

## Comments provided on behalf of Torridge District Council in response to a draft of the Northam Neighbourhood Plan (version 2.8 March 2022)

### General comments

- Consideration of timeframe for the Neighbourhood Plan.
- In reviewing policy content avoid duplication between policies and providing policy references with policy text. The neighbourhood plan will be read as a whole.
- Consider across the Neighbourhood Plan the potential for bringing together policy areas where there are common themes – such as transport and parking.
- When reviewing the policies ensure there is no tension between policies that would result in confusion when applying them to development proposals – such as the approach to enabling development beyond the development boundaries.
- Ensure a consistent approach to the use of abbreviations, reference to other documents – such as the North Devon and Torridge Local Plan.
- In reviewing the composition of policies ensure that the requirements are precise and clearly provide the basis for determining a planning application-indicate on what basis a development would be supported. Suggest reviewing the structure of policies, such as: Proposals for... will be supported where....
- Policy requirements should be precise and clear as to when they will be applied. Phrasing such as may be sought, or consideration will be given should be avoided. If “where appropriate” is used, there needs to be clarity as the qualifying development.
- In policy avoid referring to other NNP/NDTLP policies. Reference to related policies is appropriate within the supporting text.
- Additional of a glossary for technical terms.
- Consider re-ordering the policy themed areas to reflect the focus of the environment and heritage.
- In using maps, make sure that they have a key to ensure the user is clear as to the information being presented.
- In each policy section ensure a consistency of presentation, which may include objectives, a justification for the proposed policy and how the policy should be implemented.
- Reference to strategic policies in the NDTLP and paragraphs in national planning guidance do not need to be referenced in policy boxes. A separate document, a Basic Conditions Statement- will be required which sets out how general conformity with national and local policies is achieved. The Basic Conditions Statement will be one of the documents required to be provided with the submission version of the neighbourhood plan.
- When referring to evidence ensure it is appropriately referenced to enable it to be reviewed.
- Care is required when referencing consultation outcomes, while indicating local concerns/issues they alone should not be taken as the sole basis for a policy approach. The main point of reference for consultation outcomes will be the Statement of Community Engagement.
- When referencing evidence, ensure it is up to date/ the most recent in respect of relevance. When quoting sources ensure such can be sourced, generally through website links.
- There is no need to refer to the neighbourhood plan area in policy, as this is established by the defined plan area.
- When referring to policy in the supporting text, the policy reference should be provided for clarity.
- Review policy numbering.

- In the introductory element of a policy refer to “Development” rather than “Development proposals”.

**Note detailed comments are not generally provided in relation to the supporting text as these paragraphs may be amended in response to future policy revisions.**

Foreword	
Addition	Clarification that the document is published for public comment, the dates over which comment is sought and how comment can be made.
1.2	Suggest indicating that the NP will support the delivery of planned development – not appropriate to refer to possible future development – development will occur over the plan period, as enabled by the NDTLP.
1.3	Would not refer to Neighbourhood Plans as new given their introduction through the 2011 Localism Act.
1.4	<p>Would not refer to a revised approach (by government) given the time period that the opportunity to undertake neighbourhood planning has been in place.</p> <p>Need to be careful about indicating it will be for the community to adopt the NP, this is the responsibility of the District Council following a positive referendum outcome.</p>
1.5	Suggest rewording 2 <sup>nd</sup> sentence. They have explored a range of topics areas, including:....
2.4-2.6	<p>Suggest rephrasing – Neighbourhood Development Plans were introduced under the 2011 Localism Act, which became law in April 2012, the objective of which was to give local people more of a say in shaping the growth of their communities.</p> <p>In August 2017 Torridge District Council recognised Northam Town Council as an appropriate Qualifying Body to submit a Neighbourhood Development Plan and approved the neighbourhood area that will be covered by the Neighbourhood Plan; the Civil Parish of Northam (Figure 1). Insert Map at this point.</p> <p>Neighbourhood Planning is a Government initiative which provides a means by which local people can influence planning and development in their local area.</p> <p>A Neighbourhood Plan is a community driven document which can:</p> <ul style="list-style-type: none"> <li>• Provide a shared vision for the neighbourhood area</li> <li>• Protect the Neighbourhood Area’s unique heritage</li> <li>• Determine where new homes and other developments may be built through positive planning</li> <li>• Influence types and designs of new developments</li> <li>• Identify and protect important green spaces, valued landscapes and treasured heritage assets</li> <li>• Identify the facilities and services needed for the community</li> <li>• Help ensure that our natural environment is conserved and protected</li> </ul> <p>The Neighbourhood Plan must be in general conformity with strategic local planning policies with the with the Government’s wider policies. Following a successful local referendum, the Neighbourhood Plan will become part of the statutory development plan</p>

	<p>for the local area, sitting alongside the North Devon and Torridge Local Plan (NDTLP) adopted in 2018.</p> <p>The Northam Neighbourhood Plan (NNP) is supported by a range of evidence and community engagement. The NNP will add value to the NDTLP, being used to shape future development in Northam.</p>
Consultation	<p>Needs review – current commentary relates more to process than consultation.</p> <p>Indicate that consultation with the community commenced in 2018, which sought views on .... Indicate the means by which the community was consulted and how the outcomes were responded to, as set out in a Consultation Statement.</p> <p>Add detail of the process (remove from the consultation stage). Following this consultation, received responses will be reviewed and as considered necessary the Neighbourhood Plan will be revised.</p> <p>The Neighbourhood Plan will then be submitted to the District Council to undertake formal consultation, the response from which will be considered by an independent examiner appointed by the District Council in liaison with the Town Council. The examiner will consider the submitted comments and determine whether or not all the prescribed requirements, relating to “<a href="#">Basic Conditions</a>” have been met.</p>
2.12	<p>This paragraph relates more to process.</p> <p>Suggestion such as - This draft Neighbourhood Plan is published by the Town Council as a consultation document, comment on which is sought from those who live and work within the Parish.</p> <p>Could indicate that the detail of how consultation was undertaken, and that the outcomes provided by the community are set out separately in a Statement of Community Engagement.</p> <p>Could outline the issues raised by the community at date</p>
2.13	<p>The reference to the NDTLP, does not sit well within this section of the document.</p> <p>Note the NDLP provides for the development of a minimum of 1,916 dwelling over the period 2011-2031 not 1,780.</p>
2.14	<p>If the content of this paragraph is the outcome of consultation, this should be made clear.</p>
3.0 Vision and Objectives	<p>Clarification is required as to what element of this section is presenting the vision for the neighbourhood plan area and related objective.</p> <p>Consistency of presentation of objections, could be presented in Section 3 relating to the policy themes, or included in the policy themed areas.</p>
4.0 Community	<p>Question the need to designate “community hubs” and the listing of them. The policy objective appears to be the protection of exiting community services and facilities and to support the development new facilities/services.</p> <p>Suggest there is no need for (ii) as the protections sought will be provided by other policies of the neighbourhood plan.</p>

	Note NDTLP Policy ST22 provides similar protections for community services and facilities and support for new/expansion or improvement of such, subject to tests, which include not harming the character of the area.
4.9-4.13	Question the reference to Asset of Community Value – which will not be a consideration in the determination of planning applications.
5.1	<p>Suggest a review of the referenced evidence if relying on it for a policy approach.</p> <p>Last sentence, is there any evidence to support the statement relating to new residents – and their origin?</p> <p>It may be that recent developments and enabled developments have not achieved the 30% affordable housing target, or that the achieved housing mix is not considered to reflect locally generated needs, but such should be qualified by evidence – or such could be indicated as a concern in the consultation statement.</p>
5.2-5.9	<p>A lot of the discussion is around second homes and holiday accommodation, but the presented evidence does not indicate that this is a significant issue or that it negatively impacts availability and affordability. This is not to say that the supply and access to suitable housing is not an issue, but care is required as to stating that the cause of this is related on second/holiday homes.</p> <p>Is there any evidence that new homes have been purchased as second homes or for holiday lets, to a significant extent that would impact on availability and affordability. Note that holiday specific accommodation has been provided, which supports the role of the area as a tourist destination, which would not be available for year-round accommodation or to make a contribution to the supply of affordable housing.</p> <p>The presented evidence around second homes does not suggest this to be a significant issue and there is no reflection of this concern in Policy HO1.</p> <p>Responses to consultation is useful as an indication of local concerns, but further up to date evidence would be required to support a policy approach that varies from the evidenced position provided for the NDTLP.</p> <p>Suggest the focus for the comment is the need to secure housing to meet the range of housing needs by type, size and location.</p> <p>If there is an evidenced position, there would need to be clarity as to what would be expected from a qualifying development (which would need to be defined) as to the form of housing to be provided.</p>
Policy HO1	<p>Consider what is required from the policy. Suggest if retained, the emphasis should be addressing local needs, reflecting evidenced need. Question the reference to “smaller dwellings”. If alternative requirements, to those provided by evidence in support of the NDTLP are proposed they need to be identified and evidentially justified. Similarly, if bungalows are to be a required element of development, the justification and requirement needs to be established.</p> <p>No considered basis to apply the restriction of 5-bedroom accommodation. Again, the policy focus should relate to evidenced need and there is no basis to restrict to occupation.</p>

	The reference to Lifetimes Home Standards is duplicated in NDTLP Policy DM 4(2), which relates only to major development. Additionally note it has a successor: <a href="#">Building for a Healthy Life</a> and that it is a tool to improve development.
5.13	Suggest clarification of the circumstances through which sites which qualify to deliver affordable housing have not achieved the NDTLP requirement of 30%. The NDTLP, reflecting national planning policy enables schemes to come forward with a reduced proportion of affordable housing subject to viability considerations. Note viability assessment are subject to independent review, not just agreed by the LPA and that when considered by the LPA they should relate to current market conditions. It is recognised that market conditions may alter during the lifetime of the consent and during site construction, if the site comes forward. On multi phased schemes it may be appropriate for a viability review.
HO2	Not clear how this policy will add to the delivery of affordable housing beyond that provided in the NDTLP. In NNP policy, avoid referring to NDTLP policy. Unnecessary to reiterate PPG provisions in relation to viability.
51.7-5.20	Appears to come under the heading of affordable housing – suggest the need for a sub-title.
HO3	The policy title does not relate well to the policy. The policy appears to relate to residential amenity. Clarity is required as to what constitutes amenity space. Any requirements need to be defined and there needs to be clarity as to how they will be applied and to what type of development. For example, “adequate” is imprecise in respect of coming to a view and “may” should be avoided in policy. If requirements are defined they need to be justified, which can be through reference to evidence in the supporting text. There is a lot of cross over between this policy and HOL04 – could they be brought together?
HO4	Clarification required as to whether the policy is specific to Housing.  Avoid indicating in policy information requirements – such will be a matter determined by the Validation/Local List and will not be required for all development types/ and scales of development.  Consider what element of the policy adds to Policies ST04 and DM04 of the NDTLP. If there are housing specific elements - as opposed to general requirements, could they be incorporated into Policy HO3?  Consider rephrasing the policy (if related) along the lines: development will be required to be of a high design standard – followed by what will be expected.  In considering the requirements to achieve design quality ensure that judgements can be made as to the acceptability of the proposal such as defining what suitable provisions in criterion iv. In respect of this provision, if retained it is not necessary to indicate in policy the possible use of storage space; such will vary according to property type. Criterion v seems restrictive and unlikely to be achievable from all forms of housing developments. If retained could iv and v be combined to relate to general and refuse storage space. Note a possible tension between the Policy criterion ii and paragraph 5.26.
HO5	Clarity is required in respect of the introduction to the policy, is it the policy intent that all new dwellings will be required to have the listed energy conservation/carbon reduction features, or the delivery of such features will be supported when proposed? Note that

	<p>planning can only be used to influence the form of existing dwellings, suggest removing the reference to existing dwellings.</p> <p>Consider how the introductory elements of the policy relate to the listed requirements and how they would be determined to meet the requirements. Additionally, is there an opportunity to bring 1 and 2 together. In 2 “other” would need to be defined?</p> <p>Consider on what basis would energy efficiency be increased as set out in criterion 1a) – suggest this element of the policy is an aim and would be better placed in the supporting text.</p> <p>There is no need for examples to be included in policy, rephrasing is suggested, additionally it is not possible to ask developers to accommodate technology that is not yet available.</p> <p>Reference to EV charging points is unnecessary-new Building Regulations now require all new homes with associated parking and other uses (which have 10 parking spaces) to install EV charging points. It is not appropriate to replicate requirements set out in other legislation. Building Regulations now set the requirements relating to the installation of EV charging points</p> <p>Suggest the need for clarification as to the form of alternative energy systems, would the policy for example include onshore wind, if not this exclusion will need to be stated. It would be helpful in the supporting text to indicate what is meant by community scale and would there be distinction between community and commercially owned schemes.</p> <p>The information requirements are not a matter to be set out in policy, all materials required to consider an application will be set out in the Councils Validation/Local List.</p>
5.32-5.37	<p>Suggest early clarification that the policy relates to residential parking – using the reference “development” is not sufficiently precise.</p> <p>If updated evidence is available this should be referenced. The referenced evidence would now be considered out of date.</p> <p>Suggest a review of the policy intent as set out in the supporting text. What are the policy objectives, is it to ensure adequate residential parking is provided or to ensure that when parking forms part of a residential scheme the visual impact on the streetscape is minimised? In respect of ensuring a quality design, this matter would be separately addressed by the design policies in the NNP and NDTLP.</p> <p>Review paragraph 5.36. no evidence is provided as to a minimum requirement, and if the intent is to minimise off street parking, should the policy limit the number of such spaces to be provided. TR1 does not indicate a limit only a requirement. It is worth considering that overspill from off street parking may result in on street parking resulting in the visual intrusion that is sought to be avoided, as set out in paragraph 5.37.</p>
TR1	<p>Suggest an alternative introduction along the lines of “Residential parking provision should be designed to meet the anticipated needs of residents and visitors alike, well integrated and accessible to encourage maximum usage, based on the following minimum levels per dwelling” – this is taken from the Great Torrington Neighbourhood Plan. Clarity is required at the start of the policy that it relates to residential development, as current elements could otherwise be applicable to other forms of development.</p>

	<p>In setting requirements for drop off spaces and cycle provision, the quantity of such will need to be defined. I suggest relating the cycle provision by the number of bedroom as part of criterion i.</p> <p>In criterion i I suggest there is no need for “per dwelling” as the number of bedrooms is already defined, further, given that there will be properties that provide more than 4 bedroom there should be a 4+bedroom requirement at his point in the policy, not in v.</p> <p>Consider the following to take account of circumstances where the general requirement cannot be met (taken from the Torrington Neighbourhood Plan) “development with lower provision may be considered acceptable in areas of high accessibility or where the type of residential development proposed is likely to generate less demand (such as sheltered accommodation and/or in town centre locations) when applicants will be required to demonstrate the proposed level of parking provision would be unlikely to result in increased demand for parking in the surrounding area or that sufficient capacity or alternative provision is available (e.g. in public car parks).”</p> <p>Consultation with the Highway Authority is not a matter for inclusion in policy, suggest removing the reference.</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.</p>
HO7	<p>Consider the value of this policy. The opportunity for residential care/nursing homes is established in the NDTLP, on the proposed basis.</p>
EN1	<p>Suggest a simplification of the policy. Local Green Spaces are designated in the following locations, as defined in [add map reference] ... list the locations. The images would be better placed in the appendix which justifies their designation.</p> <p>As a separate element to the policy, consider a refocus of the second element of the policy, to enable development within the Local Green Spaces that would enable development which would result in an enhancement of the value that justifies its designation</p> <p>In seeking to designate Local Green Spaces, need to ensure/demonstrate that the qualifying criteria are met. Additionally, in seeking such designations, landowners should be consulted.</p>
6.7-6.13	<p>Note that Northam is not designated as a “dark skies” area. If retained, suggest providing a definition in a glossary, not the supporting text.</p> <p>Suggest rephrasing 6.9-6.10, to indicate that the NDTLP provides a range of protections to maintain the distinct settlements within the parish, including a strategic objective that seeks the avoidance of coalescence between Northam and Appledore and defines a Green Wedge to the south of Northam together with development limitation that are in place within the Undeveloped Coast.. Could indicate that the NNP seeks to add further protections relating to..</p> <p>Note the area design statements should be discounted as evidence, not only given their age, but that they were not adopted by the Council.</p> <p>Note should not refer to exceptionally permitted development. The Neighbourhood Plan should look to manage development, not assume that development outside its scope will come forward.</p>

EN2/EN3	<p>Consider this policy alongside EN1 and EN3. There seems to be some inconsistency as to what will be enabled beyond NDTLP development boundaries. The policy appears to seek an extension of NDTLP policy with regard to the avoidance of coalescence between the 3 settlements. Additionally consider the protections that are in place with regard to the Undeveloped Coast provided by NDTLP Policy ST09.</p> <p>The policy would need to be rephased to be positive in respect of enabling limited forms of development that are considered to be appropriately located beyond defined development boundaries, while safeguarding the integrity of the 3 settlements.</p> <p>Policy EN3 – consider the need for this policy.</p>
EN4	<p>Consider the need for this policy given the protections that are afforded by the NDTLP. If retained the policy should be rephrased, including removing the second paragraph, which provides a commentary and seeks supporting information, which are not policy matters.</p>
HE1	<p>The policy duplicates the protection/requirements provided by NDTLP ST15 and DM07. Question the need for the policy.</p>
6.37-6.39	<p>Focuses on the issues generated from consultation outcomes, consultation material should be referenced in the consultation statement.</p> <p>If referring to surveys, they need to be referenced.</p>
EN5	<p>The first element of this policy duplicates provisions in the NDTLP.</p> <p>Criterion i would not meet the requirement of biodiversity net gain required from development, as provided in the NDTLP.</p> <p>The policy could be refocused on defined green corridors.</p>
TR2	<p>Suggest rephrasing the policy to indicate what development will be expected to provide, having regard to the requirements provided by NDTLP Policy DM05.</p> <p>There is no need to refer to BID08, established policy in the NDTLP.</p> <p>Note a view from DCC iv-the proposed cycle route would be unsafe.</p>
TR3 Note there are 2 TRE policies	<p>Consider the validity of this policy, in respect that policy should set requirements/ indicate support subject to.. it is not appropriate in policy to “encourage” as such is not providing a basis for considering the acceptability of a proposal.</p>
ED1	<p>The policy provisions other than the reference to the Appledore Marine Enterprise Zone are provided for through the NDTLP Policies ST11 and DM13.</p> <p>iv also provides a duplication with NNP EN policies which are setting the parameters for development beyond defined development boundaries.</p> <p>Question the need for this policy.</p>
TR3	<p>It is not clear what the policy objectives are. Is the focus to safeguard existing public carparking? If this is the case, the policy could be developed on the basis of the need to secure existing public carparking capacity.</p> <p>Question the need for reference to a park and ride/charge facility when no site is identified, additionally in the absence of all allocation there may be a tension with the intent of EN policies.</p>



	Note that vi would be unenforceable. Private parking doesn't have to be used for parking.
ED2	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.
HE2	<p>The first and second elements of HE2 are not matters for inclusion in policy.</p> <p>Suggest a reconsideration of the policy, there needs to be clarity as to what is required from the site, taking account of what is achievable.</p> <p>Clarity is required from the policy as to what is sought outcome. The currently provided detail is considered excessive and may inhibit the sought outcome.</p> <p>Of note a previous Local Plan Policy (Torridge District Local Plan) provided flexibility as to development opportunities – "Proposals that secure the preservation of Richmond Dock will be supported provided the integrity of the structure and setting are retained."</p>
ED3	Question the need for this policy. The NDTLP seeks to protect sites in economic use and Policy NOR refers specifically to Appledore Shipyard in this respect. The elements set out in ii would be addressed by policies in the NDTLP.