13 to say ‘...landscape, environment and the local highway network.’
Policy 14 Equine Activities	P14.1 Equestrian development will be supported if it: 1. is of a scale and/or an intensity of equestrianism use which will be compatible with the landscape and its special qualities. As a guide, 0.5 ha of grazing per animal should be provided; demonstrates sensitive design which responds to local character and distinctiveness including location and siting. 2. has a location which relates to existing infrastructure, where necessary, which includes vehicular and field access. In isolated locations field shelters may be erected but should be established adjacent to existing vegetation. Where this is insufficient to screen the building, native planting should be provided. 3. re-uses existing buildings where ever practicable and viable. Covered ménages or arenas should utilise existing agricultural buildings. 4. locates new buildings, stables, yard areas and facilities adjacent to existing buildings provided they respect the amenities of surrounding properties and uses. They should be established as a block, near to existing dwelling or farm building from which they will be managed, to improve security, reduced visual impact and minimise the footprint.	We would reiterate several points that were made at Reg 14 stage that would aid clarity and control: • Clause 2 - removal of reference to isolated locations, to simply clarify the requirement as “Field shelters should be erected adjacent to existing vegetation”. • Clause 3 – clarify in the wording that this refers only to buildings ‘on a farm or holding’. • Clause 5 - suggest remove ‘hard landscape features off from point 5 to read, ‘provides new or supplementary native planting, and boundary treatments consistent with local character, where appropriate’.

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	5. provides new or supplementary native planting, hard landscape features of boundary treatments consistent with local character, where appropriate.	
COMMUNITY, LEISURE AND WELL-BEING	<i>Objectives</i> The design for the new amenity should seek to accommodate Pre-School, indoor school sports, a growing number of village groups and societies, and continue to serve more easily as a performance and exhibition venue, with additional space for smaller meetings, improved catering and public toilets, necessary car parking space and access and facilities for the disabled.	As previously noted, this objective appears to need revision/updating or explanation, as the plan no longer includes policy regarding a new facility, and as it stands Policy 15 does not extend to support for new facilities - only against loss of existing ones.
Policy 15 Protection of Community Facilities	P15.1 Planning permission which will result in the loss of a facility will only be supported where one of the following criteria is met: - the facility is relocated to, or a better facility is provided in, an equally or more accessible and more appropriate building or location; or - the community or Parish Council is satisfied after consultation that the facility is no longer needed and there is no reasonable prospect of use in the future; or - a satisfactory assessment has taken place which proves there is an excess of such provision and the site or building is not needed for any other community facility or use.	Similar, but adds some further considerations, to policy in the adopted Local Plan (Policy RC6) and the emerging Local Plan (Reg 19) (Policy CS02). Suggest the following amends to aid clarity and implementation: - Criteria 1 - Delete the 2nd 'more' as not reasonable to insist the relocation can only be to somewhere MORE appropriate than the current arrangement. - Criteria 2 – for effective implementation it should be clearer how it would be envisaged to be demonstrated that the community is satisfied? Perhaps reframe as, 'the Parish Council is satisfied after consultation with the local community that the facility is no longer.....' - Criteria 3 – 'demonstrates' rather than 'proves' may be more accurate/reasonable.