



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

To: All Members of the Neighbourhood Plan  
Advisory Group  
Cc: All Northam Town Councillors

Town Clerk: Mrs Jane Mills MILCM  
Telephone and Fax: 01237 474976  
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**You are hereby summoned to attend a Neighbourhood Plan Advisory Group Meeting on Thursday 14<sup>th</sup> July 2022 at 6.30pm, to be held on Zoom.**

**Topic: NNP Advisory Group**  
**Time: Jul 14, 2022 06:30 PM London**

**Join Zoom Meeting**

**<https://us02web.zoom.us/j/85985715448?pwd=d1Fla2NHbVg1VE9GV29vSTk2OWR1QT09>**

**Meeting ID: 859 8571 5448**  
**Passcode: 712254**

*M. J. Mills*

Mrs Jane Mills Fd Community Governance MILCM, PSLCC  
Town Clerk

Date of issue: **8<sup>th</sup> July 2022**

The following are members of the Neighbourhood Plan Advisory Group:

Councillors Hames, Sargent, Mrs Hodson, and Miss Woodhouse, plus the Mayor ex-officio.  
(Two vacancies, one each for a Northam Ward and Appledore Ward elected member).

Non-Councillors: Mr G Allen, Ms Bartleman, Ms J Smart.

All elected Members of the Council are entitled to attend.



Lords of the Manor



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



Trustees of the Common Right

## AGENDA

- 1 Apologies**
- 2 Chairman's Announcements**
- 3 To agree the agenda as published**
- 4 Declarations of interest:**  
*Members are reminded that all interests should be declared prior to the item being discussed.*
- 5 To confirm and sign the minutes of the Planning Meeting held 16<sup>th</sup> June 2022**  
*(herewith)*
- 6 Public Participation**  
*Members of the public are permitted to make representations, answer questions and give evidence in respect of any item of business included in the agenda. Each member of the public is entitled to speak once only in respect of business itemised on the agenda and shall not speak for more than 4 minutes. The period of time which is designated for public participation in accordance with standing orders shall not exceed 20 minutes.*
- 7 To consider Action Points (herewith)**
- 8 To consider feedback and recommendations from the Working Group regarding the incorporation of the feedback from:**
  - i. Torridge District Council Officers.**
  - ii. Members of the Public.**
  - iii. The working group regarding the community profile.**

**Northam Town Council – Minutes of the Northam Neighbourhood Plan Advisory Group Meeting held by Zoom on Thursday 16<sup>th</sup> June 2022**

**Present:** Cllrs Hames (Chairman), Mrs Hodson, Laws, Sargent.  
Non-Councillor Members: Mrs E Bartleman and Mrs J Smart.

**In attendance:** Cllr C Leather – non-group member.  
Mr G Langton – Deputy Town Clerk.  
One member of the public.

- 2206/104 Election of the Chairman of the Neighbourhood Plan Advisory Group.**  
It was proposed by Cllr Laws and seconded by Mrs J Smart, that Cllr Hames be elected as Chairman, all were in favour and it was so resolved.
- 2206/105 Election of the Vice Chairman of the Neighbourhood Plan Advisory Group.**  
It was proposed by Cllr Laws and seconded by Cllr Hames that Cllr Sargent be elected as Vice Chairman, all were in favour and it was so resolved.
- 2206/106 Apologies**  
Apologies were received from Cllr Woodhouse and Mr G Allen.
- 2206/107 Chairman's announcements**  
The Chairman made no announcements.
- 2206/108 Declarations of interest:**  
*Members were reminded that all interests should be declared prior to the item being discussed.*
- 2206/109 To agree the agenda as published**  
It was **resolved** to agree the agenda as published.  
Proposed: Cllr Laws, Seconded Cllr Sargent (all in favour)
- 2206/110 To confirm and sign the minutes of the meeting held 26<sup>th</sup> April 2022**  
It was **resolved** to confirm the minutes of the meeting held 26<sup>th</sup> April 2022, deleting the repeated phrase at minute 2204/1326.  
They would be signed at a later date.  
Proposed: Cllr Laws, Seconded: Cllr Sargent (all in favour).
- 2206/111 Public Participation**  
*It was announced that members of the public were permitted to make representations, answer questions and give evidence in respect of any item of business included in the agenda. Each member of the public would be entitled to speak once only in respect of business itemised on the agenda and should not speak for more than 4 minutes. The period of time which is designated for public participation in accordance with standing orders shall not exceed 20 minutes.*
- The member of the public addressed the Group regarding the feedback received from officers at Torridge District Council and the submitted amendments to policy EN2 – PREVENTION OF COALESCENCE. He went on to draft a summary of the consultation exercises undertaken thus far and a draft Community Engagement document for consideration by the Group.
- The Chairman thanked him for and accepted his offer.
- 2206/112 To consider the action points.**  
The action points were noted.

**2206/113 To consider feedback from Torridge District Council Officers.**  
 The Group discussed the approach to a detailed review of the feedback.  
 It was **resolved** to delegate the review to the established working group of Cllrs Hames, Sargent and Hodson, supported by the Deputy Town Clerk, to report its progress to the next meeting of this Group.  
 Proposed: Cllr Hames, Seconded: Cllr Smart (all in favour).  
**Action point: Deputy Town Clerk to arrange the working group meeting.**

**2206/114 To consider the submissions from a member of the public regarding the wording of paragraph 6.12 of policy EN2 - prevention of coalescence.**  
 The Group discussed the approach to the incorporation of the suggested amendments.  
 It was **resolved** to delegate the review of the suggested wording to the established working group of Cllrs Hames, Sargent and Hodson, supported by the Deputy Town Clerk, to report its progress to the next meeting of this Group.  
 Proposed: Cllr Hames, Seconded: J Smart (all in favour).

**2206/115 To consider the draft Community Profile.**  
 The Group discussed the approach to reviewing the draft.  
 Cllr Mrs Hodson noted that there were some factual errors, specifically regarding the number of schools within in the parish, recording three rather than two as in the draft.  
 J Smart noted that data on the numbers of holiday lets/second homes would be helpful both in this section and to evidence policies within the Neighbourhood Plan.  
**Action point: Deputy Town Clerk to contact the relevant Officer at Torridge District Council.**  
 It was **resolved** to delegate the review to the established working group of Cllrs Hames, Sargent and Hodson, supported by the Deputy Town Clerk, to report its progress to the next meeting of this Group.  
 Proposed: Cllr Mrs Hodson, Seconded: Cllr Laws (all in favour).

**2206/116 To receive feedback as shared with members of the Group on the Sharepoint site.**  
 The feedback was received. It was considered that a further consultation would be needed to ensure the views of the community were as current as possible. The approach for this would be considered in detail at a future meeting.

There being no further business the meeting closed at 7.30pm

Signed ..... Dated.....

## Northam Neighbourhood Plan Advisory Group - Action Points

### Arising from April 2022:

37. Cllr Hodson to draft the Statement of Community Engagement.	In progress	ongoing
38. Cllr Hames to draft the Basic Conditions Statement	In progress	ongoing
39. All members to review the feedback evidence as posted on the SharePoint site.	On the agenda	ongoing
42. Subgroup to draft specific questions and points for clarification by Torridge District Council Officers.	Questions passed to TDC Officers. Meeting arranged for 4 <sup>th</sup> May to receive feedback.  Request made for Officers to attend a future meeting of this Group to present feedback.	Completed prior to the previous meeting.
47. Cllr Hames to share any available information relating to previous feedback sessions via the Deputy Town Clerk.	The Deputy Town Clerk is awaiting the documents	ongoing
48. Deputy Town Clerk to share information relating to previous feedback sessions provided by Mr Arnold.	Shared as email accompanying the circulation of this agenda pack.	complete
49. Working Group to meet to consider the detail of the feedback from TDC Officers and members of the public regarding policy EN2	Arranged and outcome on agenda.	Complete
50. Deputy Town Clerk to seek up to date figures for 2 <sup>nd</sup> and holiday lets in Northam. <i>TDC only hold data parish-wide and are limited to actual declared numbers, but I have been informed that: Northam Parish has 6774 properties. Of those: 441 are second homes, registered with TDC council tax office ... 6.5% 374 domestic properties are registered with business rates as ... 5.5% The total number of domestic properties that are formally declared as 2<sup>nd</sup> homes or holiday lets is 815 ... 12%.</i>	Detail shared as below.	Complete

## **Annotations from working group on this and TDC's feedback. (annotations in green)**

Briefing document v2

Proposed Alterations to NNP as a result of TDC Comments 6.22

Document history

Document drafted 19.6.22

Documented updated with comments 20.6.22

General points: TDC are concerned at overlap where NNP policies say same things as ND&TLP. Since the NNP policies need to generally conform to and not undermine ND&TLP this is inevitable. It is however important to try and minimise this and for supporting text to explain clearly why each NNP policy is necessary in local terms and how it focuses and adapts the ND&TLP equivalent policies.

TDC appear not to have read the appendices of the NNP (they are not in version 2.8 of the Plan) this means they were not aware of the specific criteria for sites in policies EN1, HE1, EN4, EN5.

NNP should have a Glossary - this will be quite small but definitely include the following: dark skies, amenity - reason for suggestion to enable clarity and meet TDC suggestions.

Remove conformity notes below all policies - reason for suggestion to meet TDC comment.

Policy CF1 Community Facilities

### **POLICY: CF1 COMMUNITY FACILITIES**

- i. Community Facilities should be protected from loss through the planning process where there is evidence of ongoing demand and community value. The Town Council may seek their listing as Assets of Community Value where necessary and appropriate.**
- ii. Development proposals that increase the availability of open spaces for sport and recreation purposes will be supported, subject to policies on the protection of Green Spaces and Coalescence (see tourism).**
- iii. Development proposals will be supported which add new, or enhance current provision of facilities.**

**Conformity: ST11 ST22 NOR NOR6 NOR7 NPPF83 NPPF91 NPPF96-97**

Clause i - suggest rewording first sentence of clause i to sound more like ST22 - reason for suggestion ST22 is the relevant Local Plan policy.

Suggest wording for clause i as follows:

i Development proposals will be supported where is no loss of community facilities for which there is evidence of on-going demand and community value.

Suggest cutting second sentence of clause i - reason for suggestion - word 'may' is too vague and listing as asset of community value is not relevant for planning policy text.

**The working group were in favour of the suggested amendments.**

**POLICY: HO1 SIZE OF DWELLINGS**

- i. The provision of smaller dwellings (those with one, two or three bedrooms) will be supported, with particular emphasis on the provision of more bungalows. (Rooms otherwise designated on plans, but clearly capable of use as bedrooms, will be counted as bedrooms for the purposes of this policy)**
- ii. Dwellings of 5 bedrooms or more will, exceptionally, be allowed where evidence is provided that this is needed to provide the main residence of a household with a minimum fifteen-year residency in the area.**
- iii. New dwellings should be designed to be flexible, adaptable and accessible in order to cater for the changing needs of a typical household.**
- iv. All new homes will be required to meet the Lifetime Homes standard.**

**Conformity: ST01 ST02 ST18 DM22 NPPF5 NPPF12**

**GENERAL SUGGESTION**

Consider cutting policy altogether to save time and work.

If you want to keep policy, the policy needs to be researched to identify robust up-to-date supporting evidence.

The Northam Housing needs survey is 7 years old - need for new evidence

The Local Plan housing needs survey is not specific to Northam and also old.

NNP may need a professional housing needs survey - this will cost money.

Also check out the Strategic Housing Market Assessment (SHMA) in the examination library of the Local Plan - how useful is it as evidence for Northam?

If you want to retain policy HO1:

Remove Clause ii) reason for suggestion - how administered and policed? Is it even legal?

Remove Clause iv) reason for suggestion - standards will change over lifetime of NNP.

**The working group were in favour of the suggested amendments.**

**POLICY: HO2 VIABILITY ASSESSMENTS FOR AFFORDABLE HOUSING**

- i. Proposals for residential housing development will be supported where they conform to NDAT Local Plan ST18 and deliver the level of affordable housing stated in that policy.**
- ii. Provided they comply with all other relevant NNP policies, proposals brought forward by Community Land Trusts or Community-led initiatives or self-build projects will be supported for the re-use for affordable housing of empty or derelict buildings, infill plots and new builds within development boundaries. The tenure mix of such developments is expected to reflect local needs.**
- iii. Viability assessments that make affordable housing levels subject to returns expected by developers will only be accepted:**
  - (a) If conducted on the basis of an 'open book' financial appraisal open to public scrutiny, including the developer's justification for the expected level of return;**
  - (b) If the benchmark land value is the existing use value of land plus a reasonable premium based on the circumstances applicable to the development.**
  - (c) If the return provided for in the viability assessment is exceeded, then an additional financial contribution towards affordable housing shall be paid to the LPA in accordance with a formula set out in a developer obligation attached to the planning permission.**

**Conformity: NPPF 2019 para 57, 62-64; NDAT ST18: *Affordable Housing on Development Sites***

GENERAL COMMENT ON HO2: There is need for this policy to be retained in NNP because Local Plan unable to deliver targets for affordable housing because of questionable viability assessments by developers.

Re-title HO2 Viability Assessments - reason for suggestion because without clauses i and ii policy is about Viability Assessments

Remove Clause i - reason for suggestion because this is supporting text.

Remove Clause ii - reason for suggestion because this is supporting text.

**The working group were in favour of the suggested amendments.**

**POLICY: HO3 NEW, REDEVELOPED AND REPLACEMENT DWELLINGS**

- i. Adequate amenity space should be provided to meet the needs of intending occupiers and allow for movement space.**
- ii. Where development abuts the private garden areas of existing properties, a separation distance greater than 20m will be required to minimise overlooking, with a minimum of 10m between the rear of new houses and the common boundary unless the design of the proposal affords equivalent protection. Enhanced separation distances may be necessary for development on sloping sites.**
- iii. Development layout should ensure that sufficient space is provided between dwellings and existing trees to be retained to prevent possible overshadowing. New tree planting close to buildings should be deciduous to allow access for sunlight and daylight during the winter.**
- iv. If a dwelling is being designed to be adaptable overtime to meet changing needs, then the impact of such future extension should be taken into account in its orientation, plot size and relationship to other properties.**
- v. An increase in height over any replaced building will only be acceptable where this is compatible with the appearance of adjacent buildings and the amenity of their occupiers.**

**Conformity: ST01 ST04 ST15 NOR DM01 DM04 DM07 NPPF61**

**NPPF124 NPPF127 NPPF128 NPPF130**

Re-title Policy HO3 Residential Design and Amenity - reason for suggestion - the proposed title better describes what policy is about.

Add word 'amenity' to proposed NNP glossary - reason for suggestion to aid clarity.

Identify evidence - what are national standards for amenity space (i) and gaps between housing to avoid overlooking (ii) and (iii)? Reason for suggestion - lack of evidence will fail policy at examination.

Cite evidence is supporting text.

If no evidence suggest cutting clauses i, ii, iii.

Clauses iv and v are OK and can be retained.

**The working group were in favour of the suggested amendments.**

**POLICY: HO4 QUALITY OF DESIGN OF RESIDENTIAL PROPERTIES**

All development within the NDP area must be of a high standard, reflect local character and context, and create a strong sense of place.

- i. **Proposals must include supporting information which clearly demonstrates how existing key features and assets of the site such as biodiversity, natural views, built structures, landmarks including mature trees, water courses and hedges are impacted by the proposal. Any negative impact on these features must be accompanied by appropriate mitigation measures.**
- ii. **The use and re-use of traditional materials, with the use of low ecological impact materials and techniques will be sought.**
- iii. **Proposals will be expected to be visually attractive as the result of good architecture, layout and appropriate effective landscaping, and function well adding to the overall quality of the area, not just for the short term, but also over the lifetime of the development.**
- iv. **Suitable provision for general storage space should be provided in all dwellings. Externally accessible space should be provided for storing garden equipment and tools, as well as play equipment and bicycles.**
- v. **Refuse storage space should be externally accessible from the front of the house. The refuse storage space should be accessible from the kitchen without having to go through a living room.**

**Conformity: ST04 ST14 DM04 NPPF124 NPPF125 NPPF127 NPPF130 ST05**

Supporting text needs to make clear policy about all text not just housing. Reason for suggestion - this policy is an HO policy thereby giving the impression it is just about housing.

Clauses iv and v need to be renumbered 2 i and 2 ii, text should make clear that 2 refers specifically to housing - reason for suggestion to ensure that housing is not muddled up with commercial and other development.

**The working group were in favour of the suggested amendments but noted that more detail may be required regarding flats/apartments.**

## **POLICY: H05 ENERGY CONSERVATION AND CARBON REDUCTION**

**1. New residential development or improvement to existing dwellings will be supported where:**

- a) It incorporates increased energy efficiency measures with the aim of increasing the number of zero carbon dwellings;**
- b) It incorporates alternative energy systems, such as solar panels, micro-wind generation, heat pumps, and the introduction of grey water storage or such new technologies that become available; and**
- c) in the case of new dwellings, in order to promote energy efficiency, consideration is given to the orientation of dwellings in order that living rooms can benefit from passive solar gain.**

**2. Development of new dwellings and other buildings will be supported where:**

- a) Electric car charging points are incorporated where appropriate; and**
- b) Rainwater harvesting and grey water recycling systems are incorporated where appropriate.**

**3. Proposals for community scale alternative energy systems will be supported where there is no adverse impact on residential amenity, landscape setting or biodiversity. Proposals should be accompanied by an independent assessment of their siting, scale and setting in the landscape and impact on biodiversity.**

### **Conformity: ST02 ST05 St16 NPPF 151-154**

In clause 1 remove reference to existing development - reason for suggestion - policy can only apply to new housing developments.

1 a) Consider removing clause as it's probably in building regs. If retain remove text about the aim - reason for suggestion - aims are not policy text.

1 b) Remove 'such as and then examples' - reason for suggestion the listing of examples does not belong in policy text.

2 a) Remove clause - reason for suggestion - this is in new building regs.

2 b) Suggest retain 2 b) but remove phrase 'where appropriate' - reason for suggestion - if these measures were deemed not appropriate they could be discussed at application stage.

3 Retain this clause despite TDC suggestion that it rules out some types of generation - reason for suggestion - this clause is fine as it is and any proposal will be subject to normal planning process.

**The working group were in favour of the suggested amendments.**

**POLICY: TR1 RESIDENTIAL PARKING PROVISION**

- i. New dwellings must provide off-street spaces as follows: 1 bedroom dwellings – 1 space per dwelling  
2 bedroom dwellings – 2 spaces per dwelling 3 bedroom dwellings – 2 spaces per dwelling 4 bedroom dwellings – 3 spaces per dwelling  
Houses in multiple occupation – 1 space per 2 bed spaces.**
- ii. A suitable number of spaces for the purpose of drop-offs should be provided.**
- iii. The need for more spaces will be based on the views of the Highway Authority.**
- iv. Proposals for apartments providing communal provision will be assessed separately in consultation with the Highway Authority.**
- v. Housing developments of four or more dwelling units will be required to provide one further off-street parking space per four dwelling units.**
- vi. Provision of publicly accessible and private electric vehicle charging points within the curtilage of the development will be supported.**
- vii. All housing developments should incorporate secure and accessible cycle parking, preferably covered from the weather, and providing one space per bedroom for each dwelling and one space per five dwellings for visitor bicycles.**

**Conformity: DM06 NPPF105 NPPF106**

GENERAL POINT - this policy needs to be re-researched for evidence. Check national standards for parking places per house. Check the Torrington NP plan policy cited by TDC for evidence. Cite the evidence in the supporting text of this policy. Reason for suggestion - lack of evidence could fail this policy at examination.

If no evidence can be found to support policy consider removing it from NNP.

If you are retaining policy TR1:

In clause i remove repeated phrase 'per dwelling' - reason for suggestion - TDC are right the phrase does not need to be repeated.

Clause ii - quantify what a suitable number is and cite evidence for this number. If you can't do this suggest cutting clause - reason for suggestion - suitable at present is imprecise and not supported by evidence.

Clause iv - consider cutting this clause - reason for suggestion - it doesn't seem to do very much.

TDC suggest borrowing a clause from the Torrington NP about areas where lower provision for parking may be acceptable. We suggest using this clause in the supporting text. Reason for suggestion - putting it in policy text makes the text unwieldy. It also gives developers a get-out clause for not providing enough parking spaces.

**The working group were in favour of the suggested amendments.**

Policy H07

**POLICY: H07 RESIDENTIAL CARE AND NURSING HOMES**

**Proposals for Residential Care and Nursing Homes will be supported where:**

- i. The site lies within the development boundary and is well related to the public transport service and within reasonable walking distance of services.**
- ii. The accommodation includes a dedicated outdoor amenity space for the exclusive use of residents.**
- iii. Adequate on-site parking provision is provided for staff and visitors.**

**Conformity: NDA Local Plan ST01 ST02 ST04 ST05 ST06 ST17 DM01 NPPF8**

GENERAL POINT: TDC suggest that this policy is duplicated in Local Plan. We are unable to find any policy that does this. You may wish to query with TDC where Local Plan policies duplicate H07. Unless TDC can show this, we think it is fine to retain H07 as it is.

Alter numbering H07 to H06 - reason for suggestion - there is no H06 in the NNP.

**The working group were in favour of removing the whole policy, the matter being sufficiently well covered by the Local Plan 2031.  
Detail of the points would need to be included in a future draft of the Plan.**

Policy EN1

**POLICY: EN1 LOCAL GREEN SPACES**

The following locations (see Map B1) are designated as Local Green Spaces and potential Assets of Community Value (ref section & policy on community facilities). Development that does not enhance the value of these areas as Local Green Spaces will not be supported unless exceptional circumstances apply, for example, it is essential to meet specific necessary infrastructure needs and no alternative site is available.

- i. Rectory Gardens, Fore Street, Northam
- ii. Allotments South of Marshford, Churchill Way, Northam
- iii. Land known as Blackies, Torridge Road, Appledore
- iv. The Cricket Ground, Golf Links Road, Westward Ho!
- v. Humpty-Dumpty Field, Great Burrow Rise, Westward Ho!
- vi. Westward Ho! Park, Golf Links Road, Westward Ho! (owned by NTC)
- vii. Escarpment Woodland between Bay View Road and Atlantic Way
- viii. **Anchor Park, Appledore (owned by NTC)**
- ix. Village Green, The Backfield, Appledore
- x. Hillcliff Gardens, Irsha Street, Appledore
- xi. Tors View, off Cornborough Drive, Westward Ho!
- xii. The village green, Westward Ho!
- xiii. Appledore Football Club Ground, Churchill Way
- xiv. Bideford Blues Junior FC Sports Complex

**Conformity NPPF 99-101 DM09: *Safeguarding Green Infrastructure***

Remove photos and references to Knapp Wood and Burrough Farm - reason for suggestion - they were never agreed by group to be LGS candidates. In addition Knapp Wood is not publicly accessible and therefore does not meet criteria for LGS.

**The working group considered that the criteria were met**

**<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>**

Re-word policy as follows:

**1 The following locations are designated as Local Green Spaces and potential Assets of Community Value:**

**(list of LGS sites as current text)**

**2 Development that does not enhance the value of these areas as Local Green Spaces will not be supported unless exceptional circumstances apply, for example, it is essential to meet specific necessary infrastructure needs and no alternative site is available.**

Reason for suggested rewording - clarity.

General point: there is no need to take up TDC's suggestion that clause 2 spells out what development will be supported in the LGS sites as clause 2 does this already.

General point: Re: TDC comment no consultation yet with landowners as this is not due until statutory consultation period.

**Other than the note above, the working group were in favour of the suggested amendments.**

## Policy EN2

### **POLICY: EN2 PREVENTION OF COALESCENCE**

**Development that would lead to or contribute to coalescence between the development boundaries of Northam, Appledore and Westward Ho! as defined on Map B2, will be refused to ensure the distinct identities of the respective settlements are maintained.**

**Conformity: NDA Local Plan ST09 DM08(a) NOR(h) NPPF 170, 180**

General point: we think it is necessary to retain EN2 for the following reasons - although NOR h) does a similar job EN2 is better focussed because it covers the entire gap between Appledore and Northam/Westward Ho! In addition it makes it clear in supporting text 6.12 (proposed) what coalescence means in this area.

General point: It would be a good idea to add 'coalescence' to the proposed NNP glossary.

Supporting text para 6.14 should be re-numbered 6.13 and appear where 6.13 is now. Para 6.13 should be re-numbered and incorporated into the supporting text to EN3. Reason for suggestion - 6.14 refers to EN2 and 6.13 refers to EN3.

The supporting text should be altered as TDC suggest. In addition supporting text should note that the development boundaries of Northam and Westward Ho! are conjoined.

## Policy EN3

### **POLICY: EN3 PROTECTING RURAL AND LANDSCAPE CHARACTER**

**Within the area shown on Map B2 new development will be supported provided that:**

- i. The development does not detract from the un-spoilt character, rural atmosphere and appearance, dark skies and tranquillity of the area.**
- ii. Any development should conserve, restore or add traditional earth banks or hedgerows as boundaries, with the use of native broadleaf tree and hedgerow species, to integrate the development with the rural character of the area.**
- iii. Development does not harm the setting of Northam Burrows or the South West Coastal Footpath.**
- iv. There is safe convenient access to the development by foot, bicycle, vehicle and public transport.**
- v. That development is required because it cannot reasonably be located outside the area defined on Map B2.**

**Conformity: NDA Local Plan ST09 ST14 DM08a DM18 NOR(h) NPPF 170 180**

General point: we need to retain EN3 to maintain the character of the gap between settlements. At present ST09 clause 7 (Development in the within the Undeveloped Coast and Estuary) is under pressure from developers who maintain wrongly that it is a landscape character policy and therefore can be argued away by LVA surveys that suggest limited landscape value or that their development will not harm the landscape value.

Para 6.15 should be rewritten to remove any suggestion that this is a policy about landscape character. Para 6.15 should state that Policy EN3 is a spatial strategy aimed at protecting and enhancing the distinctive environment and cultural heritage of the coastal and estuarine zone as set out in para 4.39 of the ND&TLP.

Text should say that Policy EN3 aims to retain the unspoilt and rural character of the area defined in map B2 which forms part of Unspoilt, Undeveloped Coastal and Estuarine Zone as defined by

Local Plan policy ST09. Reason for suggestion - to prevent developers claiming EN3 is a landscape character policy.

Supporting text should explain ST09 but then make it clear that EN3 focuses on needs and unique character of area between Appledore and Northam/Westward Ho! Unlike ST09, EN3 protects dark skies and it also protects setting of SW Coastal Footpath and Burrows. Also unlike ST09, EN3 protects traditional rural boundary forms - reason for suggestion to answer TDC point that ST09 does the same job as EN3.

Supporting text should clarify meaning the 'area' in policy text. Text should explain the area includes the site itself and any adjacent land from which the site can be experienced. Reason for suggestion: area is not defined in policy or in ST09. By defining area in this way the decision maker is given a clearly definable area to assess the impact of proposals.

Supporting text should make clear that the area does not include any adjacent developed land. reason for alteration - to prevent developers claiming that developed land on one or more boundary of a site reduces its unspoilt character (this is what they are currently doing in the Pitt Hill Fields application and the Torridge Road application).

Alter policy text clause i to remove words 'rural atmosphere'. reason for suggestion - 'atmosphere' hard to measure objectively. It is not a planning term.

**The working group were in favour of the suggested amendments.**

**POLICY: EN4 PROTECTING VALUED VIEWS**

Development will be supported where it sits well in the environment, does not harm the identified on Map B3 and detailed in Appendix 2 with the photo-vistas attached.

Development proposals that have a significant visual impact on the open landscape in terms of height, massing and scale of buildings, must provide a landscape impact appraisal, undertaken by the applicant.

These viewpoints are:

- i. Pimpley Bridge, Northam Burrows looking North East to Staddon Hill, Appledore and East towards Northam/Westward Ho!.
- ii. Bone Hill, Northam looking North and North West towards Appledore.
- iii. Bidna Hill looking East and South East along the South West Coastal Footpath.
- iv. Lookout Field, Staddon Hill, Appledore looking South West towards Westward Ho!.
- v. Windmill Lane, Northam, from the field access looking North and North East in the direction of the ridge extending from Bidna to Diddywell.
- vi. Village Green, Backfield, Appledore, looking North towards Blackies Wood.
- vii. Staddon Road, Appledore, looking South West towards Long Lane and Northam Burrows.

**Conformity: NDAT Local Plan ST09 ST14 ST15 NOR(1) NPPF 127 170**

General point: EN4 should be retained as Local Plan has no valued views policy for Northam.

General point: We do not think TDC have seen the appendix with the photos of the views or the explanation why each view is in the policy.

Remove second para of policy text: reason for suggestion - to meet TDC suggestion.

**The working group were in favour of the suggested amendments.**

**Note: The working Group arranged a second meeting, then delayed by sickness and other absences, to the 13<sup>th</sup> July 2022.**

**The remainder of the paper is therefore for reference only.**

**POLICY: HE1 PROTECTION OF HERITAGE ASSETS**

- i. Great weight will be given to conservation and enhancement of heritage assets listed in the Northam Parish List of Local Heritage Assets (NPLLHA). Development proposals will supported only where they conserve and enhance the archaeology and/or fabric, setting, and significance of a heritage asset listed in the NPLLHA.**
- ii. Development proposals which impact upon a heritage asset listed in the NPLLHA will be supported providing they propose increased opportunities for access, education and public appreciation of the historic environment, or propose other viable uses for the asset consistent with its conservation.**
- iii. Where a heritage asset listed in the NPLLHA shows signs of neglect or deliberate damage, the harm done to the asset will be accorded no weight in any decision on its future.**
- iv. Development of any designated or non-designated heritage assets in the NNP area will be supported where proposals use vernacular design and materials, thereby reinforcing local character and distinctiveness and a strong sense of place.**

General point: We suggest that policy is retained. TDC suggest wrongly that the Local Plan already protects the undesignated sites in policy HE1. This has not shown to be correct in numerous applications. The Local Plan does not provide for a local list for Northam - nor does it provide a mechanism for updating the list, nor does it mention materials and vernacular styles.

General point: Supporting text needs rewriting to state why it is necessary for NNP to have its own heritage policy and list - large number of sites, mostly undesignated and many under threat. Text should also explain how HE1 different from ST15 (and also how it supports ST15 and NPPF). HE1 is really about the local application of ST15 taking into account Northam's uniquely rich heritage. Reason for suggestion - to address TDC comment.

## **POLICY: EN5 PROTECTION OF BIODIVERSITY**

**Proposals which are likely to have an adverse impact on local biodiversity, will only be supported where it can be demonstrated that there is no alternative which would cause a less harmful impact, or mitigation measures which can be introduced resulting in a net enhancement to the sites biodiversity. As a last resort, acceptable local alternative habitat must be provided which increases biodiversity compared to the development site.**

**Development proposals will be supported where:**

- i. They retain and/or enhance the biodiversity of the site, including mature trees, hedgerows, hedge banks and areas of woodland. Also improving the connectivity of wildlife areas through green corridors, and/or improve the wildlife value of the landscape, including domestic garden habitats.**
- ii. If adjacent to or within primary green corridors as defined in Map (\*\*) they maintain and enhance the corridors function and demonstrate measures to secure connectivity of the corridor, thus supporting continued free movement of species through the site.**
- iii. They conserve, protect and enhance non-statutory and undesignated wildlife areas as listed in Appendix E and also listed in the Devon Biodiversity Records for Northam.**

**Conformity: DM08 ST14 NOR10 NPPF 170-175**

General point: TDC do not seem to have seen appendix on green corridors and wildlife sites.

Move first para to supporting text - reason for suggestion - first para reads like supporting text and duplicates provision in the Local Plan.

Suggest making policy about the green corridors as suggested by TDC. This would mean clause i would be focussed on improving green corridors. Reason for suggestion - biodiversity gain is in Local Plan.

Suggest retitling as protection of green corridors - reason for suggestion to match new focus.

General suggestion: add definition of green corridor to proposed NNP glossary - reason for suggestion - clarity.

Policy TR2

## **POLICY: TR2 CYCLE AND PEDESTRIAN ROUTES**

- i. Development proposals will be supported where;**
  - a) they deliver safe and attractive pedestrian and cycle routes, including within and from the site, to main settlements, local facilities, bus stops, existing footpaths, bridleways and cycle ways in the area;**
  - b) footpaths and cycle ways are provided where this would create safer and more convenient routes than pavements and roads;**
  - c) new pedestrian and cycle-ways to and from the development should use the easiest practicable gradients and include planting schemes to create attractive routes; and**
  - d) they incorporate cycle parking facilities.**
- ii. Proposals to upgrade or extend existing footpaths, cycle-ways and bridleways will be supported, providing such proposals, including their materials and any lighting, do not harm the rural character of the area.**
- iii. BID08 of the NDAT Local Plan 2011-2031 regarding Kenwith Valley from Westward Ho! To Bideford will be supported for the development of a pedestrian and cycle way**

- where the proposed route lies within the Northam Neighbourhood Plan area.
- iv. **The creation of a cycle and pedestrian link from Heywood Road to the Torridge Bridge and across to the Tarka Trail will be supported.**

**Conformity: ST02 ST10 NOR(j) NPPF 84,91,102,104,110**

General point: this policy is basically OK. Suggest altering policy to address TDC comments - you may want to dispute claim by Devon Highways that clause iv route is unsafe. Reason for suggestion - link proposed is safer than cyclists and pedestrians trying to create their own unmarked routes between Torridge Bridge and Tarka trail.

### **Policy TR3: PUBLIC TRANSPORT**

- 1. Engage with the public transport provider and the County Highway Authority to achieve a local public transport system that meets user needs.**
  - i. Encourage and support plans to achieve a reliable and frequent bus service for housing developments at Cornborough Road, Daddon Hill and Buckleigh Road .**
  - ii. Encourage bus services which link effectively with rail services in Barnstaple.**
  - iii. Encourage bus services which enable schoolchildren and students to travel to local schools and colleges at the required times.**
- 2. Applicants for new housing developments will be required to show that a proposed development would link well with existing public transport.**
- 3. Encourage proposals to provide alternative bus services to those running regularly on main routes, such as community buses, ring and ride services and car sharing .**
- 4. Regarding Appledore encourage proposals to promote greater bus use and use of alternative public transport facilities in order to reduce pressure on parking spaces in the village.**
- 5. With reference to Northam Town Council's Climate Emergency target of net zero carbon emissions by 2030 the provision of electric and hydrogen powered public transport will be supported and encouraged.**

**Conformity: TBC**

General suggestion - Need to refocus policy on accessibility of public transport. If need be developers need to arrange bus links to their developments. Policy may need new title.

Cut para 1, 3, 4 and 5 as largely not planning matters.

Link para 2 to CIHT data on walking limit distances to bus stops. Para 2 reworded to make it clear that bus stops must be demonstrably safe and accessible on foot for people with restricted mobility. Reason for suggestion - CIHT data provides clear evidential basis for standards. By mentioning people with restricted mobility the policy becomes inclusive and it addresses issues a site may have foot access such as gradients, limited pavements, poor lighting etc.

Policy ED1

### **POLICY: ED1 BUSINESS**

- i. Within development boundaries, proposals will be supported for new business premises and the expansion of existing ones, or new start-up/incubator units, with preference given to brown-field sites, provided that proposals demonstrate they will benefit the local economy.
- ii. Within development boundaries, proposals for live/work home units will be supported provided they are not detrimental to the amenity of neighbours.
- iii. Within the development boundary of Appledore and the Appledore Maritime Employment Zone defined on Map (tbc) development proposals for maritime, engineering and allied trades or associated industries will be supported providing they conform to the appropriate character policies for the location.
- iv. Outside settlement boundaries and the Appledore Marine Employment Zone, small scale proposals for i) farm diversification schemes and ii) other rural business enterprises which require a rural location will be supported providing an economic need is demonstrated which benefits the local economy, and which cannot reasonably be met within development boundaries and also provided that proposals comply with Policies on Coalescence and Protecting the Rural Character between settlements.
- v. Loss of existing employment uses will only be supported where it can be demonstrated that the existing use is no longer required or viable, and that the premises/site/ business has been actively marketed for at least twelve months at an appropriate market price.

**Conformity: ST06 ST09 ST11 DM09 DM11a DM12 DM13 DM14 DM15 NPPF80-84**

General comment - we think ED1 should be retained because it provides valuable local guidance on economic development that matches Northam needs.

New supporting text will explain need for policy how it differs to Local Plan policies and how it builds on local plan policies.

Policy TR4 Public Car Parking

#### **POLICY: TR3 PUBLIC CAR PARKING**

- i. The loss of public car and motorcycle parking spaces serving the three centres will be resisted unless it can be demonstrated that the loss of any such spaces would not adversely affect the vitality and viability of that centre as a retail, service and visitor destination.
- ii. Development proposals will be supported where they maximise the potential for cycling and walking linkages to, between and within the centres in the Plan area.
- iii. Support will only be given to the development of additional car parking provision through the redevelopment of existing brown- and grey-field sites, amending or adding to their existing usage. and conforms to EN2 and EN3.
- iv. Support will be given to the development of a park-and-ride or park-and-change site to relieve the pressure on the centre of Appledore, provided that it is of an appropriate scale, layout and design and has appropriate regard to the character and appearance of the surrounding area, the Conservation Areas and other heritage assets and conforms to EN2 and EN3.
- v. Support will be given to improving the quality of public and on-street parking in the centres so that it is convenient, safe, secure and available for short-stay use in order to protect the vitality and viability of the centres as retail, service and visitor destinations.
- vi. The loss of any privately owned or controlled parking provision within the centres will be unacceptable where it will result in additional on-street parking or reliance on public car parking provision.

## **Conformity: TO BE CONFIRMED**

General point - policy needs refocusing as protection for parking provision with a new title to reflect this focus. Reason for suggestion - this is what policy is about, also renumber policy it is actually TR4.

Remove clause ii and consider putting it in TR2. Reason for suggestion - its to do with cycling/walking and not public parking.

Re: clause iv - no park and ride site is allocated. Either consult with landowners to find site plus collect evidence that visitors would use the site or cut clause iv - reason for suggestion lack of evidence. In addition unscrupulous landowners could use creation of parking as back door route to housing development in green gap.

Policy ED2 Tourism Attractions and Accommodation

### **POLICY: ED2 TOURISM ATTRACTIONS AND ACCOMMODATION.**

i. Within the defined settlement development boundaries, proposals for sustainable tourism attractions, leisure developments, a diverse range of new tourist accommodation, and associated tourism facilities and services will be supported where they do not detract from the character of the area or affect protected landscapes, residential amenity, environmental or heritage assets.

ii. Within the area defined on Map B2 a-c, proposals which provide for extensions to existing tourism attractions or tourism accommodation will be supported provided:

(a) They cannot reasonably be located outside the area defined on Map B2 a-c.

(b) In the case of tourism accommodation, they are for the reuse or conversion of existing buildings; and

(c) Proposals comply with policies EN2, EN3 and ND and T Local Plan policy DM17.

iii. Outside the defined settlement development boundaries and the area defined on Map B2 a-c, proposals which provide for extensions to existing tourism attractions or tourism accommodation will be supported provided:

(a) They cannot reasonably be located within settlement development boundaries; and

(b) Proposals comply with ND and T Local Plan policies DM17 and DM18.

### **Conformity: ST09 ST13 ST14 NOR NOR05 NOR06 DM08A DM17 DM18 NPPF 166-169**

General comment - this policy is needed to guide tourism proposals.

New supporting text will explain need for policy how it differs to Local Plan policies and how it builds on local plan policies. Need for policy is due to the different needs for tourism development in the settlements, of the green gap area and the open countryside, also the pressure for tourism development in unsustainable locations. ED2 protects green gap area from new-build holiday housing - this is unsustainable development in this area.

Policy HE2 Richmond Dock

## **POLICY: HE2 RICHMOND DOCK**

The NDTLP Spatial Vision for Northam states that Appledore will develop further as 'a centre for maritime activities'.

This objective is supported and the Richmond Dock site (Map B5) is allocated for redevelopment as a visitor attraction, with a dry dock capable of admitting ships, which may be combined with small business units.

Proposals for the site will be supported where:

- i. They enable public access to the historic site and enhance the tourism offer of Appledore
- ii. The design, massing and materials used in any new buildings, enhances the setting and integrity of the dry dock and the adjacent conservation area.
- iii. Any new building would not exceed the height of the existing Grade II\* listed perimeter wall, being approx. 10ft, and further comply with the appropriate policies of the TDC Local Plan.
- iv. The dry dock remains capable of its original use, with sufficient vehicular access and clear working space.
- v. There is no adverse impact on the amenity of residents in the area, or on the existing flood defences on the site.
- vi. The construction methods do not adversely impact on the historic structure and setting.
- vii. The future maintenance of the dry dock, dock gate mechanism and curtilage walls to be secured through the provision of a legal agreement. (eg a S106 provided mechanism)

**Conformity: ECD3 ECD4 NOR ST09 ST15 NPPF185-189**

First two paras need to be moved to supporting text. New first para as suggested by TDC - reason to be less prescriptive, as TDC suggest.

This would mean removing clause ii and possibly i - reason for suggestion to avoid duplication with new first para of policy text.

New supporting text will explain need for policy how it differs to Local Plan policies and how it builds on local plan policies - in this case text should mention the lack of use of site, planning history and strong local value, value as working dock - all of which make a locally focussed policy imperative.

Policy ED3

## **POLICY: ED3 APPLEDORE EMPLOYMENT ZONE**

This policy would be triggered in the event of closure of the shipyard.

- i. As a former employment site, proposals for the redevelopment of the Shipyard site (MapB6) for non-employment uses will not be supported, unless such proposals meet all the requirements of policy DM13 of the NDAT Local Plan.
- ii. Proposals for the redevelopment of the Shipyard site for employment purposes will be supported, subject to the following being met:
  - a. That there is no detrimental impact on the amenity of occupants of neighbouring properties.
  - b. The design, massing and materials used on any building does not harm the setting of Tapeley Park House, or the character of the Undeveloped Coast.
  - c. Any Development proposal must include traffic and transport assessments, detailing measures to mitigate the impact of the development on the highway network.

**Conformity: DM13 NOR ST09 ST11 ST14 DM07 NPPF80-82 NPPF104**

General comment - present policy about shipyard closure. Suggest totally rewrite policy so it is about maintaining maritime employment use for land in designated area. Phrasing needs to be carefully considered to prevent use of land as hotels or offices. reason for suggestion: policy currently overlaps with Local Plan policies.

Consider allowing small business units also in the area. Reason - to maximise employment and economic development in area. If this is a good idea supporting text could mention that proposals could be for small business units or larger-scale redevelopment.

Need to have a clause requiring that development proposals maintain sufficient working area on the present docks to enable them to function as docks and locations for ship-related work. Reason for suggestion - to preserve potential to use docks for designed purpose in future, also to preserve maritime uses for area.

New supporting text will explain need for policy how it differs to Local Plan policies and how it builds on local plan policies.