

NORTHAM NEIGHBOURHOOD PLAN 2024-2031



CONSULTATION STATEMENT





Consultation Statement

1 Introduction

1.1 This Consultation Statement has been produced in respect of Northam Town Council's proposed neighbourhood development plan, to meet the legal obligations defined in Regulations 14 and 15 of the General Neighbourhood Planning Regulations 2012. In accordance with section 15(2) of the Regulations this Consultation statement:

- Contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan.
- Explains how they were consulted.
- Summarises the main issues and concerns raised by the persons consulted.
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

1.2 The Northam Neighbourhood Development Plan (hereinafter Northam Neighbourhood Plan) has been prepared in response to the Localism Act 2011, which gives town councils and other relevant bodies, new powers to prepare statutory neighbourhood plans to help guide development in their local areas. The Northam Neighbourhood Area received its designation notice from Torrington District Council on 7th August 2017. The application from the Town Council, the notice and its map are in Appendix 1 of the Basic Conditions Statement.

1.3 Northam Town Council has been explicit in its aim that the Northam Neighbourhood Plan should be a plan for the Parish developed by the people of Northam Parish. Every

effort was made to involve the whole community in a meaningful way at each stage of the Plan's preparation.

- 1.4 Accordingly, the community's desire to prepare a neighbourhood plan was identified in public meetings in Appledore (March 2017) and Northam (July 2017). Subsequently, a further public meeting in August 2017 established the Northam Neighbourhood Plan Steering Group. The first meeting of the Steering Group took place on 4 September 2017.

- 1.5 The Northam Neighbourhood Plan Steering Group (subsequently known as the Northam Neighbourhood Plan Advisory group and presently reporting to the Northam Town Council Planning and Development Committee) drafted the Plan on behalf of Northam Town Council. The Group consisted of councillors and members of the public representing the three main settlements of Northam Parish: Northam, Appledore and Westward Ho!



**NORTHAM TOWN
COUNCIL**

**NEIGHBOURHOOD
PLAN PUBLIC
MEETING**

MONDAY 3RD JULY 2017, 7PM

**TOWN HALL, WINDMILL LANE
NORTHAM**

Poster for July 2017 Neighbourhood Plan meeting

- 1.6** The Group has benefitted from the expertise of those with special interest and expertise in planning, the natural environment, education, housing, economic development and transport. Progress in developing the Plan was reported monthly to Northam Town Council as a standing agenda item.

- 1.7** Particular emphasis was placed on early community engagement to engage a wide range of local people and interested parties, before any proposals were formulated. This raised awareness of the proposed preparation of the Plan and ensured that their views and priorities could influence development from the outset.

1.8 The entire process of community engagement has been guided throughout by the Northam Neighbourhood Plan Community Engagement Strategy. All consultation activities have been recorded in the Northam Neighbourhood Plan Record of Community Engagement. Both documents are in the evidence base of the Plan. Copies of the questionnaires used for community engagement are in Appendix 1 of this document (page 25).

2 Summary of initial community engagement

2.1 Who was consulted?

The initial phase of community engagement included every household in the Parish of Northam and involved community engagement meetings and an initial engagement survey. In terms of engagement the purpose of this first stage of consultation was to engage as broad a range of people from the local community as possible right at the start of the planning process. The aim of the consultation was to identify issues and concerns of importance to the community.

2.2 How were they consulted?

By March 2018 an initial questionnaire had been delivered to every household in the Parish of Northam. An additional distribution targeted younger people, because it was considered that older people were over-represented in the responses from the first distribution.

2.3 Each questionnaire asked consultees to identify the most important aspects of life in the Parish, the things they most valued about living in the Parish and their concerns about living in the Parish.

2.4 What did the consultees say?

The leading conclusions from this process are summarised below, with each list being ordered from the most to the least frequently mentioned subject.

2.5 In both distributions the aspects rated as most important by most consultees were:

- Health care facilities
- Green spaces and heritage
- Transport

2.6 According to the consultees (from both questionnaire distributions) the main things they valued about living in the Parish of Northam were:

- Quality of environment
- Community and village life
- Safety

2.7 According to the consultees their main concerns about living in the Parish were:

- Development
- Traffic
- Parking problems

2.8 How were the issues and concerns responded to?

The Steering Group fully identified and discussed the important aspects, concerns and valued qualities of life in the Parish raised in this early intensive phase of community engagement. From this data and discussion a draft vision for the Parish of Northam was developed.

Four themes were identified for the Plan: community; housing; the environment and heritage; business and employment. Objectives related to each theme were identified and three focus groups were set up in order to draft policies to deliver these objectives.

The three focus groups were:

- Housing and Development led by Cllr. Chris Leather
- Green Spaces and Heritage led by Cllr. Peter Hames
- Tourism, Business and Employment led by Cllr. Nick Laws

The membership of each focus group was drawn from the Steering Group members and volunteer members of the public.

2.9 In the process of policy-making, numerous policies were drafted and some were discarded or substantially amended following consultation. Many policies were re-named and all policies were given new reference numbers. In this document, for the avoidance of doubt, all policies are referenced by their present names and reference numbers. Previous reference numbers are given in parentheses.

2.10 The neighbourhood plan process gives the option of allocating sites in the plan area for housing development. The Steering Group considered that to ensure transparency in the process a ‘call for sites’ would be beneficial. Northam Town Council made the ‘call for sites’ between 16th and 30th August 2018 and advertised in the *North Devon Gazette* and on the Northam Town Council and Northam Neighbourhood Plan websites.

2.11 The Town Council received six proposals for possible sites for development in the parish of Northam and the Steering Group carefully considered each site in turn in terms of site attributes and the Local Plan Strategic Housing Land Availability Assessment (SHLAA). The outcomes are set out in Table 1 below:

Site	Outcome/Reason	Notes
1 Seabright Cottage, Diddywell Road, Northam	DISCOUNTED Site did not conform to Local Plan strategic policy on highways.	Assessment concurs with SHLAA Assessment Proforma, reference SHA/NOR/4.
2 Knapp House, Churchill Way, Northam	DISCOUNTED Site poorly related to settlement development boundaries; site does not conform to Local Plan strategic policies on coalescence and undeveloped coast.	Assessment concurs with SHLAA Assessment Proforma, reference SHA/NOR/100.
3 Land at Bloody Corner, Churchill Way, Northam	DISCOUNTED Site outside settlement development boundary; site does not conform to Local Plan strategic policy on undeveloped coast.	In 2021 Torridge District Council refused a proposal for housing on this land on these grounds. This decision was upheld on appeal (reference APP/W1145/W/21/3283161).
4 <u>Green Pastures, Lenwood</u>	DISCOUNTED	Assessment concurs with

<u>Road, Northam</u>	Site in open countryside and isolated from existing settlements; site does not conform to Local Plan spatial strategy for rural area.	SHLAA Assessment Proforma, reference SHA/NOR/33.
5 Land at Durrant Lane, Northam	DISCOUNTED Wildlife corridor identified in Devon Biodiversity Plan. Site within and does not conform to Local Plan strategic Green Wedge policy.	
6 Land behind Tregarthyn, Durrant Lane, Northam	DISCOUNTED Locally unacceptable. Site creates dense continuous form of development. Site on margin of and potentially undermines Local Plan strategic Green Wedge policy.	

Shortly after the conclusion of this process the NDAT Local Plan was adopted with a full set of housing allocations to meet identified housing need in the Northam Neighbourhood Plan area.

2.12 On 26.11.18 two members of Torrridge District Council's Planning team attended the Steering Group meeting and provided initial guidance and feedback on the draft policies. The guidance and advice received was addressed in a review of the Plan in December 2018 and January 2019. This review resulted in numerous modifications to policy text and produced a draft Plan for initial consultation.

3 Summary of consultation on the draft Plan

Once the Steering Group had agreed a set of draft policies an initial consultation was held, this time focussing on the draft policies.

3.1 Who was consulted?

As with the initial phase of community engagement, the initial consultation was aimed at every resident in Northam Parish.

3.2 How were they consulted?

- The draft policies were presented at three public meetings held in March 2019 (one in each settlement). An additional public meeting was then held in Appledore in April 2019. This meeting was organised by the Appledore Residents' Association.
- The draft policies were presented on the Northam Neighbourhood Plan website and via Facebook publicity.
- People attending the meetings and visiting the website or Facebook page were encouraged to fill in a questionnaire. A copy of the questionnaire used is in Appendix 1 of this document.
- In July 2019 a focus group was held to enable young people to discuss the impact of the draft policies on younger people. The focus group consisted of local students attending Bideford College.

3.3 The questionnaire was designed to assess levels of support for each draft policy and allow respondents to make detailed comments and suggestions for each draft policy.

3.4 What did the consultees say?

With the exception of one policy, the draft policies were strongly supported, albeit some more so than others. Summaries of the support for each draft policy consulted on are given below. The present policies for which no figures are given had not yet been drafted at the time of the Draft Plan Consultation. (It should be noted that the sites included in Policy EN1a) were part of Policy EN1; and Policy EN3a) was derived from clause 1 of Policy EN3.) Policies subsequently removed from the Plan are not shown.

Table 2: Summary of responses to the Spring 2019, Initial Consultation using present policy numbers

POLICY (2019 policy numbers in parenthesis):	SUPPORT % (numbers of responses in parenthesis)	DO NOT SUPPORT % (numbers of responses in parenthesis)
EN1/EN1a) (NNP1)	95 (19)	5 (1)
EN2 (NNP2)	98 (56)	2 (1)
EN3/EN3a) (NNP3/NNP4)	94.5 (54)	5.5 (3)
EN4 (NNP5)	98 (52)	2 (1)
EN5 (NNP7)	100 (32)	0 (0)
HE1 (NNP6)	96 (50)	4 (2)
TR2 (NNP9)	100 (35)	0 (0)

HO1 (NNP15)	86.5 (19)	13.5 (3)
HO3 (NNP12)	100 (19)	0 (0)
DE1 (NNP11)	100 (19)	0 (0)
DE2 (NNP8)	97 (32)	3 (1)
TR1 (NNP14)	100 (19)	0 (0)
ED1 (NNP17)	90.5 (19)	9.5 (2)
ED2 (NNP18)	9.5 (2)	90.5 (19)
HE2 (NNP19)	79 (19)	11 (5)
ED3 (NNP20)	90.5 (19)	9.5 (2)

3.5 It is considered that the slightly lower percentage support for policy HE2 reflected mixed views in the community about the potential uses for the Richmond Dock, Appledore site.

3.6 In numerical terms there were far more supportive responses for policies EN2, EN3 and EN4 than the other policies.

3.7 How were the issues and concerns responded to?

Following the conclusion of the initial consultation, the Steering Group assessed and discussed the feedback and completed a thorough review of all policies and text in the draft Plan. The review of the draft Plan incorporated detailed feedback from the initial consultation.

Only one policy, NNP18 (now ED2) was not supported by respondents to the consultation. As detailed in the Record of Community Engagement, this policy was subsequently amended to take account of the concerns expressed by respondents. The main policy alterations may be summarised as follows (present policy references have been given, (2019 policy numbers in parentheses)):

- EN1/EN1a) (NNP1) - additional Local Green Space sites identified as suggested by consultees.
- EN4 (NNP4) - additional valued view suggested by consultees.
- EN5 (NNP7) - additional green corridor suggested by consultees.
- ED1 (NNP17) and ED2 (NNP18) - unsustainable development not supported in undeveloped coast.
- ED3 (NNP20) in its present form informed by consultation responses showing strong support for continuing maritime-related industry at Appledore Shipyard.

3.11 After the initial consultation, the Steering Group was confident that the vision and objectives and policies of the Plan reflected the concerns and aspirations of the local residents of Northam Parish. In 2019 the Steering Group was reconstituted as the Northam Neighbourhood Plan Advisory Group (hereinafter the Advisory Group). The Advisory Group retained most of the members of the Steering Group, however it functioned as an advisory sub-committee of Northam Town Council and subsequent meetings were conducted according to the standing orders for such sub-committees.

3.12 In 2020 and 2021 the process of community engagement was slowed and interrupted by the COVID-19 pandemic. The Facebook page and Northam Neighbourhood Plan website material continued to be available online and the Steering Group continued to hold virtual meetings. This has enabled public interest to be sustained in the preparation of the Plan.

3.13 By spring 2022 the Advisory Group had made substantial progress in improving the text of individual policies, and producing refined supporting text and images. As a result of the on-going process of policy discussion and review, two policies from the 2018 draft of the Plan, (NNP13 Full-time residence and NNP16 Broadband) were removed from the Plan. Although both policies received substantial support in the 2019 consultation, the Advisory Group concluded that they would have been unable to meet the basic conditions for neighbourhood plan policies.

4 Summary of consultation with Torridge District Council Planning

4.1 Who was consulted?

In May 2022 the then current draft Plan (v. 2.8 March 2022) was submitted to the Torridge District Council planning team, who were invited to make detailed comments.

4.2 How were they consulted?

A meeting was held between representatives of Torridge District Council Planning team and representatives of the Advisory Group. In addition the Torridge District Council planning team wrote a full set of written comments. The Advisory Group considered the comments from June 2022 onwards.

4.3 What did the consultees say?

The Torridge District Council planners made numerous general and specific suggestions. In particular it was suggested that:

- Policies could be grouped thematically.
- The Plan should ensure consistency of policies in guiding development in given areas.
- Policy language should be clarified in order to provide clear guidance for development applications.
- Specific policies should be clearly and appropriately evidenced.
- The Plan should have a glossary
- There should be a consistent presentation format for objectives and supporting text.
- A range of specific presentational and editorial alterations.

4.4 All the suggestions and comments raised by the consultees were considered and acted upon by the Advisory Group. In particular:

- The Plan was restructured on thematic grounds as suggested. All policies were re-numbered.
- The Vision and objectives of the Plan were clearly stated and linked to the policies as suggested.
- Policy HO7 Residential Care and Nursing Homes and Policy TR3 Public Transport were removed from the draft Plan.
- Policies EN5, HE2 and ED3 and their supporting texts were substantially rewritten to address points regarding these policies made by the consultees.
- All other policies and supporting text were reviewed and all were partly altered to address the general and policy-specific points.

5 **Summary of Pre-submission Consultation**

5.1 Who was consulted?

As required under Part 5, Section 14 of the Neighbourhood Planning (General)

Regulations 2012, Northam Town Council undertook a six-week pre-submission consultation on the proposed Neighbourhood Plan, between the 6th January and the 17th February 2023. The pre-submission consultation provided the opportunity for local people, landowners, businesses, and organisations to comment on the draft plan.

5.2 Within this period Northam Town Council:

- Publicised the draft Neighbourhood Plan to all that live, work or do business within the parish
- Outlined where and when the draft Neighbourhood Plan could be inspected
- Detailed how to make representations, and the date by which these should be received

5.3 How were they consulted?

A copy of the draft Neighbourhood Plan was available to download on the Neighbourhood Plan section of the Northam Town Council website.

Paper copies of the Plan were placed for public reference in safe and accessible locations in each settlement. All locations were accessible for people with reduced mobility. Copies were provided at no cost upon request. These locations were:

- Appledore Library
- Northam Library and Northam Town Hall
- Summerlands Tackle, Westward Ho!
- A short summary of the policies and a questionnaire form was sent to every household in the parish. Consultees could respond: SUPPORT, DON'T SUPPORT, or NEUTRAL to each policy and make detailed comments. A copy of the questionnaire used is in Appendix 1 of this document.

There was extensive publicity of the Plan and consultation events on Facebook.

A number of posters were placed in each settlement with details of the consultation, the website and a QR code to access the website.

Afternoon/early evening drop-in sessions concerning the Draft Neighbourhood Plan were arranged in each of the three main settlements: Appledore on Wednesday 8 February; Northam on Thursday 9 February; and Westward Ho! on Monday 13 February. All locations were accessible for people with reduced mobility. At each of these sessions, there was an exhibition explaining the Plan and its policies, and copies of the Plan were available along with members of the Advisory Group to answer questions. People attending the drop-in sessions were encouraged to complete the consultation questionnaire.



Consultation at Appledore, February 2023

Any statutory consultation body (referred to in Paragraph 1 of schedule 1 of the Neighbourhood Planning (General) Regulations 2012) whose interests may be affected by the proposals within the draft Neighbourhood Plan were consulted. They were as follows: a) Torrridge District Council; b) Devon County Council; c) Adjoining Parish Councils; d) The Coal Authority; e) Homes England; f) Natural England; g) The Environment Agency; h)

Historic England; i) Network Rail; j) The Highways Agency; k) The Marine Management Organisation; l) South West Water; m) Northern Devon Healthcare NHS Trust; n) North Devon AONB Partnership; o) Devon and Cornwall Police; p) TTVS; q) North Devon Plus.

In addition landowners affected by the Plan and 82 local businesses, charities and stakeholder groups were invited to comment on the Plan.

5.4 What did members of the public, landowners and businesses say and how were the issues responded to?

There were 504 responses by members of the public to pre-submission consultation. In nearly all cases the responses were either made by completing the questionnaire online or by returning completed paper copies of the questionnaire. All policies were supported by a majority of respondents. The policies that received 90% support or more were EN3, EN1/EN2, CF1/EN5, HE1, EN4, and ED3. The only policies that received less than 70% support were ED1, ED2 and HO1. The responses are summarised in Table 3 below:

Table 3: Summary of public responses to the pre-submission consultation by percentages (numbers in brackets, where a policy reference has changed the original reference is given in brackets)

POLICY	SUPPORT %	DO NOT SUPPORT %	NEUTRAL %
CF1: COMMUNITY FACILITIES	96.5 (491)	0 (0)	3.5 (17)
HO1: SIZE OF DWELLINGS	50.5 (254)	22.5 (114)	27 (136)
HO2: NEW AFFORDABLE HOUSING	80 (403)	10.5 (54)	9.5 (47)
HO3: RESIDENTIAL DESIGN AND AMENITY	77 (387)	6.5 (34)	16.5 (83)
TR1: RESIDENTIAL PARKING PROVISION	83 (418)	5.5 (28)	11.5 (58)
(HO4) DE1: QUALITY OF DESIGN	84 (423)	7 (35)	9 (46)
(HO5) DE2: RENEWABLE ENERGY	85 (430)	5.5 (27)	9.5 (47)
(EN1) EN1: LOCAL GREEN SPACES EN1a): OPEN SPACE AND RECREATION	97 (490)	2 (8)	1 (6)

EN2: PROTECTING THE IDENTITY OF SETTLEMENTS	97 (490)	1 (6)	2 (8)
(EN3) EN3: PROTECTING RURAL CHARACTER EN3a): PROTECTING DARK SKIES AND REDUCING LIGHT POLLUTION	97.5 (491)	1 (6)	1.5 (7)
EN4: PROTECTING VALUED VIEWS	91 (460)	1 (5)	8 (39)
HE1: CONSERVATION OF HERITAGE ASSETS	96 (485)	0.5 (3)	3.5 (16)
EN5: PROTECTION OF GREEN CORRIDORS AND BIODIVERSITY ENHANCEMENT	96.5 (487)	0.5 (3)	3 (14)
TR2: CYCLE AND PEDESTRIAN ROUTES	83.5 (422)	3 (15)	13.5 (67)
ED1: BUSINESS	67.5 (340)	5 (26)	27.5 (138)
TR3: PUBLIC CAR PARKING	86.5 (436)	2 (9)	11.5 (59)
ED2: TOURISM ATTRACTIONS AND ACCOMMODATION	60.5 (304)	12 (61)	27.5 (139)
HE2: RICHMOND DOCK	89 (450)	2 (9)	9 (45)
ED3: APPLIEDORE MARITIME EMPLOYMENT ZONE	90.5 (456)	0.5 (3)	9 (45)

In addition members of the public submitted 117 comments to the pre-submission consultation. In nearly every case these comments were added to the online or paper questionnaire. It should be noted that some of these comments were either/general or not related to policy areas covered by the Plan. The full text of the comments is set out in Appendix 2 of this document (page 34), which also includes an analysis of the relevant comments and a summary of action taken in response to these comments.

One stakeholder group, the South West Coast Path Association, responded to the pre-submission consultation. This response and a summary of action taken is set out in Table 3a) below:

Table 3a): Response from the South West Coast Path Association (SWCPA) and action taken

TOPIC	ACTION TAKEN
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<p>GENERAL</p> <p>Northam parish is a key part of the UK's longest national trail, the South West Coast Path (SWCP) and we are pleased to see the SWCP mentioned in a number of the Plan's objectives and policies.</p>	<p>Comment noted.</p>
<p>POLICIES EN2, EN3/EN3a), EN4 AND TR2</p> <p>The Association particularly supports policies EN2, EN3, EN4 and TR2 all of which recognise that the coast path is an integral part of the local environment and of significant importance to local residents, visitors and the wider economy. The Association supports the aims of the Neighbourhood Plan and policies EN3 and EN4 to protect the landscapes identified as being of particular significance in the area. The maintenance of landscape quality and landscape character as a backdrop to the SWCP is of importance to its integrity and the positive experience of its users.</p>	<p>Comments noted</p>
<p>POLICIES EN4 AND TR2</p> <p>The Association supports the aims of Policy EN4 to protect important coastal views and access to the views from the coast path, an objective recognised nationally through the development of the England Coast Path. We would also suggest that the views from Raleigh Hill and Orchard Hill are added to the list in the Plan. The Association supports the aims of the Neighbourhood Plan and Policy TR2 to protect and enhance the local environment for the enjoyment of residents and visitors and connect people to the environment with improved walking and cycling networks.</p>	<p>Comments noted.</p>

<p>GENERAL COMMENTS</p> <p>The Association supports the objectives to meet the needs of the visitor economy and develop local tourism opportunities in the Plan area. The SWCP is a well established and very popular national trail, which also forms part of the new England Coast Path, providing considerable economic value to the area. The SWCP attracts 8.7 million visitors per year who spend a total of over £500 million with local businesses. The spend is attributed to staying and day visitors and supports many jobs in the local economy. Recent research by The Ramblers has shown that walking has the power to lengthen the tourism season, attracting both domestic and international visitors all year round and driving sustainable growth of the South West’s tourism economy. The SWCP provides an important link helping to bring visitors to villages and towns such as Appledore, Northam and Westward Ho!. Every £1 invested in seaside areas has the potential to boost the local economy by £8.</p>	<p>Comments noted.</p>
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No formal responses were received from landowners affected by the Plan, although one landowner chose to respond as a member of the public and in consequence one proposed Local Green Space (Knapp Wood) was removed from policy EN1 (see Table 7, Appendix 2, page 41. Two written responses were received from businesses. These were Baker Estates Ltd., and Everything is Somewhere on behalf of Richmond Dock. These comments and the action taken are summarised in Table 4 below.

Table 4: Summary of comments submitted by businesses and action taken

BUSINESS	SUMMARY OF COMMENTS	ACTION TAKEN
Baker Estates Ltd.	HO1 – Support for bungalows. Older people and homeworkers may seek larger	Comments noted.

	properties.	
Baker Estates Ltd.	DE1 (HO4) – Clarify ‘low ecological (impact) materials’.	Comments noted
Baker Estates Ltd.	DE2 (HO5) – Clarify ‘alternative energy systems’.	Comment noted and policy text amended with ‘renewable energy systems’. This phrase defined in supporting text.
Baker Estates Ltd.	EN2 – Some areas of Map N1 not situated between settlements. Policy needs re-wording to ensure it supports development in undeveloped coast in conformity to Local Plan.	As noted in Appendix 4, Table 14, policy as amended in 2024 takes account of comment.
Everything is Somewhere on behalf of Richmond Dock.	Proposed development in Richmond Dock conforms to policy HE2: Richmond Dock	Comments noted.

5.5 What did the statutory consultees say and how were the issues responded to?

All Statutory bodies listed in section 5.3 were emailed a letter inviting them to comment on the draft submission documents. Nine of the statutory bodies responded to the letter. These were:

- The Environment Agency;
- Devon and Cornwall Police;
- NHS Devon Integrated Care Board (ICB);
- North Devon AONB Partnership
- The Marine Management Organisation (MMO)
- Torridge District Council. In addition Torridge District Council engaged an independent examiner, Derek Stebbing BA (Hons) Dip EP MRTPI (Intelligent Plans and Examinations Ltd), to make a health check of the Plan. (It should be noted that this health check included the Plan, its appendices, and the Record of Community Engagement but none

of the other supporting documentation).

- Historic England
- Natural England
- The Coal Authority

In brief, all the comments made by statutory consultees and in the health check were reviewed and, where relevant, acted upon and the Plan amended accordingly. The comments made by the statutory bodies and resulting amendments made to the Plan are summarised in Appendix 3 of this document (page 42).

5.6 From March 2024 the Northam Neighbourhood Plan Advisory Group has reported to the Planning and Development Committee of Northam Town Council.

6 Pre-submission Consultation of landowners

6.1 Who was consulted?

In December 2024- January 2025 there was a final consultation of landowners of property included in policies EN1: Local Green Spaces. The landowners and the sites in questions are set out in Table 5 below.

6.2 How were they consulted?

The landowners were consulted by letter, or email where known. Where no response was received, a follow-up letter or email was sent. With respect to land owned by Northam Town Council, Northam Town Councillors were asked to state their views in full council meeting on 22.1.25.

6.3 What did members of the landowners say and how were the issues responded to?

Table 5: Summary of comments submitted by Landowners and action taken

LANDOWNER	SITE	SUMMARY OF COMMENTS	ACTION TAKEN
Church of England, Exeter Diocese	Rectory Gardens,	Objects to inclusion of site as LGS on the grounds it is a private garden with limited discretionary public	On further consideration the site was removed from Policy EN1.

		access.	
Northam Town Council	Blackies, Appledore; Anchor Park, Appledore; Westward Ho! Park; Burrough Farm, Northam	Northam Town Council unanimously supported designation of all sites as LGS.	All sites designated as LGS.
Torrige District Council	Humpty-Dumpty Field; Hillcliff Gardens; The Village Green (Westward Ho!); Tors View	Torrige District Council has no objection to the designation of Humpty-Dumpty Field and Hillcliff Gardens as LGS's. They make no formal response on The Village Green (Westward Ho!) and Tors View.	All sites designated as LGS.
Westward Housing	The Backfield, Appledore (East Appledore Village Green)	Consultee supported designation of site as LGS.	Site designated as LGS.
Savills on behalf of	Northam; Allotments, Marshford, Northam	No response.	Site designated as LGS.

7 Final Health Check

7.1 In November 2023 the Advisory Group decided to commission a final health check prior to ensure the Plan was fully ready for examination. In October 2024 Deborah McCann BSc MRICS MRTPI Dip Arch Con Dip LD, an NPIERS Examiner, was commissioned to undertake this work. Ms McCann issued a draft health check report in November 2024 and a final report in January 2025. Ms McCann's recommendations and the actions taken in respect of each policy in the Plan are set out in Appendix 4 of this document (page 63).

7.2 The conclusions of the Final Health Check Report were as follows:

Conclusions

Having reviewed the Plan, I am of the opinion that:

1. The Northam Neighbourhood Development Plan has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the subsequent Neighbourhood Planning (General) Regulations 2012. (As amended)
2. The Neighbourhood Plan does not deal with County matters (mineral extraction and waste development), nationally significant infrastructure such as highways and railways or other matters set out in Section 61K of the Town and Country Planning Act 1990.
3. The Northam Development Plan does not relate to more than one Neighbourhood Area and there are no other Neighbourhood Development Plans in place within the Neighbourhood Area.
4. The Northam Neighbourhood Development Plan and the policies within it, subject to the recommended modifications would meet the Basic Conditions.
5. The Strategic Environmental and Habitats Regulations Assessment screening meet the EU Obligation.
6. The policies and plans in the Northam Neighbourhood Development Plan, subject to the recommended modifications would contribute to achieving sustainable development. They have regard to national policy and to guidance, and generally conform to the strategic policies of the North Devon and Torridge Local Plan, adopted 2018.
7. The Consultation Statement sets out clearly the process followed in consulting on the revised neighbourhood plan, including at Regulation 14. It records the people consulted and how responses to the consultation have been dealt with as required.

7.3 As stated in Appendix 4, all the general recommendations and all the recommended policy modifications in the Final Health Check Report were accepted, and the modified document was finalised as the submission Northam Neighbourhood Development Plan.

8 Conclusion

8.1 The programme of community consultation carried out during the production of the Northam Neighbourhood Plan was extensive and varied. It reached a wide range of the local population and provided opportunities for many parts of the local community, including people of different ages and diverse social groups, to have an input or make comments on the draft Neighbourhood Plan.

8.2 This consultation statement and the supporting consultation reports are considered to comply with Section 15(2) of part 5 of the 2012 Neighbourhood Planning Regulations.

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APPENDIX 1 – QUESTIONNAIRES USED FOR COMMUNITY ENGAGEMENT

(Draft) initial engagement survey - Autumn 2017



Northam Neighbourhood Plan NEEDS YOU!

Introduction

What is a neighbourhood plan?

Neighbourhood planning is a right for communities introduced through the Localism Act 2011. Communities can shape development in their areas through the production of a Neighbourhood Development Plan. Neighbourhood Development Plans become part of the Local Plan and the policies contained within them are then used in the determination of planning applications.

What we need from you?

In this leaflet is a questionnaire that will help inform us what exactly is needed and desired from the residents of the Northam Parish in the creation of our neighbourhood plan.

How to respond?

There are a variety of ways to respond to the questions outlined in this leaflet;

- Write directly onto this leaflet and return to *post office? Particular shops? The Church? Council office?*
- Visit our website and fill in the electronic copy.
- Email your response to survey@northamtowncouncil.gov.uk
- Or respond to the questionnaire via our Facebook page???

Initial questionnaire

Why bother?

We are aware that your time is precious but we really need and value your response, therefore all completed questionnaires whether digital or paper copy will be entered into a prize draw with the chance to win... (see back page for details).

POSTCODE	
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Age:

12-17		45-54	
18-24		55-64	
25-34		65-74	
35-44		75	

How long have you been a resident of the Northam Parish?	
--	--

Which areas would you most like to see developments/investments in around Northam Parish? (Tick your top 3)

New homes	
Leisure facilities	
Business/office spaces	
Parking	
Technology	
Schools/nurseries/childcare	
Green spaces	
Healthcare facilities	
Transport	
Young people	
Roads/pathways	
Other (Please specify below)	



<p>What do you value the most about the Parish of Northam?</p>
<p>What are your biggest concerns about the Parish of Northam?</p>

<p>What do YOU think of the Northam Parish?</p>
<p>What do YOU want the NNP to address?</p>

YOUR INVOLVEMENT DOESN'T END HERE!

There is a long way to go to a finished Neighbourhood Plan which will require further involvement from you along the way. We need as much feedback as possible to create an in-depth neighbourhood plan that will benefit as many residents of the Northam Parish as possible!
Please spread the word, visit our website, email us with any feedback and like our Facebook page.

****Include website details, email and Facebook page name here****

After all it is; **Our Plan, Our Future.**

PRIZE DRAW

If you would like to be entered into our prize draw, please give your contact details below. All information will be treated confidentially in accordance with the Data Protection Act and only used in connection with the Neighbourhood Plan.

Name		
Address		
Telephone		
E-mail		
I would like to sign up for the Council's e-mail newsletter	YES	NO

Initial Questionnaire, Spring 2018

Home address: Northam Appledore
 Westward Hol Orchard Hill

How long have you lived in the Northam Town Council area? Years


Your Age: 5-11 12-17 18-24 2-34 35-44 45-54 55-64 75-74 75+

Do you have any concerns about your area?


.....

What do you value about your area?

.....



NORTHAM NEIGHBOURHOOD PLAN
YOUR PLAN, YOUR FUTURE



APPLEDORE, NORTHAM, ORCHARD HILL and WESTWARD HO!
www.northamneighbourhoodplan.co.uk

What is a Neighbourhood Plan?
 The Neighbourhood Plan, when adopted will be a legal planning document that Torridge District Council planning officers will have to refer to when considering planning applications in the Northam Town Council area of Northam, Appledore, Orchard Hill & Westward Ho! It is a formal document that gives communities a legal right to shape the development and growth of their neighbourhood.

Stage one of our plan is to get initial feedback from residents about the most important priorities that should feature in our Neighbourhood Plan.

What is most important to YOU about your neighbourhood?
 What gets in to the plan is up to YOU the residents of Northam, Appledore, Orchard Hill & Westward Ho! This plan is about what YOU think!
 Provision of enough school places, local healthcare, recreation, supply of affordable housing for rent and buying, local jobs, upkeep of historic buildings and heritage; parking, green-spaces and water quality... all these and many more local services and development priorities are part of what could be included in YOUR Northam Neighbourhood Plan.

What next? Your opinion matters to us!
 Please encourage all family members to have their say. *Everyone's opinion matters!*

- Complete the survey either online or use the QR code to take you straight to the survey: www.northamneighbourhoodplan.co.uk
www.facebook.com/NorthamNeighbourhoodPlan
- Return it in one of these ways:
 - Write directly onto this leaflet and return to:
 FREE POST, NORTHAM TOWN COUNCIL
 - Drop off at the collection boxes in any of the following locations:
 Northam Library, Northam Surgery, Costcutter (Northam), Witten Lodge Vets, Co-op (Westward Ho!), Nisa (Westward Ho!), Johns (Appledore) and The Quay Gift Shop (Appledore).
- Keep an eye out for updates, results of the survey and further consultation events as we go through the process.

Want to get involved?
 Please contact: The Town Clerk, Northam Town Council
 Email: townclerk@northamtowncouncil.gov.uk
www.northamneighbourhoodplan.co.uk
www.facebook.com/NorthamNeighbourhoodPlan

What is most important to you about your neighbourhood?
 Please number the list below in order of importance to you - 1 being the most important and 7 being the least.
 If you wish to leave specific comments concerning one or more of the areas then please write this in the spaces provided below each heading.

Business / Employment and Tourism Comments:	
Health and Leisure Comments:	
Green Spaces and Heritage Comments:	
Schools / Nurseries / Childcare Comments:	
Housing Comments:	
Transport / Parking / Roads / Pathways Comments:	
Technology and Renewable Energy Comments:	

Initial Consultation Questionnaire – Spring 2019



<p>NNP7 Protection of Biodiversity</p>	
<p>NNP8 Energy Conservation and Carbon Reduction</p>	
<p>NNP9 Cycle and Pedestrian Routes</p>	
<p>NNP10 Residential Care and Nursing Homes</p>	
<p>NNP11 Quality of Design</p>	
<p>NNP12 Footprint of New, Redeveloped and Replacement Dwellings</p>	
<p>NNP13 Full-Time Principal Residence Housing (Appledore)</p>	
<p>NNP14 Parking Provision</p>	

This can also

**Policy N
& Num**

NNP1
Local Green
Spaces

NNP2
Prevention of
Coalescence
between
Settlements

NNP3
Retaining the
character of
rural landsc
between
settlements

NNP4
Protection and
Enhancement
of Boundaries
between
Settlements

NNP5
Protecting
Views

NNP6
Protection of
Heritage Assets

NNP15 Size of Dwellings	
NNP16 Broadband	
NNP17 Business	
NNP18 Tourism Attractions & Accommodation	
NNP19 Richmond Dock	
NNP20 Appledore Shipyards Site	
Your Details	
Name	
Address	
E-mail Address	
I would like to receive e-mail updates from the Town Council (please indicate)	YES
	NO



NORTHAM NEIGHBOURHOOD PLAN

**PRE-SUBMISSION
CONSULTATION**

**6th JANUARY to
17th FEBRUARY 2023**

***YOUR NEIGHBOURHOOD, YOUR
PLAN, YOUR SAY.***

A Neighbourhood Plan gives a community direct power to develop a vision for their local area. It will help identify where new homes and businesses can be built and where they can't. The Neighbourhood Plan gives the community a say in what infrastructure should be provided and provides an opportunity to plan for the type of development that meets the community's needs.

Northam Town Council decided in May 2017 to develop a Neighbourhood Plan, which covers the whole of the civil parish of Northam, so includes Appledore, Northam, Orchard Hill and Westward Ho!

Assisted by volunteers from the community, the Town Council is now in a position to present the Neighbourhood Plan to the community for review.

How to have your say ...

Please visit the website (www.tinyurl.com/bdzmc5rj), or scan the QR code below to read the full Neighbourhood Plan and fill in the survey online (or print it out if you wish) ...



Credit: G Hobbs 2022

OR fill in the survey on the last two pages of this leaflet and drop it into one of the places below.

Copies of the Northam Neighbourhood Plan will be available at:

The Library in
Appledore.

The Library and
The Town Hall in
Northam.

Summerlands Tackle
in ***Westward Ho!***

Meet members of the Council and the Advisory Group to answer questions and talk things through.

- ⇒ *Wednesday 8th February, APPLIEDORE
St. Mary's Church Hall 3pm to 7pm.*
- ⇒ *Thursday 9th February, NORTHAM:
Town Hall, Windmill Lane 3pm to 7pm*
- ⇒ *Monday 13th February, WESTWARD HO!:
Kingsley Hall 3pm to 7pm*



Please scan QR code above for more information, access to the webpage and the full Neighbourhood Plan.

 *Tear or cut here.*

NORTHAM NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION SURVEY.

YOUR POSTCODE: _____

For each policy please indicate your view by ticking the relevant column
SUPPORT , **DON'T SUPPORT** or **NEUTRAL**

POLICY	What it supports, protects or provides	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CF1 COMMUNITY FACILITIES	Community facilities and buildings from closure.			
HO1 SIZE OF DWELLINGS	New 1, 2 & 3 bedroom easily adapted homes.			
HO2 AFFORDABLE HOUSING	Maximising the number of affordable homes on new developments.			
HO3 RESIDENTIAL DESIGN AND AMENITY	Providing safe and pleasant places to live.			
HO4 QUALITY OF DESIGN	Developments of good design, which respect local character and the environment.			
HO5 ENERGY CONSERVATION AND CARBON REDUCTION	New eco-friendly homes, community-scale energy generation, accessible public transport.			
TR1 RESIDENTIAL PARKING PROVISION	Development with sufficient parking places, electric charging points and cycle storage spaces.			
EN1 LOCAL GREEN SPACES	Sixteen locations of community value to be protected from development as local green spaces.			
EN2 PREVENTION OF COALESCENCE	Protects the countryside between Northam/Westward Ho! and Appledore from development.			
EN3 PROTECTING RURAL CHARACTER	Protects rural character of the area between Northam/Westward Ho! and Appledore.			

...Please turn over ...

POLICY	What it supports, protects or provides	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
EN4 PROTECTING VALUED VIEWS	Seven valued views in Northam Parish.			
HE1 PROTECTION OF HERITAGE ASSETS	Protects valued heritage sites from harmful development.			
EN5 PROTECTION OF BIODIVERSITY	Protects and enhances biodiversity plus five green corridors and nine wildlife sites.			
TR2 CYCLE AND PEDESTRIAN ROUTES	Upgraded or extended footpaths, and cycleways.			
ED1 BUSINESS	Supports economic development within settlements and provides guidance on what's OK elsewhere.			
TR3 PUBLIC CAR PARKING	Maintain and improve public car parking in each settlement.			
ED2 TOURISM ATTRACTIONS AND ACCOMMODATION	Supports tourism development within settlement boundaries and provides guidance on what's OK elsewhere.			
HE2 RICHMOND DOCK	Supports maritime-related or small business development to preserve the heritage character of the Dock.			
ED3 APPLIEDORE EMPLOYMENT ZONE	Appledore docks and Shipyard as an area for maritime-related employment development.			

ARE YOU INTERESTED IN HEARING MORE ABOUT THE NEIGHBOURHOOD PLAN OR HELPING WITH ITS FURTHER DEVELOPMENT? **YES/ NO** (delete as appropriate) (if YES, please provide contact details below).

OPTIONAL SECTION

YOUR NAME: _____

YOUR PHONE/ EMAIL: _____

GENDER: (delete as appropriate) **M F non-binary Prefer not to say**

IN WHAT YEAR WERE YOU BORN? _____ **Prefer not to say**

**PLEASE TEAR ALONG DOTTED LINE AND RETURN THIS FORM TO:
NORTHAM TOWN HALL, WINDMILL LANE, NORTHAM, EX39 1BY (or one of the
locations on page 2) ON OR BEFORE 17TH FEBRUARY 2022. THANK YOU.**

APPENDIX 2 – PUBLIC COMMENTS SUBMITTED TO THE PRE-SUBMISSION CONSULTATION

Table 5 – Full text of public comments to the pre-submission consultation

Respondent ID	If you have any other points you'd like to add, please enter them below.
7	The few previous green spaces that we had at the moment MUST REMAIN, we need to look after nature's habitat as well as our own
8	Protect the divide of Appledore and Northam
12	Our neighbourhood is being degraded year after year with poor quality housing estates built on green fields. Traffic and associated pollution are awful. Enough is enough. We need a new approach and I hope this plan resets the current damaging planning trajectory.
15	Let's make sure we protect our green spaces, stop building on every little bit of land left in appledore and westward ho
22	Please do not over-develop this beautiful area; it is becoming over-run with housing. We need to leave our valuable green spaces, both for tourists and local inhabitants.
24	We do not understand why wanting to develop on greenfields when the local town's i.e. Bideford and Barnstaple desperately need regeneration
33	Buckeigh Road needs to be widened, it is already too narrow to support the existing traffic so when the housing developments in Comborough and Bay View are completed the situation will become dangerous
40	I am particularly concerned about the talk of building on Bone Hill Carpark. This would have a severe detrimental effect on the local area. Its closure as a carpark would affect the church, the shops and lots of local amenities, as it's very difficult to park elsewhere.
41	Decent affordable housing should be the number one priority for the council
42	Whilst I understand that Northam Council is powerless in the planning approval process, I do NOT support further new housing developments. The local infrastructure is already under considerable pressure...if not already inadequate...to serve the existing population, and new housing developments must only exacerbate that problem. In my opinion, this is only common sense, but seems to be totally ignored, and NEVER addressed by those whose function is surely to take all such factors into account. One can only reach the conclusion that priority is given to targets established by people living nowhere near, and having no knowledge of, the area, and of course, more houses equals more income from council tax.
43	Traffic free cycle routes as level as possible must be developed as soon as possible.
44	parking, parking, parking (Appledore)
50	Unfortunately the plan comes too late to protect the character and ecology of Westward Ho and Northam. Much of the development damage has already been done.
52	We need to make sure that when there are housing developments that there is ample parking arrangements made. We cannot loose our car parks in Northam .Northam wasn't built for 2/3 vehicles per house, so vehicles are parked anywhere any street.
53	Northam District has lost so much green space in the last few years. It is sadly becoming a very different place. We need to protect our remaining green spaces, before it is sadly too late.
54	Please provide charging facilities for electric vehicles. There are currently no working chargers in Northam, Appledore or Westward Ho. This is short-sighted and will discourage tourists from visiting this area and residents from going green. When there was a working charger in Appledore last summer, there were sometimes queues to charge. What is going to happen this summer if the only charger is still out-of-service?
55	I support all the policies of the NNP but the policies I support the most are the policies related to heritage and the environment - EN1, EN2, EN3, EN4, EN5, HER1 and HER2.
56	Need more homes in Appledore for local people
57	Appledore needs more homes for the younger generation
58	Improved access and safe walking and cycle routes when ever possible and practical. Additional car parking provision in busy holiday areas, like Westward Ho! Safeguarding residents parking areas in areas such as Westward Ho! During busy holiday times it's some times impossible to get in and out of your own drive, due to inconsiderate visitors parking in front, or party across your drive. Maybe, restrict parking at certain times to residents only, and provide increased parking areas for non-residents.
60	Any new housing developments must take in to account whether local GP practices and dental practices have spaces for new clients. If not there should be more practices provided to accommodate new people or even existing people as there are no spaces at local dentist practices at the moment.
63	2nd home owners need some kind of financial implications for taking local housing away from those in need.
66	A policy limiting the amount of 2nd homes in each settlement A policy that all second home owners pay additional council tax for the 2nd home as these 2nd homes are what is causing young people to not be able to afford or get onto the property ladder.
73	Point 2, size of dwellings, discriminates against minority ethnic families that tend to require larger homes - in all other respects we support point 2 Also, in Point 7 we would make a plea for the provision of electric car charging points in Appledore Odun Road carpark, not just on 'new developments'

77	I like the idea of one site parking related to the numbers of bedrooms and believe it is important for new developments to have clear roads and no on street parking for good access for services vehicles and emergency services. Visitors parking should also therefore be provided by a local policy formula.
78	Make the area safe by conducting a thorough analysis of available doctors per capita - adhere to a strict number of doctors as per guidelines and do not permit any development unless there is capacity- get Doctors to sign off and take responsibility.
81	I believe the approach to Northam, Appledore, Westward Ho! is a horrible bottleneck, There has been too much development in the immediate area. Enough is enough! The slogan 'World class by nature' as one approaches the Torridge district is disgraceful when Torridge District Council continue to allow development on a huge scale!
83	Continue to regain ownership of buildings and land once owned by Northam urban district Council from IDC
88	A policy to deter second home owners. Also to improve access to affordable rental properties for local people and deter the rise of AirBnB which can be to the detriment of those needing rental properties.
94	Would like to see urgent action on the Pavilion at Westward Ho Park. This is a community resource which needs to be open ASAP
97	I am concerned that in an effort to be reasonable that we have allowed potential development if the proposer can show there is not an 'alternative'. Can we not just say no? And I am concerned that the car parking improvements are impossible if only brownfield sites are used. Can we not incorporate green field, with environmental enhancement? Ensuring that non-residents cannot purchase long term parking passes should be a factor. But I am pleasantly surprised overall at how easy it was to agree with the sentiments and detail. Thank you Northam TC.
99	Using Council owned car parks for housing is exant nonsense! With parking for the existing houses already in short supply, how can losing car parks be a good thing? Congestion caused by parked cars reduces the tourist appeal of the area and can contribute to accidents. Retaining open spaces between the parish areas is essential to maintain the identity of the areas. When planning for houses is granted, provision for schools and doctors' surgeries should be enforced. The plans existing in 2019 for these facilities in the Daddon Farm development seem to have disappeared. Use brown fields sites for housing whenever possible.
103	This is the first time I have seen the Neighbourhood Plan and I am concerned that there is very little mention of the southern part of the District. For example, no protection for the wildlife corridor between Goldsborough, Lenwood Valley. No mention of the valued viewpoint from Hilltop towards Clovelly/Hartland (much used footpaths in this area.) No protection of Silford. No protection of Goldsborough Castle area. No protection from further joining up of Northam and Bideford.
105	My name is Kevin Rowe. [REDACTED] (postcode redacted)
109	We would support the Pig on the Beach being kept as an open outdoor seating area for locals and visitors. It would not be an enhancement to build a hotel on this site.
110	There are too many new builds in the area now which is not enhancing the overall look and is placing pressure on the already stretched infrastructure. In relation to Appledore the Baker Homes development detracts the appearance of the village as well as appearing to have no eco credentials such as solar panels as mandatory. As such the 37 additional houses should be refused with the field in question being a buffer. The Bunny Homes development if approved should have eco credentials and covenants preventing holiday use. With the expansion of the shipyard surely we want the workers to be able to afford to move here to work and be part of the community? The RNLI relies on local volunteers who need to be within a certain distance of the station so affordable homes to purchase or rent is vital. Tourism is vital to the area but also has an adverse affect on the community out of season so possibly look at ways of ensuring there are not too many holiday lets? Provide electric car chargers in Westward Ho! We are lucky to live in a beautiful area and it should be preserved and nurtured at all costs.
122	Please keep Bone Hill car park. This space should not be lost to housing.
123	Information on the westbeach development site, nobody seems to know what the present situation is.
126	The best part of our community are the green spaces: the cricket ground, WI play park, the walks and woodlands, rural spaces, housing is needed but when there are derelict and incomplete building sites being vandalized and graffiti, I believe that is a greater issue and there needs to be more done to change the use of those horrible eyesores to create housing for people who live and work locally.
131	Derelict buildings becoming dangerous and eyesores
137	Developers should look to existing run down buildings to redevelop, NO more new rebuilds are required within the community...
139	Support increased infrastructure commitment for health amenities and waste water processing plant urgent improvement. Transport and access needs improvement to handle increased population.
142	The green spaces such as Humpy Dumpty hill and Westwood Ho park are absolutely vital for the residents.
143	Better maintenance of pavements and more dropped kerbs needed for wheelchair and mobility scooter users, please.
146	Let's have truly affordable housing so people aren't left homeless when their situations change. Small starter homes for youngsters needing independence, more council homes to give renters security, simple family homes. Stop allowing these executive homes to be built which are doing nothing for the community but putting money in the pockets of the building companies and bringing people into the area who are able to afford the exorbitant prices. Let's look after our own! Come on Councils, think outside the box and put local needs above profit!
151	An excess of housing has already been approved which embarrasses local infrastructure - please do not approve anymore!
152	Limit housing developments on green land...ensure development happens on brown sites or derelict buildings (for example the now derelict unfinished holiday apartments in Westward Ho!). All new houses should be energy efficient and include things such as solar panels as
156	Stop building on green spaces in this area , if they still have to happen then no to second home ownership and affordable homes for local people and NHS workers . The doctors , dentist and schools are at capacity .
160	Stop all residential development if there is no guarantee of support structure like doctors and schools physically in place at the same time as existing services are already well oversubscribed. The infrastructure does not exist to cope with the obscene level of residential development in this area including the roads system whose proposed improvement plans are totally inadequate for purpose..
161	Having lived in Westward Ho! since 2009 and helped my late husband with the battle to save the local Park from 'redevelopment' I strongly agree that any future plans for this area should always have respect and consideration for all local people and the natural environment, as well as visitors. Money must never become the only criteria for progress.
163	No more housing developments !!!!!
165	To immediately demolish the derelict buildings in Westward Ho, we do not pay our council tax to have to put up with the disgusting state of these building, no more crap about " we cant find the owners" put a compulsory removal policy on them and pull them down, and by the way do not replace them with cheap crappy holiday homes.
167	Demolish half finished buildings that have been static for OVER 2 years, DEMOLISH burnt down empty buildings
169	Please save badgers wood from destruction
179	Please don't let where we live become over run with houses and no Greenland. We live in the most beautiful area that is slowly becoming consumed.

182	Support and upkeep children's play areas
183	H01-H05 are couched in terms that if you 'support' it's giving the signal that one is supporting new dwellings. There is certainly no respect for local character or good design. The area cannot support more new development. Where are the new doctors' surgeries, dentists, schools??? Road congestion has never been so bad.
185	More double yellow lines to stop side streets and cul-de-sac being packed in and blocking these areas for residents and emergency services. This would also increase the use of the car parks.
188	Policy EM: PROTECTING VALUED VIEWS - I feel that this policy should be expanded to include other views of equal value to the seven views currently selected. Specifically, views from the ERW above Appledore Shipyard, looking North and Northeast to the skyline above Appledore and the view from Pitt Lane in Appledore looking west towards Kipling Tors and Westward Ho! I will submit photographs of these views under separate cover, as this format does not facilitate the addition of supporting documentation. Thank you. Stephanie Croft, Rortholes, Appledore, EX391QB
189	Other views should be considered under Policy EM. There are fantastic views from Pitt Hill in Appledore, including south towards the river, west towards Westward Ho! and looking north from the footpath, towards the skyline at the top of Pitt. Photographs can be provided. Philip Clap EX39 1QB
190	As a lifelong resident of Torridge and a frequent visitor to Appledore, it is heart-breaking to see how the area is being ruined by soulless housing estates, with properties out of the financial reach of many local families and with no regard to infrastructure. EX39 5JP
193	We need more council properties with low rent for families in this area as its invariably only private tenant renting available or holiday let's and young families not only cannot afford to rent or are not in a secure tenancy so could be left homeless at any time, the areas are very good for low rent o.a.p Council accommodation but the area is failing families badly especially when there are so many schools and nurseries here that are used by local families, so please when you say affordable housing then please make it mean council or housing association so that families have a chance as they cannot afford to buy around here or to save up for big deposits as wages are so low, so never have chance to get on property ladder or ever buy any of the new builds being built all around them
198	Just leave something to nature and realise the roads, the schools, the doctors and dentists wont cope with hundreds of homes
214	Baker Estate Homes do not enhance the entrance into Appledore & the paint colours are awful. Boring plain cheap looking houses such a shame this was granted. No more like this please.
224	Richmond Dock - Suggest building a low level complex for over 60's (1-2 bedroom apartments) which can only be purchased by current Appledore residents. This will ensure that locals stay in the village during their later years rather than having to move to falter/easier walking areas. They are on the flat level with easy access to shops and buses. These properties must be lived in by the purchaser and not a second home. Look after your older community.
226	Consideration given to controlled parking along Atlantic Way in the form of bays with residential permitted parking or time limited parking, particularly between beach road and around Avon lane. It can be very dangerous pulling out at the top of Avon lane, there is lots of double parking making it difficult for cars, buses and lorries to pass through, people park on the pavement thus blocking access for pedestrians, buggies, and wheelchairs, solid parking prevents safe passing places and as a parent with young children trying to cross from our home to the pavement or vice versa - it's frightening as visibility is limited for both pedestrians and drivers as we have to cross between cars. It's noticeably significantly busier year on year and this is before the summer season has started.
229	Stop building. If there weren't so many second and third homes there'd be plenty of places to live. The people buying the overly priced new houses are moving from outside of the area and pushing out locals. Multiple home owners are preventing local people from buying property and getting on the property ladder. Local residents should get first refusal on properties and they should be made more affordable for them first instead of being outbid by people on London wages who can throw large sums of money at a part time home or holiday home. The money doesn't even support the local economy if they don't live here! It'll be like St Ives soon, soulless.
231	Restrict amount of housing development and second homes including holiday let's. Appledore is now over 60% holiday accommodation, if this carries on there will be no community.
232	Norham Town Council are to be applauded for this pre-submission consultation document. To preserve our communities of Appledore, Norham and Westward Ho! as separate entities is essential to maintain the uniqueness of these beautiful areas. The problem as I see it is that HM Government and Torridge District Council run rough shod over your ideals. Wealthy development companies can afford to appeal against planning permission refusal, whereas our councils cannot. The Government's relaxation of planning restrictions play right into the hands of development companies. Greed for profit is their sole motivation. One such example is Chichester Home building of 10 unaffordable homes in Torridge Road, Appledore, an overdeveloped site completely out of character with other properties in the local area. Similarly Again in Torridge Road, the granting of planning permission for 6 apartments on the former site of one property, purely aimed at the second home or holiday market, certainly not for locals. I wish you well with your proposals for the future plans for our towns and villages.
233	To many new houses being built already not affordable for locals young people to purchase also wildlife and trees under threat, trees are the life of earth and other things
237	There should be an empty homes policy to ensure empty properties do not stay empty for years.
241	Only truly affordable housing, for local residents within a realistic radius, say 5 miles. Housing not available to anyone who has not been a full time resident in the area for at least 3 years. Not for landlord (buy to rent) or holiday homes. We need truly affordable housing for those currently renting that want to purchase, or first time young buyers.
242	The 3 boxes to tick are a bit ambiguous....for instance 18 Richmond Dock which I live opposite is a can of worms as we know...yes it is heritage yes it should be protected...but small business development difficult...as is building anything on there, it is right next to residential houses...
245	Resident parking scheme for Appledore is essential, Instow has one why not us? No point in any of this if the road system is neglected by DCC as it has been, the condition of our local roads is deplorable.
247	No more houses should be built in the area. Infrastructure is overwhelmed, roads are inadequate & overcrowded & will only get worse in the holiday season.
253	Any new builds should have to have solar panels and also heat /air source pumps as a minimum requirement otherwise should not be allowed
258	More medical and school facilities badly needed in any future developments.
262	My key thing is to retain the green spaces and the views for everyone. I am strongly opposed to the recent new houses destroying green space and blocking views. Further, the design of the new houses is unattractive and not in keeping with the character of the area. Either houses consistent with the old architecture should have been built or if they had to be of a modern style, at least of a character consistent with a seaside area and the surrounding premises. The new buildings I am afraid are ugly and jarring.
265	No more large scale developments on green fields.

266	make applebyrne top of richmond green a car park for school mothers fed up with them parking across my drive and there bad language in front of other children and why can they not dress half in pajamas or dressing gowns or racing to get to school because they can not get up !!
270	Would prefer new housing developments to contain buildings of 2 or 3 stories with mobility access for each floor. This could accommodate single person households with community facilities. Preferable to large housing developments with bungalows or detached properties.
271	Commendable work on this Plan, really sensitive to the beautiful, historical area we live in. Huge appreciation to all who contributed. I have supported all Policies, albeit with reservations about increased tourist accommodation (have we not reached full capacity?). Reasons being: traffic congestion and undue pressure on the tourist attractions themselves - beach, Tarka Trail. With regard to housing, perhaps consider 2-bedroomed flats along the line of Carnegie Flats which well support retired people, young single and shared single couples. Two stories do not impact on views etc. Presumably the provision of utilities, sewerage capacity etc. are well thought out.
275	Please do not join communities together. (Example No more building between Applebyrne and Westward Ho!). Before any more houses are built anywhere in this area, guarantees should be in place that there will be enough schools, doctors, dentists and other facilities to cater for all these extra people. Do you have the figures to show what percentage of houses built in Applebyrne in the last two years have been bought as holiday homes or holiday let's as opposed to permanent homes??
286	To many houses already being built on elevated land increasing water run off. What are local councils doing to prevent future flooding issues caused by the potential for more severe weather events?
292	We need to stop mass housing development until we have increased hospital beds, more doctors surgeries, more dental practices, another school and better road infrastructure the current roads are no longer suitable for the amount of traffic already using them. Removal or renovation of all unfinished/uninhabitable buildings before new planning permission given to new developments
293	Designated safe cycle/footpath (car fines free) from Westward Ho! to Bideford. Continuous (uninterrupted) pavement Bayview Road. New to build homes for permanent occupancy only, not allowed for 2nd home or holiday let. New building developments must include homes for the elderly.
296	We do not need anymore housing , we are losing our fields , farms and green spaces. Not good for the local and not good for tourism.
306	We do not need any more developments. I find it disappointing that approved developments are not required to be fully sustainable or off grid developments. Why are we not leading the way on this? This is possible and should be a condition for all developments. The threat to our cozen from increased sewerage releases, due to lack of investment in our system is a bigger threat to our local economy, health and bio diversity, than any assumed benefits. If the currently planned developments are really for the local community, then none should be sold as second homes, or investment properties yet they are always marketed as such. There is no joined up thinking on this. Countries around the world are scrambling to find ways of preserving their natural world, we are still building on ours.
309	Support for providing more medical, NHS dental and school / nursery facilities to match the growing population as a result of more housing development.
310	Please consider what is the best plan for protection of what is being offered to tourism - not housing development and unaffordable prestige dwellings. Blundering into long term problems through lack of insight. Don't lecture young people about being green when we are not showing evidence.
311	We must have infrastructure before more housing.
318	The most important aspect for me is preserving the natural resources and biodiversity of the area. Any residential developments should be to the highest environmental standards to ensure low carbon, renewable energy is incorporated, and should be affordable housing to meet local requirements. There should be no further holiday homes built. All recent developments have put pressure on already stretched local services and infrastructure- especially health services and education, and impact heavily on local roads increasing traffic flow to the detriment of road users.
320	We need better transport links especially early mornings. Buses need to leave Westward Ho to arrive in Bideford by 6.00am and link with train at 06.25 from Barnstaple. After recent changes the bus from Applebyrne at this time has been awed leaving people in the Northam area not able to get to work either in Bideford at 6.00 or Barnstaple, for 7.00am especially as many NDH shifts start at this time. The bus timetable is not fit for purpose for a ever growing community where economic development and the ability to access jobs s crucial.
322	I'm really concerned by what seem very poor planning decisions - homes out of character with the area. Plus the abandoned apartment development on Nelson Rd is an eyesore and public health hazard. The council and our MP seem powerless to intervene
325	Very glad to see policy proposals regarding parking provision in TR1 and public parking in TR3. As new residents it's clear that the currently available public parking is heavily used all year round by residents who don't have existing off-street parking of the kind suggested in TR1 or who cannot find nearby on-street parking and also for their family and their visitors (even without adding in public/tourist visitors). The recent proposals by Torridge District Council to consider Bone Hill and Windmill Lane public car parks for affordable housing is frankly unbelievable. Windmill Lane has a very limited amount of public parking as the vast majority of available spaces are numbered and reserved for residents, illustrating my point above. This particular car park could have the spaces redrawn though as there is a deal of 'wasted' area given its triangular shape. This would be a relatively simple task to redesign accurately to maximise the potential spaces. Thank you for your work on these plans.
327	When new houses are built I agree that they should have appropriate amenity space, parking, be energy efficient and affordable. No more luxury builds are required and serious consideration should be given to utilising all empty property and using brownfield sites before any more green field sites are destroyed.

328	I've lived in Torridge for over 70 years and am saddened by how this beautiful part of the world is being destroyed by greedy developers, with the Council's blessing. As one example amongst many, look how the approach to Appledore, which I visit on a regular basis to see family, has been spoiled by hideous new build properties, which show no empathy to the surrounding landscape and bear no representation of a fishing village rich in heritage. Expensive, ugly properties, which no doubt will be sold as second homes or holiday lets. I hope the NPP can go some way to halting this mindless destruction in the future, albeit the damage already done, can never be undone. Mts S EX39
329	What are the plans for the building that was the Happy Cafe in Westward Ho park?
330	1. Add a policy to support e-scooters and e-scooter hire schemes 2. Add a policy to support e-bikes and e-bike hire schemes 3. Add a policy to mandate installation of solar panels on new housing where feasible 4. More public car charging points. I understand the only one is Appledore Quay car park and it no longer works. Disgraceful! 5. Cycle route between Appledore, Northam Burrows and Westward Ho! 6. More information on public meetings and consultations. I know people in Northam who did not receive the consultation leaflet. I have never been invited to any public meeting as far as I recall, apart from this one, having lived in the area for 3 years. There should be regular meetings. It will help to build the community as well as allow our councillors to represent us better.
332	We would like The building maintained and the Cafe reopened in The park in Westward Ho please. It was an integral part of community that is missed greatly.
335	I believe no more general housing should be allowed, especially for second homes until the local needs for local people are met. Affordable homes in perpetuity. If people can't afford to live here they can't work here and this is going to become a major problem. If only the old and rich can live here who is going to look after them? We need a vibrant community for all ages so the locality survives rather than becoming a holiday park. I believe all new builds should be designed to be carbon neutral with solar panels, wind generators and insulation paramount. I think we need a total stop on new builds, apart from affordable in perpetuity until the infrastructure is resolved, such as NHS dentists and doctors and the minor injuries unit and cottage hospital are reopened. I believe all second homes should be charged at least double council tax and non-registered licensed holiday homes should pay triple council tax, such as AirBnB as they are taking away homes that could be long-term rentals.
337	As housing developments open up, they do provide green spaces and children's play areas within them. If these could be the responsibility of NIC rather than contractors think they would be better looked after. They also present new vistas which may be worthy of preserving. Think of the view from the style that separates the field from the track off of Buckleigh Road. Magnificent. Falls within the Comborough Expansion. Also an insistence on render on all houses does cause huge amounts of work for residents with repainting required so often, brick or other finishes may be easier to maintain looking good. Thanks for all your hard work.
340	Although this consultation is welcomed, it's fair to say that over recent years local residents objections to certain developments have been ignored. Green spaces have been replaced by unattractive out of character second and holiday homes.
344	To keep Bone Hill car park as a CPR BPRK and not for social housing there is insufficient parking in the area.
345	There are far too many new houses being built all around the area, we do not have enough doctors or dentists already without more people moving into the area. The traffic congestion (particularly on Heywood Road) is becoming a nightmare and this will lead to an increase in pollution. Everyone says Westward Ho! Has become an eyesore, we are supposed to be encouraging tourists, surely they come to Devon for the rural peace and quiet along with our beautiful beaches not to see derelict properties and unfinished rusty building sites. There is talk about housing being built on the car parks in Northam! Surely this is ridiculous! The roads are already congested to the point of it being dangerous.
346	I think some those holiday let's should be rented out to locals like myself who work here and have lived around here all my life who are desperate for housing
349	I support h03 to h05, particularly around affordable housing and making new housing environmentally. However I don't think the proposals go far enough - affordable housing should be a priority in the area. The local development by Baker Estates and the ever reducing number of affordable properties shows how developers will avoid their responsibilities whenever possible so it should be first and foremost rather than a home. Similarly we should be pushing for the absolute best standards in terms of quality and the environment to make our district a paragon and somewhere to be admired.
351	Second home ownership in residential terraced streets should be restricted to residential letting use only i.e. not be a holiday rental especially when insufficient parking is available. Properties in Eastbourne terrace EX39HG can accommodate 10-15+ holiday makers with only 2 off road parking spaces as part of the property. Increasingly a nightmare for people living in such streets who often can't find a parking space when it is taken over by holiday makers parking several cars. Consider resident/visitor parking permit schemes in residential streets.
352	Any new housing should be for permanent residence. No second or holiday homes. Council tax doubled or tripled for second homes & holiday homes. Developers must build the correct number of affordable homes - not acceptable to say they can't because of affordability issues. If they can't build the right number they don't build at all.
353	Buildings on SFO investigation should be permanently DEMOLISHED ,burnt down buildings should be DEMOLISHED TOO
428	Already too many tourists.
431	No more housing estates pot holes!
486	CF1 - work towards providing new ones in the new housing estates. HD4 - Not always render, requires regular painting which is costly. EN1 - new spaces in new housing developments. EN4 - New views opened up in new housing developments
495	HD2: sub clause (ii) is not clear EN1: Knapp wood is private land - so inaccessible. How can it therefore be of 'community value'? EN3: The A386 view is not the one described. EN3: Dark Skies? Really? there is a 'dark skies' designation, does anywhere in Northam have this? EN3: Where is Map N1? It needs to be closer to this wording. EN4: Sub clauses (d) and (g) are the same.
501	HD2: Please do not build on existing car parks EN1: Presumably this will include car parks - which must be protected. TF3: If possible, increase this facility.

Table 6: Summary of public comments to the pre-submission consultation and action taken

Note: only comments relevant to the Plan and its policies are included in this summary.

TOPIC	SUMMARY OF COMMENTS	NUMBER OF COMMENTS	ACTION TAKEN
Protection of green spaces/countryside	Comments supported protection of countryside and valued green spaces.	17	Protection of countryside and valued green spaces addressed in policies EN1/EN1a), EN2, EN3/EN3a), EN4, EN5, ED1 and ED2.
Concerns regarding new housing development	Concerns regarding new housing development cited excessive numbers of houses, inadequate infrastructure, and poor quality of development.	39	Quality of development addressed in policies HO3 and DE1 (HO4). All other comments noted.
Types of housing	Comments supported affordable dwellings/dwellings for local people (8); opposed use of dwellings for second homes and holiday lets (10); made suggestions for types of dwelling to suit local needs (4); suggestions for energy-efficient dwellings.	22	Support for affordable dwellings addressed in policy HO2; comments on types of dwelling addressed in policy HO1; comments on energy efficient dwellings

			addressed in policy (DE1 HO4); other comments noted.
Car parking (residential and private)	Comments supported provision of sufficient public and residential parking; three additional comments supported provision of electric vehicle (EV) charging points (3).	14 (+3)	Comments on residential parking and EV charging points addressed in policy TR1; comments on public parking addressed in policy TR3.
Cycling/walking routes	Comments support provision of more/improved cycling/walking routes. (One comment made by a representative of the South West Coast Path Association)	6	Comments on cycling and walking addressed in policy TR2. Setting of South West Coast path protected in policy EN3.
Miscellaneous comments	Suggestions for new valued views (policy EN4) (3). More protections for rural area in south of Parish (1); Support for more children's play areas (1); Suggestions for Richmond Dock development (1); Support for community facilities.	6	Comment on community facilities and children's play area addressed in policies CF1 and EN1. All other comments noted.

In response to comments from members of the public a number of amendments were made to the policy and supporting text of the Plan. The amendments are summarised below.

Table 7: Amendments to Plan text made in response to public comments during the pre-submission consultation

POLICY	AMENDMENT
CF1	Reference to children’s play added to sub-clause iii.
EN1	Knapp Wood removed as proposed Local Green Space.
DE1 (HO4)	Policy text in clause 1 slightly amended for clarity.
HE2	Supporting text amended to reference amenity of residents.
ED3	Supporting text amended to include traffic mitigation.

APPENDIX 3 – PRE-SUBMISSION CONSULTATION COMMENTS BY STATUTORY BODIES AND AMENDMENTS MADE TO THE PLAN

Example consultation letter

My Ref: GL/NNP

Your Ref:

Date: 3rd January 2023



NORTHAM TOWN COUNCIL
TOWN HALL, WINDMILL LANE
NORTHAM
DEVON
EX39 1BY

Town Clerk: Mrs Jane Mills MILCM
Telephone and Fax: 01237 474976
e-mail townclerk@northamtowncouncil.gov.uk

Dear Sirs

Re: Northam Neighbourhood Plan Pre-Submission Consultation

To notify you that the Pre-Submission Consultation exercise for the Northam Neighbourhood Plan will be open from 6th January 2023 to 17th February 2023.

The Pre-Submission Consultation document is available to view on the Northam Town Council website (at bit.ly/3GyWkAK, or scan the QR code below), where there is also a link to the online response form.

Hard copies are available to be collected from the Town Hall (at the address above) or at:

- Northam Library, Fore Street, Northam
- Appledore Library, The Quay, Appledore, and
- Summerlands Tackle, Nelson Road, Westward Ho!

Yours faithfully

Guy Langton CILCA, BA(Hons), PGDip, PSLCC.
Deputy Town Clerk, Northam Town Council.
deputytownclerk@northamtowncouncil.gov.uk



Lords of the Manor



The local Council for Appledore, Northam, Orchard Hill and Westward Ho!
Twinned with Mondreville, France and ~~W~~Germany
Office open: Monday to Friday mornings



Trustees of the Common Right

Table 8: Statutory consultees responding with limited specific comments

CONSULTEE	RESPONSE	ACTION TAKEN
The Coal Authority	No comments	Noted
Historic England	No sites allocated in Plan therefore no detailed comments	Noted
Natural England	No specific comments	Noted
NHS Devon Integrated Care Board	Suggested entry on health infrastructure	Noted
National Highways	No specific comments	Noted
Devon and Cornwall Police	No specific comments	Noted

Table 9: Response from the Environment Agency

TOPIC/POLICY	ACTION TAKEN
<p>OBJECTIVES (HOUSING)</p> <p>Sustainable development should be energy and water efficient to the required standard and include renewable energy and water recycling systems’ - Does this mean buildings regulations standard or is the Neighbourhood Plan looking to increase this to 10% beyond building regs as many local and Neighbourhood plans have in line with this option within the Building Regs part G? If so this should be clarified here.</p>	<p>Comment noted.</p>
<p>DE1 (HO4)</p> <p>Part 1. Of HO4 also perhaps needs an ‘and’ at the end of the sentence to tie bullets i-iii to the policy: ‘...and includes design of an environmentally friendly nature and; i includes the use and re-use of traditional materials and low ecological impact materials and techniques; ii is visually attractive as the result of good architecture, effective landscaping, and ...’</p> <p>HO4, 1iii should ideally include wording to require the need to justify any negative impact of a development upon those features (mature trees, Watercourses etc.), not just require the provision of the information on the damage and</p>	<p>Comment noted.</p> <p>Comment noted and policy text amended.</p>

<p>These are 2 discrete areas of policy and issue, we would suggest 2 separate sections, one on Environment and one on Heritage would see them both better and more fully represented in your NP.</p>	
<p>EN1 This policy could better promote not just protection but enhancement and improvement of these areas. This may be possible through offsite Biodiversity</p> <p>Net Gain, but also other initiatives. Their use as spaces which are perhaps multifunctional, being optimised for both people and wildlife should be promoted with good access and habitat and wildlife value.</p>	<p>Comment noted.</p>
<p>EN5 Policy EN5 could benefit from better reflecting the forthcoming Biodiversity Net Gain legislation in the Environment Act and the supporting information for EN5 should reference this. The alteration of EN5 part i to say 'They retain and enhance ...' should be considered please, simply retaining without a minimum 10% enhancement will no longer be an option nationally from the autumn so we suggest that the NP reflect this.</p> <p>We do feel there is a large omission within the Environment and biodiversity section as there is nothing about Green Infrastructure within developments being multifunctional or promoting biodiversity and incorporating sustainable urban drainage schemes.</p> <p>Similarly as an area so close to 2 separate water sources there is no reference to Blue infrastructure (i.e. water and wet features) and either the incorporation of new or protection of existing into sites and development.</p> <p>Features such as rain gardens and the opening up (daylighting) of previously culverted areas can aid with biodiversity, flood</p>	<p>Comment noted and policy text amended.</p> <p>Green infrastructure added to section 5 and defined in glossary.</p> <p>Comment noted</p>

<p>future and considering how the neighbourhood plan could influence how change of use development/new development within CCMA's is addressed.</p> <p>SuDS There is nothing so far about Sustainable drainage systems, as above perhaps look at the Braunton NP which is at a more advanced stage in its development.</p> <p>In addition, policy/policies need to be consistent and supportive of latest shoreline management policies and recommendations relevant to the plan area, including (but not exclusively)</p> <ul style="list-style-type: none"> • Shoreline Management Plan SMP2 Hartland Point to Anchor Head, 2010 and • Any subsequent update which is on-going • Taw Torridge Estuary Coastal Management Study and Pebbleridge Study, 2012 • Taw Torridge Coastal Management Study: Review of erosion adjacent to Northam Burrows landfill and recommendations for remedial action, 2013 <p>These documents should be referenced and can be used to justify related policies.</p>	<p>SuDS referenced in policy EN5.</p> <p>Comments noted.</p>
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Table 10: Response from North Devon AONB Partnership

TOPIC/POLICY	ACTION TAKEN
<p>GENERAL</p> <p>Unfortunately, we were not able to view the Appendices and Maps online, so our comments are confined to comments on the</p>	<p>Comments noted.</p>

<p>Draft Plan itself.</p> <p>In our opinion, it would be of mutual benefit to both AONB Partnership and Northam Town Council to use the AONB name when formulating policies for these areas in their Neighbourhood Plan.</p> <p>Both National and Local Planning Policies recognise the AONB setting as being important.</p>	
<p>SECTION 2</p> <p>Paragraph 2.18 (Text Amend)</p> <p>The Burrows are an extensive common and Country Park, a designated Site of Special Scientific Interest it is an important part of the designated North Devon AONB and part of the UNESCO North Devon Biosphere.</p> <p>It might be worth putting these terms in the Glossary or in another section of the Plan. Whilst many have heard of Northam Burrows Country Park, they may not have heard of terms like:</p> <ul style="list-style-type: none"> • North Devon AONB • Site of Special Scientific Interest • North Devon UNESCO Biosphere 	<p>Comments noted.</p>
<p>SECTION 3</p> <p>Paragraph 3.5 we think you should include the words designated AONB within this paragraph</p>	<p>Comment noted. AONB referenced in Section 8.</p>
<p>OBJECTIVES SECTION</p> <p>Page 10 - We think another objective should be added, namely:</p> <p><i>"Help to conserve and enhance the designated AONB, including its setting which is a nationally protected area"</i></p>	<p>Comment noted.</p>

<p>HOUSING SECTION</p> <p>We think it important that the map illustrates the designated AONB as well as the sites allocated for housing</p> <p>Likewise the Maps on page 20; 21 should show the designated area as this illustrates its relationship to the development boundary. (Note this may be in your Appendices already but we do not have access to this)</p>	<p>Comment noted. The maps have been re-drawn.</p> <p>Comment noted. Plan maps reviewed.</p>
<p>POLICY DE1 (HO4)</p> <p>iii. We would prefer the term undeveloped landscape to 'natural views'.</p>	<p>Comment noted.</p>
<p>ENVIRONMENT AND HERITAGE SECTION</p> <p>It might be useful to have a map of the designated AONB in this section. This might be the section where you put some words about AONB, Biosphere, and SSSI etc.</p>	<p>Comment noted.</p>

Table 11: Response from the Marine Management Organisation

REFERENCE	COMMENT/SUGGESTED AMENDMENT	ACTION TAKEN
GENERAL	We would like to see reference to the South West Marine Plan and the MMO as required under the Marine Coastal and Access Act 2009. In particular, the SW Marine Plan policies can be signposted under:	Comments noted and Plan amended where relevant.
Policy EN4	The landscape and seascape policy SW-SCP-1 aims to manage significant adverse impacts on the seascape and landscape of the south west inshore and offshore marine plan areas.	Comment noted. Relevant text amended.
Policy HE1	The heritage assets policy SW-HER-1 aims to conserve and enhance marine and coastal heritage assets by considering the potential for harm to their significance.	Comment noted. Relevant text amended.
Policy EN5	The biodiversity policies SW-BIO-1,2,3 support proposals that enhance the distribution of priority habitats and priority species, enhance or facilitate native species or habitat adaptation or	Comment noted. Relevant text amended.

	connectivity and that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services.	
Policy ED2	The tourism and recreation policy SW-TR-1 supports proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities.	Comment noted. Relevant text amended.
Policy HE2	The ports, harbours and shipping policy SW-PS-1 supports sustainable port and harbour development in line with the National Policy Statement for Ports.	Comment noted. Relevant text amended.
Policy ED3	The employment policy SW-EMP-1 supports proposals that result in a net increase in marine related employment.	Comment noted. Relevant text amended.

Table 12: Response from Torridge District Council

REFERENCE	COMMENT/SUGGESTED AMENDMENT	ACTION TAKEN
	<p>GENERAL</p> <p>1 Question the need for repetition of objectives in the Neighbourhood Plan.</p> <p>2 Consider a presentation review, to ensure consistency and clarity in each policy area.</p> <p>3 Ensure all maps are appropriately referenced with legends provided.</p> <p>4 There is no need to include policy objectives within the policy.</p> <p>5 Be clear and precise in policy formulation, to enable a decision to be made.</p> <p>6 Issues generated from consultation outcomes/ consultation materials should be presented in the Consultation Statement.</p> <p>7 Ensure a consistent approach to the use of abbreviation and how other documents are referenced, including through footnotes.</p> <p>8 When referencing evidence ensure it is up to date/most recent in respect of relevance. Avoid the use of abbreviations within Policy.</p> <p>9 Avoid duplications of requirements; the Neighbourhood Plan will be read as a whole.</p> <p>10 General review of the document to address</p>	<p>Comments noted and Plan amended where relevant.</p> <p>Point 3 – Plan maps re-drawn.</p>

	<p>typographic or grammatical points and formatting inconsistencies.</p> <p>11 Avoid referencing NDTLP policies in NNP policy.</p>	
1.2	Refer to Northam Town Council (the Town Council) as the subsequent abbreviation.	Comment noted. Text amended where relevant.
1.3	Suggest removal of the "new" given the time period over which neighbourhood plans have been enabled — as referenced in para 1.4.	Comment noted. Text amended where relevant.
1.4 onwards	<p>Consistent reference to the neighbourhood plan - as initially referenced in para 1.4; and</p> <p>Introduce the abbreviation Torridge District Council (the District Council).</p>	Comments noted. Text amended where relevant.
1.4	Suggest removing "revised" — neighbourhood planning is now an established approach in respect of national planning policy.	Comment noted. Text amended where relevant.
1.4	In the next iteration of the neighbourhood plan, update the consultation status and provide clarity on the further stages in plan preparation. Indicate that the submission version of the neighbourhood plan takes account of consultation on the draft document and that following review by Torridge District Council, it will be subject to examination, which if it achieves a positive outcome will be subject to a local referendum ...	Comment noted and text amended.
1.5 1 st sentence	Remove "who"	Text amended.
1.5 2 nd sentence	Suggest rewording: They have explored a range of topic areas including:	Text amended.
2.1/2.15	Clarify population data with regard to date of population - same population different dates.	Text amended.
2.3	Suggest: The neighbourhood plan area extends to the extent of the Civil Parish of Northam; the Qualifying Body for which in respect of neighbourhood planning is Northam Town Council. The extent of the neighbourhood area is defined in Figure 1.	Text amended.
2.5 onwards	No need to capitalise Neighbourhood Plan — the Northam Neighbourhood Plan being referenced as NNP from para 1.2.	Comment noted. Text amended where relevant.
2.6	No need to reference "for the area" - such being provided by the reference to the local development plan.	Text amended.

<p>2.11</p>	<p>Suggest rewording to provide more specific information on the consultation period, and that a range of prescribed consultees were also engaged with to respond the draft neighbourhood plan.</p> <p>The status and access to the Consultation Statement is required to be established — as referenced in the Health Check.</p> <p>Need to add detail with regard to the process — such as: Following pre-submission consultation, which ended on 17th February 2023. All comments received by the Town Council were reviewed and as considered necessary changes were made to the NNP. Following finalisation, the submission NNP will be submitted to Torridge District Council (the District Council). The District Council will then undertake a six-week consultation on the draft NNP. An independent examiner will be appointed to examine the draft NNP to ensure it accords with the "basic conditions".</p> <p>The examination will generally be conducted by means of written representations; oral hearings will not normally be required to ensure a neighbourhood plan is adequately examined. The examiner will issue a report to the District Council and Town Council, which will state if he/she is minded to recommend that the draft Plan should proceed to referendum.</p> <p>The final stage towards achieving a neighbourhood plan is the referendum. The District Council will hold a referendum on the Plan, where all persons entitled to vote in a local election for the area will be entitled to participate. If the majority of those who vote in the referendum are in favour of the draft Plan, the District Council will give the Plan legal force, at which point the Plan would form part of the development plan for the area. With development plan status, the Plan, along with the NDT Local Plan, will be the first consideration in decision making on planning applications in the parish of Northam.</p>	<p>Comments noted. Text amended (in section 4)</p>
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2.12	Ensure listed engagement is in chronological order.	Text amended (in section 4)
2.14/Community	Suggest it would be better to seek protection against loss rather than closure.	Text amended.
Community Profile	<p>Ensure clarity/consistency of references with regard to population information. Source information might additionally be better placed as a footnote.</p> <p>Need to avoid confusion when referring to the three wards and Orchard Hill, contained within Northam.</p>	Comments noted. Text amended where relevant.
Basic Conditions	<p>A Basic Conditions Statement, with demonstrations of how the tests are met should be separately provided.</p> <p>As highlighted in the Health Check a range of documents — the Basic Conditions Statement, SEA screening report, Consultation Statement and Sustainability Appraisal have been stated to have been prepared and provided to accompany the draft neighbourhood plan. I am not aware of the publication of these documents alongside the draft neighbourhood plan, which would have been anticipated from the content of paras 3.10-3.15.</p>	<p>Basic Conditions Statement and Consultation Statement prepared 2022.</p> <p>SEA/HRA screening prepared by Torridge District Council 2022.</p>
3.16	Suggest rephrasing and relocated (as Health Check recommendation 9) — The NNP does not seek to repeat national or local policies, but where appropriate add local detail focussing on identified issues of local importance to achieve its vision and meet the stated objectives.	Comment noted. Text amended.
	Suggest the need to focus on land use matters, which can be appropriately addressed in a neighbourhood plan. Question the continued reference around Assets of Community Value.	Comment noted. Text amended.
5	<p>Question the value of including the map. There reference can be made to the North Devon and Torridge Local Plan. Additionally, the plan used is not contained within the adopted version of the Local Plan.</p> <p>As indicated in the general comment, there should be a clear structure to introduce and justify the proposed policies.</p>	<p>Comment noted. Use and presentation of all maps reviewed.</p> <p>Text amended.</p>
	It is clear that there is an established need for housing in the plan area, and that such is accommodated by planned provision in the North Devon Local Plan, which includes a requirement for affordable housing on qualifying sites. If there	Comment noted.

	<p>is any variance from the Local Plan in respect of requirements, such will need to be clearly justified and be explicitly defined.</p> <p>Question the continuing relevance of 2017-based data; it is recognised that there is an on-going need for affordable housing, which will be addressed through the Local Plan.</p>	<p>Comment noted. Evidence updated. Supporting text and Appendix 2 amended.</p>
Policy HOI	<p>The Local Plan, through reference to evidence establishes the housing mix in respect of bedroom size that is expected from development proposals.</p> <p>The policy is not precise as to what is required and how it is justified. Of note, bedroom size requirements would not necessarily make housing smaller or affordable.</p> <p>If there is a justified position with regard to a housing type, the policy should be precise as to what is required, including any trigger points.</p> <p>It is not clear how a decision taker would apply HOI ii in determining a relevant development proposal.</p>	<p>Comments noted.</p> <p>Supporting text amended. Evidence updated.</p> <p>Comment noted. Policy text amended and clarified.</p>
5.7	<p>Note the latest evidence of housing need, including dwellings by bedroom size is provided in the North Devon Housing and Economic Needs Assessment (May 2016). It is clear from the presented evidence that the majority of houses required, both affordable and market should be in the range of 1-3 bedrooms, which is sought through the application of Local Plan Policy ST 17. The evidence indicates that only 15% of dwellings should be of 4 bedrooms or more.</p> <p>The document can be viewed via as part of the evidence library to the Local Plan reference CE21.</p>	<p>Evidence updated, supporting text, Appendix 2 amended (see comment on HO1 above).</p>
H02	<p>It is not clear how this policy will add to the delivery of affordable housing. The Local Plan is required to be in conformity with national planning policy, which allows for the consideration of viability when determining development proposals. The justifications and how such must be provided are clearly set out in the Local Plan, reflecting national planning policy and guidance.</p> <p>It is not clear how clause ii would be effective in decision making. The value of the use of an</p>	<p>Comments noted and policy text amended.</p>

	<p>overage clause is recognised. However, the proposed approach is not clear as to how such would be triggered and applied. Further question the focus on affordable housing, if the 30% target has been achieved, there would be no opportunity to provide additional affordable housing.</p> <p>Within the framework of national planning policy and guidance the Council seek to achieve the delivery of policy compliant development. Further guidance on this matter in respect of affordable housing is provided in the North Devon and Torridge Affordable Housing SPD.</p>	
H03	<p>Precision is required as to the policy requirements - what will be determined to be sufficient with regard to development types.</p> <p>Question how H03 could be applied, any future extension would be judged at the time of application; a future impact could not be assumed.</p>	Comments noted and policy text amended.
DE1 (H04)	<p>Question the phrasing of "design of an environmentally friendly nature" in respect of how such can be determined.</p> <p>Question the reference to short term and over the lifetime of the development — design quality will be a matter for consideration at the time of decision making, it is not clear what considerations would be alternatively considered over the longer term.</p> <p>The issue of required supporting information is not a matter for inclusion within policy, such will be required through the Council's validation process and as considered necessary for decision making.</p> <p>In respect of H04 2, it may not be practical to provide storage in all dwellings — having regard to the form of the development and criteria ii seems overly prescriptive and again may be problematic to achieve in all dwellings.</p> <p>It is recognised that general storage space should be provided across a development, where practical to do so.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comments noted and policy text amended.</p>

<p>H05</p>	<p>Suggest rephrasing to: Development will be supported which: Delivers net zero carbon dwellings. If referring to "increasing", need to be clear as to from what point the increase will be made. Need to be clear as to what is an alternative energy system. "Consideration" is not appropriate terminology within policy, there should be clarity in the sought outcome; suggest rephrasing to: is sited and orientated to benefit from solar gain.</p> <p>Not necessary to have criteria 2 introduction, if 1 refers to development. Additionally reference to EV charging points is unnecessary. Building regulations require all new homes with associated parking and other uses (which have 10 or more parking spaces) to install EV charging points. It is not appropriate to replicate requirements set out in other legislation.</p> <p>Need be clear as to the scope of enabled development, particularly in respect of wind turbines. Suggest rephrasing: Community scale renewable energy proposals will be supported subject to the avoidance of significant impact on... Suggest the need for clarity as to the form of alternative energy systems. It would be helpful in the supporting text to specify what is meant by community scale and would there be any distinction between community or commercially owned schemes?</p> <p>Suggest rephrasing of criteria 4, removing the purpose within the policy; focusing on what would be required/supported, additionally reorder the text on the basis that new development should be supported by access to sustainable transport options. Note not all enabled new development will have easy access to sustainable transport modes — such as in countryside locations.</p> <p>There is no need to include policy objectives within the policy or the information requirements; such can be provided in the supporting text to the policy.</p>	<p>Comment noted and policy text amended.</p> <p>Comment noted and policy text amended.</p> <p>Comment noted and policy text amended.</p> <p>Comment noted and policy text amended.</p> <p>Comments noted and policy text amended.</p> <p>Comments noted and policy text amended.</p> <p>Comments noted.</p>
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TR1	<p>Question the need for the point below the objective and reference the above comment with regard to electric charging points.</p> <p>The policy would benefit from improved formatting and numbering - to relate to distinct requirements.</p>	<p>Comment noted.</p> <p>Comment noted and policy text amended.</p>
TR1	<p>The supporting text should relate to the policy. The policy intent relates to the provision of car parking spaces, which is extended in the supporting text to the visual impact of such provision. In respect of ensuring a quality design this matter would be separately addressed by design policies in the NNP and NDTLP. Suggest an alternative introduction along the lines of — residential parking provision should be designed to meet the anticipated needs of residents and visitors, which are well integrated and accessible to encourage maximum usage, based on the following minimum levels per dwelling.</p> <p>Suggest the need to reflect requirements that would relate properties of more than 4 dwellings, the 3 space requirements could related to 4+ bedroom dwellings.</p> <p>Consider the following to take account of circumstances where the general requirement cannot be met- development with lower provision may be considered acceptable on areas of high accessibility or where the type of residential development proposed is likely to generate less demand (such as sheltered accommodation and/or town centre locations), with proposed levels of parking unlikely to increase demand for parking in the surrounding area or that sufficient capacity or alternative provision is available (e.g. in public car parks).</p> <p>Clarification is required as to whether cycle storage is to be provided communally or privately. The requirement of one space per bedroom seems excessive. Note the need for consistency with Policy H04 2. The term "preferably" should not be included within policy.</p>	<p>Comment noted and policy text amended.</p> <p>Comment noted and policy text amended.</p> <p>Comments noted and supporting text amended.</p> <p>Comment noted and supporting text amended.</p>

EN1	<p>There needs to be clarity as to the scope and justification for the proposed Local Green Spaces and in seeking designation there should be engagement with landowners.</p> <p>Suggest an adjustment to the introduction to the Policy: Local Green Spaces are defined in the following locations, as defined in... - add map references.</p> <p>As a separate element to the policy, consider a refocus to the second element on the basis that it enables development, which would result in an enhancement of the value that justifies its designation.</p>	Comments noted and policy text amended.
Maps NI	Map references and appropriate information, such as scale, north point, legend should be added. It would be beneficial if the map was provided on a single page.	Map re-drawn.
EN2/EN3	<p>Consider the policy alongside EN1 and EN3. There seems to be some inconsistency as to what will be enabled beyond defined development boundaries.</p> <p>The policy appears to seek an extension of strategic NDTLP policies with regard to the avoidance of coalescence between the 3 settlements. Note the policies of the NDTLP provide significant protections against coalescence, significantly NOR and ST09.</p> <p>The policy would need to be rephrased to be positive in respect of enabling limited forms of development that are considered to be appropriate beyond defined development boundaries, as enabled by the NDTLP, while safeguarding the integrity of the 3 settlements</p>	<p>Comment noted and policy and supporting text amended to clarify consistency of policies.</p> <p>Comment noted. Supporting text amended to clarify point.</p> <p>Comment noted and policy and supporting text amended to clarify this point.</p>
	<p>There is apparent tension between EN2 and EN3 in respect of limitations of/supported development.</p> <p>Map N2 is not provided.</p>	<p>Comment noted. (See points above.)</p> <p>Supporting text corrected.</p> <p>Map N2 relates to Policy EN1.</p>
EN4	Suggest rephrasing to direct policy considerations to the protection of valued views. Environmental protections are established by the NDTLP.	Comments noted and policy text amended

HE1	<p>The policy duplicates the protections/requirements provided by the NDTLP, specifically ST15 and DM07.</p> <p>If the policy is retained suggest rephrasing on the basis of: Development proposals which impact on heritage assets will be supported where... with subsequent revision to policy considerations.</p>	<p>Supporting text amended to show policy focus on issues and sites of local importance.</p> <p>Comments noted and policy text amended</p>
EN5	<p>The first element of the policy replicates provisions in the NDTLP, further the policy should be reconsidered having regard to the requirements that are to be introduced in as part of the Environment Act — further detail is provided in the Health Check. As currently presented biodiversity requirements as set out in the NDTLP and to be introduced by legislation would not be met by the proposed policy.</p> <p>Suggest the scope of how Biodiversity Net Gain could be achieved would be set out in the supporting text — not policy.</p> <p>Question the reference to Devon Biodiversity Record with regard to accessibility of information to all users.</p>	<p>Comment noted and policy text amended.</p> <p>Comment noted and policy text amended.</p> <p>Comment noted.</p>
6.42	<p>This paragraph does not seem to relate to the justification/implementation of Policy ENS.</p>	<p>Comments noted and supporting text amended.</p>
TR2	<p>Suggest a reconsideration of the proposed criteria to avoid duplication within TR2 other neighbourhood plan policies.</p> <p>Need to be clear as to what criteria will be requirements.</p> <p>It is not clear as to how all the elements within li would be achieved, could review on the basis of: at l...will be supported on the following basis:</p> <p>The provision of safe, accessible, and attractive pedestrian and cycle routes, providing permeability through the site and connectivity to the wider community.</p> <p>Clarification as to the need for reference to cycle facilities, having regard to Policy TRI.</p> <p>If "accessible" is referenced in l, there may be no need for iv.</p>	<p>Comments noted and policy text amended.</p>

	<p>Matters addressed by 2 are addressed by Policies within the NDTLP and NNP.</p> <p>Suggest rephrasing: Support will be provided to the creation of a traffic separated pedestrian and cycle route leading from Heywood Road... it would be useful to have a mapped indication of the potential route.</p>	
EDI	<p>The policy provisions other than the reference to the Appledore Marine Enterprise Zone are provided for through NDTLP ST11, DM13 and in relation to amenity DMOI.</p> <p>Note again, the need to avoid tension across the Neighbourhood Plan in respect of policies that seek to protect the rural area/undeveloped coast beyond defined development boundaries and the limitations/opportunities that are provided through the strategic policies of the NDTLP.</p>	<p>Comment noted.</p> <p>Comment noted and policy and supporting text amended to clarify consistency of policies.</p>
TR3	<p>Note the scope of the policy relates to public and private parking provision.</p> <p>i. - Suggest rephrasing to relate to restricting the loss of parking capacity unless the need for such is no longer demonstrated.</p> <p>ii. — suggest rephrasing: need to have clarity as to the acceptability of additional parking provision, does it include extensions to existing car parks on only brownfield sites, any brownfield site, or extensions irrespective of greenfield/brownfield status?</p> <p>iii. — note that on street parking does not come under the authority of the local planning authority, such is a matter for the highway authority.</p> <p>iv. — clarification is required as to the intent of this criteria, of note planning permission is not necessarily required to convert privately owned parking provision. It is recognised that the conversion of garage space may result in additional use of on-street parking.</p>	<p>Comment noted and policy text amended.</p> <p>Comment noted. Policy text clause deleted. Supporting text amended.</p> <p>Comment noted and policy text amended.</p> <p>Comment noted and policy text amended.</p>

ED2	<p>Question the need for this policy. Support for appropriately located new tourism development, improvement to and expansion of accommodation and facilities are provided in the NDTLP, Policies DM17 and DM18.</p> <p>The proposed NNP does not appear to vary from NDTLP policy requirements/ safeguards.</p>	<p>Comments noted. Supporting text amended to clarify area-specific detail and policy focus on issues of local importance.</p>
HE2	<p>Note, the area subject to the proposal should be defined on a policies map and review the policy numbering.</p> <p>Suggest rephrasing to add clarity on the basis of: Redevelopment of Richmond Dock, as defined on Policies Map X, will be supported for maritime related or small business use, subject to: the integrity of the structure and setting is retained; and the dry dock remains capable of its original use.</p> <p>Suggest current ii would be secured by Policy HE1 if retained or NDTLP policy.</p>	<p>Comment noted.</p> <p>Comment noted and policy text amended.</p> <p>Comment noted. HE1 not applicable to this site.</p>
ED3	<p>Question the need for this policy. The NDTLP seeks to protect sites in economic use (DM13) and Policy NOR refers specifically to Appledore Shipyard in this respect</p>	<p>Comment noted. Supporting text shows policy focus on issues of local importance supported by local-specific detail.</p>
Glossary	<p>Brownfield Land — refer to the NPPF definition of Previously Developed Land. Economic Development — suggest the need to define business activity; reference NDTLP definition of economic development.</p>	<p>Comment noted. Glossary amended.</p>

APPENDIX 4 – RECOMMENDATIONS IN FINAL HEALTH CHECK REPORT AND AMENDMENTS MADE TO THE PLAN

Table 13: General Recommendations and Modifications Made

	General Recommendation	Notes	Modification to Plan
1	Consider the proposed modification of the policies.		Recommendation accepted. Policy modifications accepted as set out in Table 14.
2	Consider including the list of community assets in policy CF1.		Recommendation accepted.
3	Consider the implications of the NPPF 2024 in particular paragraphs 69,70 and 74.	NPPF paragraphs refer to the allocation of small and medium-sized housing sites. In conformity to national policy, in 2018 Northam Town Council issued a call for sites for potential housing allocation through the Plan. Six sites were considered but discounted due to potential conflict with emerging strategic policies of the NDAT Local Plan. Shortly after its conclusion, this process was superseded by the adoption of the NDAT Local Plan, which contained a full set of housing allocations based on an assessment of local housing needs. Northam Town Council has made no further call for sites.	Recommendation accepted. Section 7 of the Plan, the Record of Community Engagement and Consultation Statement amended to document this process.

Table 14: Policy Recommendations and Modifications Made

POLICY	RECOMMENDATION	MODIFICATION
CF1	None	-
HO1	None	-
HO2	Re-write proposed with clause 2 removed because viability assessments outside scope of neighbourhood	Recommendation accepted and policy modified.

	planning.	
HO3	None	-
TR1	Re-write proposed with 2 ii) removed and policy on parking provision made more flexible to conform to Local Plan policy DM06.	Recommendation accepted and policy modified.
	Separate HO4 and HO5 from housing policies because they deal with non-residential development	Recommendation accepted. By agreement with health check examiner HO4 and HO5 given new references (DE1 and DE2) and moved to new sub-section.
DE1 (HO4)	Re-write proposed as a general development design policy with addition of clauses 1 and 2 from HO5.	Recommendation accepted and policy modified.
DE2 (HO5)	Re-write proposed as renewable energy policy with loss of clauses 1 and 2 to HO4.	Recommendation accepted and policy modified.
EN1	Three sports and recreation sites more appropriately protected under NPPF paras 102 and 103 – these sites moved to new supplementary policy EN1a). One other site removed from policy. Policy amended to clarify conformity to NPPF.	Recommendation accepted and policy modified.
EN1a)	New supplementary open space and recreation policy for three sports and recreation sites from EN1.	Recommendation accepted and policy added to Plan.
EN2	New policy text on protecting the identity of settlements proposed as clause 1 in amended EN3.	Recommendation accepted. Recommended clause 1 in EN3 retained as policy EN2 because clause 1 relates to a different NDAT Local Plan strategic policy and a separate set of planning considerations to EN3.
EN3	New policy text on protecting the identity of settlements proposed as first clause Remainder of policy text amended for clarity, and dark skies provision moved to new supplementary policy EN3a). Addition of new text on protecting identity of settlements as noted above.	Recommendation accepted and policy modified. As noted above, recommended clause 1 retained as separate policy EN2.
EN3a)	New supplementary dark skies policy with provisions on lighting required and protection for valued views in EN4.	Recommendation accepted and policy added to Plan.

EN4	None	-
HE1	Policy modified to ensure conformity to NPPF protections for heritage assets.	Recommendation accepted and policy modified with additional clause 1 on protections for locally listed non-designated heritage assets under NPPF. Health Check examiner makes no objection to additional clause 1 because policy text 'remains substantially the same'.
EN5	Minor modification for clarity.	Recommendation accepted and policy modified.
TR2	None	-
ED1	None	-
TR3	None	-
ED2	None	-
HE2	None	-
ED3	None	-

