



# **Report on the Georgeham Parish Neighbourhood Plan 2021 to 2031**

**An Examination undertaken for North Devon Council with the support of Georgeham Parish Council on the May 2021 submission version of the Plan.**

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Date of Report: 13 September 2021

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## **Main Findings - Executive Summary**

From my examination of the Georgeham Parish Neighbourhood Plan (GPNP/the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Georgeham Parish Council;
- The Plan has been prepared for an area properly designated – the Parish of Georgeham as shown on the map in the Consultation Statement on page 26 of the Supplementary Policy Documents and in the Appendix on page 96 of the submitted Plan;
- The Plan specifies the period during which it is to take effect: 2021 to 2031; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### *Georgeham Parish Neighbourhood Plan 2021–2031*

- 1.1 Georgeham Parish, which has a population of over 2,568,<sup>1</sup> includes two villages, Croyde which adjoins the coast and Georgeham, about 2.5km inland. Braunton is about 8km to the south east of Croyde along the B3231, where the road joins the A361 on which Barnstaple lies about a 8km further to the south east. The Parish is within the North Devon Coast Area of Outstanding Natural Beauty (AONB) and the landscape of the Plan area is truly outstanding, including the northern slope and downland of Saunton Down, extensive beaches at Croyde and Putsborough, the rocky headland of Baggy Point, the dunes at Croyde and secluded inland valleys, such as the one linking Croyde and Georgeham.
- 1.2 The decision to prepare the neighbourhood plan was made by Georgeham Parish Council (GPC) in October 2015 and following the formation of a subcommittee, a steering group was created to prepare the Plan, various consultation meetings were held and evidence gathered. The GPNP was

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<sup>1</sup> See paragraph 1.1.1 of the Plan.

submitted to North Devon Council (NDC) in May 2021, representing over five years' work for those involved.

### *The Independent Examiner*

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the GPNP by NDC, with the agreement of GPC.
- 1.4 I am a chartered town planner and former government Planning Inspector and have experience of examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the Plan.

### *The Scope of the Examination*

- 1.5 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the Plan meets the Basic Conditions.
  - Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
    - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
    - it sets out policies in relation to the development and use of land;
    - it specifies the period during which it has effect;
    - it does not include provisions and policies for 'excluded development'; and

- it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### *The Basic Conditions*

1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>2</sup>; and
- meet prescribed conditions and comply with prescribed matters.

1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Plan does not breach the requirement of Chapter 8 Part 6 of the Conservation of Habitats and Species Regulations 2017 ('the 2017 Regulations').<sup>3</sup>

## **2. Approach to the Examination**

### *Planning Policy Context*

2.1 The current Development Plan for Georgeham, excluding policies relating to minerals and waste development, is the North Devon & Torrington Local Plan (NDTLP) which was adopted in October 2018.

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<sup>2</sup> The existing body of environmental regulation is retained in UK law.

<sup>3</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published in July 2021 and all references in this report are to the July 2021 NPPF and its accompanying PPG.

### *Submitted Documents*

2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, as well as those submitted which include:

- the draft Georgeham Parish Neighbourhood Plan 2021–2031, dated May 2021;
- the map in the Consultation Statement on page 26 of the Supplementary Policy Documents and in the Appendix on page 96 of the submitted Plan, which identifies the area to which the proposed Neighbourhood Development Plan relates;
- the Consultation Statement May 2021;
- the Basic Conditions Statement May 2021;
- the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report, dated September 2020;
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the request for additional clarification sought in my letter of 3 August 2021 and the responses of 11 August from GPC and 12 August from NDC.<sup>4</sup>

### *Site Visit*

2.4 I made an unaccompanied site visit to the GPNP area on 22 July 2021 to familiarise myself with it and visit relevant locations referenced in the Plan and evidential documents.

### *Written Representations with or without Public Hearing*

2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. No requests for a hearing session were received.

### *Modifications*

2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal

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<sup>4</sup> View at: <https://northdevon.gov.uk/planning-and-building-control/neighbourhood-plans/georgeham-neighbourhood-plan/>

requirements. For ease of reference, I have listed these modifications separately in the Appendix to this report.

### **3. Procedural Compliance and Human Rights**

#### *Qualifying Body and Neighbourhood Plan Area*

- 3.1 The Georgeham Parish Neighbourhood Plan has been prepared and submitted for examination by GPC, which is a qualifying body. The GPNP extends over all the Georgeham Parish. This constitutes the area of the Plan designated by NDC on 7 December 2015.

#### *Plan Period*

- 3.2 The Plan specifies the Plan period as 2021 to 2031.

#### *Neighbourhood Plan Preparation and Consultation*

- 3.3 The concise Consultation Statement (CS), included within the comprehensive bundle of Supplementary Policy Documents, indicates the process of the preparation of the Plan which was aided by creating a specific web site and using Facebook and the Parish magazine "The Crydda". Two rounds of questionnaires were circulated, two public meetings and two drop-in sessions were held during 2016 and the Croyde Area Residents Association (CARA) conducted its own survey. Local businesses were also surveyed in 2016.
- 3.4 Plan preparation continued throughout 2017, 2018 and 2019 including the involvement of officers from North Devon Council. A draft Plan was widely distributed in November 2018 for pre-submission consultation, a consequence of which was to improve clarity and presentation. Throughout the process of preparation, regular reports were made to the Parish Council and the meetings of CARA held about three times per year.
- 3.5 The Pre-Submission Plan was published for consultation under Regulation 14 of the 2012 Regulations on 1 February 2021 for a period of nine weeks until 5 April 2021. Paragraph 5.12 of the CS lists the many elements of the communication strategy to consult stakeholders and members of the public. The tables on pages 30–48 of the CS list the organisations who were consulted and the response and action taken with regard to the Plan. Reference is also made to the 17 local residents who responded during the formal consultation period.
- 3.6 The Plan was finally submitted to NDC in May 2021. Consultation in accordance with Regulation 16 was carried out from 27 May 2021 until 9 July 2021. 19 responses were received. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the GPNP, that has had regard to advice in the PPG on plan preparation and is procedurally compliant in accordance with the legal requirements.

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### *Development and Use of Land*

- 3.7 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

### *Excluded Development*

- 3.8 The Plan does not include provisions and policies for 'excluded development'.

### *Human Rights*

- 3.9 The Basic Conditions Statement (BCS) advises that the Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. The BCS states that considerable emphasis was placed throughout the consultation process to ensure that no sections of the community were isolated or excluded. I have considered this matter independently and I have found no reason to disagree with that position and I am satisfied that the policies will not have a discriminatory impact on any particular group of individuals.

## **4. Compliance with the Basic Conditions**

### *EU Obligations*

- 4.1 The GPNP was screened for Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) by NDC. The details were submitted with the Plan in accordance with the legal requirement under Regulation 15(e)(i) of the 2012 Regulations.<sup>5</sup> As a result of the assessment, it was considered unlikely that there would be any significant environmental effects arising from GPNP that have not already been assessed in the Sustainability Appraisal or the HRA/Appropriate Assessment of the relatively recently (October 2018) adopted Local Plan.
- 4.2 Accordingly, a screening determination was issued by NDC, following consultation with the relevant national bodies. This advised that it was considered the GPNP did not require a full SEA or HRA to be undertaken. The Environment Agency<sup>6</sup>, Historic England<sup>7</sup> and Natural England<sup>8</sup>, when consulted, agreed with those conclusions.
- 4.3 Having read the SEA Screening Assessment Report and the other information provided, and considered the matter independently, I also

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<sup>5</sup> Strategic Environmental Assessment Screening (SEA) and Habitats Regulations Assessment (HRA) Screening Report: September 2020.

<sup>6</sup> Response from the Environment Agency, dated 5 August 2020.

<sup>7</sup> Response from Historic England, dated 1 September 2020.

<sup>8</sup> Response from Natural England, dated 1 September 2020.

agree with those conclusions. Therefore, I am satisfied that the GPNP is compatible with EU obligations.

### *Main Issues*

- 4.4 Having considered whether the Plan complies with various procedural and legal requirements, it is now necessary to deal with whether it complies with the remaining Basic Conditions, particularly the regard it pays to national policy and guidance, the contribution it makes to the achievement of sustainable development and whether it is in general conformity with strategic development plan policies. I test the Plan against the Basic Conditions by considering specific issues of compliance of all the Plan's policies.
- 4.5 As part of that assessment, I consider whether the policies are sufficiently clear and unambiguous, having regard to advice in the PPG. A neighbourhood plan policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>9</sup>
- 4.6 Accordingly, having regard to the Georgeham Parish Neighbourhood Plan, the consultation responses, other evidence<sup>10</sup> and the site visit, I consider that the main issues in this examination are whether the GPNP policies (i) have regard to national policy and guidance, (ii) are in general conformity with the adopted strategic planning policies and (iii) would contribute to the achievement of sustainable development? I shall assess these issues by considering the policies within the themes in the sequence in which they appear in the Plan.

### *Vision and Objectives*

- 4.7 The gist of the vision for the GPNP is to progress as a sustainable community striking a balance between meeting the needs of the current and future population and maintaining a thriving and diverse local economy, particularly through tourism, without harming the area's beauty and attractiveness. The vision is explained fully in paragraphs 2.1.1–2.1.5 of the Plan.
- 4.8 The Plan describes key principles of sustainability which underpin the policies and sets out a series of requirements that development proposals should meet in order to gain support. The Plan then develops five themes, each with its specific objectives and from which the policies logically flow: social and community; housing; the built environment; the natural environment; and economic development.

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<sup>9</sup> PPG Reference ID: 41-041-20140306.

<sup>10</sup> The other evidence includes the responses from GPC and NDC dated 11 and 12 August respectively to the questions in my letter of 3 August 2021.

### *Social and Community (Policies SC1, SC2, SC3 and SC4)*

- 4.9 Policies SC1 and SC4 aim to safeguard community facilities and sports and recreational facilities respectively. Each policy has regard to national guidance<sup>11</sup>, generally conforms with Policies ST12 and ST22 of the NDTLP and meets the Basic Conditions. Policy SC2 supports proposals for development or expansion of the school and has regard to national guidance<sup>12</sup>, also generally conforms with Policy ST22 of the NDTLP and meets the Basic Conditions.
- 4.10 Policy SC3 seeks the provision of facilities for walking, riding and cycling in new development and access between the development and local amenities by non-motorised means. Whereas the policy has regard to national guidance<sup>13</sup> and generally conforms with Policy ST10 of the NDTLP, in order to assist with deliverability, I shall recommend a modification by the addition of the sentence to the policy as suggested by NDC. **(PM1)**

### *Housing (Policies H1, H2, H3, H4 & H5)*

- 4.11 Policy H1 aims to impose a principal residence occupancy condition on all new housing. The policy has regard to national guidance<sup>14</sup>, generally conforms with Policy ST17 of the NDTLP and meets the Basic Conditions. However, in response to my questioning about why to explicitly exclude like for like replacement dwellings from the policy and why it should not apply to new dwellings outside development boundaries, GPC replied that they would like all new housing, including re-builds on a like-for-like basis, to be for permanent residence only, and for this policy to apply to all new residential building within the Parish not just within the development boundaries of the hamlets. Therefore, to ensure the consistent application of the policy, I shall recommend modifying Policy H1 accordingly. **(PM2)** NDC suggested that affordable housing should be excluded from the policy, but I see no sound reason for that exclusion, which could encourage an abuse of the terms under which affordable housing is permitted.
- 4.12 Policy H2 requires affordable housing for local people within the development boundaries of Georgeham and Croyde that would result in a net increase of six dwellings. The policy has regard to national guidance<sup>15</sup>, generally conforms with Policy ST18 of the NDTLP and meets the Basic Conditions.
- 4.13 Policy H3 supports the development of land of one hectare or less outside the development boundaries for affordable housing subject to specified

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<sup>11</sup> NPPF: paragraphs 84 & 93.

<sup>12</sup> NPPF: paragraph 95.

<sup>13</sup> NPPF: paragraphs 92, 100 & 104.

<sup>14</sup> NPPF: paragraph 62.

<sup>15</sup> NPPF: paragraphs 60–64.

criteria. The policy has regard to national guidance<sup>16</sup>, generally conforms with Policies ST07 and ST19 of the NDTLP and meets the Basic Conditions. Policy H4 seeks to restrict the change of housing from residential use to holiday let unless certain conditions are met. The policy also has regard to national guidance<sup>17</sup>, generally conforms with Policies ST13 and ST17 of the NDTLP and meets the Basic Conditions. Finally, Policy H5 specifies that housing density of all sites should result in development in character with its immediate surroundings. The policy has regard to national guidance<sup>18</sup>, generally conforms with Policy ST04 of the NDTLP and meets the Basic Conditions.

*The Built Environment (Policies BE1, BE2, BE3, BE4, BE5, BE6, BE7, BE8 & BE9)*

4.14 This section of the Plan includes nine policies derived from the eight objectives which are described immediately preceding the policies. Each policy has regard to national guidance and generally conforms with strategic policies of the NDTLP as listed in the table below.

GPNP Policy	Topic	NPPF paragraph	NDTLP Policy
BE1	New development	126 – 127	ST04, ST14
BE2	Replacement buildings	126	ST04, ST07, ST17
BE3	Boundary treatments	126	ST04
BE4	Listed buildings, Conservation Areas and Character Areas	195	ST04, ST15
BE5	Applications outside the development boundaries	79, 84	ST07
BE6	Extensions to existing properties	104, 130	ST04, ST14
BE7	Other provision	130	ST02
BE8	Disturbance and pollution	174, 184	ST01
BE9	New recreational and sporting facilities	176, 178	ST04, ST07, ST14

4.15 Policies BE1-BE8 meet the Basic Conditions. However, “an existing complex” in Policy BE9 is too ambiguous for effective development management. Accordingly, after seeking clarification from GPC, I recommend that a brief explanation is given as a footnote to the policy which follows the format used elsewhere in the Plan. **(PM3)**

*The Natural Environment (NE1, NE2, NE3 & NE4)*

4.16 Policy NE1 considers the effect of proposed development on the landscape and Policy NE2 considers flora, fauna and forestation in development

<sup>16</sup> NPPF: paragraphs 62, 78 & 79.

<sup>17</sup> NPPF: paragraph 62.

<sup>18</sup> NPPF: paragraph 124.

proposals. Both policies have regard to national guidance<sup>19</sup>, generally conform with Policy ST14 of the NDTLP and meet the Basic Conditions.

- 4.17 Policy NE3 describes the policy for managing development in Local Green Spaces, which are defined in the Green Space Policy Compliance Statement within the Appendices of the Plan. Three Local Green Spaces (LGS) are defined in Croyde (The Rabbit Field, Croyde Village Green, and Croyde Village Play Park) and two in Georgeham (Georgeham Recreation Ground, and Georgeham Glebefield and Green).
- 4.18 As explained in the NPPF, LGS designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.<sup>20</sup> Having seen each LGS when I visited the area, I agree with the designations.
- 4.19 However, the title of the policy is slightly misleading because it applies only to LGS and does not include other green and open spaces. Therefore, I shall recommend that the policy title becomes Local Green Spaces. **(PM4)** NDC suggested that the policy could include guidance about what would or would not be permitted in an LGS. Policy NE3 accurately states that policies for managing development within a LGS should be consistent with those for Green Belts. NPPF paragraphs 147–151 give advice on how proposals for development in the Green Belt should be considered. In my view, the nuances of Green Belt policy could not be adequately addressed within the Plan without the danger of being either misleading or longwinded. Nevertheless, the short phrase I have recommended within PM4 as a modification is accurate and succinct and, together with listing the individual LGS, ensures that Policy NE3 has regard to national guidance<sup>21</sup>, generally conforms with Policies ST09 and ST14 of the NDTLP and meets the Basic Conditions.
- 4.20 Policy NE4 considers energy efficiency in new development and has regard to national guidance<sup>22</sup>, generally conforms with Policies ST02, ST05 and ST16 of the NDTLP and meets the Basic Conditions. However, the first of the two criteria in the policy is unacceptably ambiguous for effective development management. Therefore, I shall recommend the suggestion by NDC to transfer the gist of the first criterion to the objectives in paragraph 6.3.1 and also alter the title of the policy to Small Scale Renewable Energy, which would reflect its true content. **(PM5)**

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<sup>19</sup> NPPF: paragraph 174.

<sup>20</sup> NPPF: paragraph 102.

<sup>21</sup> NPPF: paragraph 103.

<sup>22</sup> NPPF: paragraphs 152 – 155.

### *Economic Development (Policies ED1, ED2, ED3 & ED4)*

- 4.21 Policy ED1 supports the development of community workspace within and adjoining the development boundaries. Policy ED3 supports the conversion of existing buildings for rural business development. Each policy has regard to national guidance<sup>23</sup>, generally conforms with Policies ST07 and ST11 of the NDTLP and meets the Basic Conditions.
- 4.22 Policy ED2 considers development on, and development of, agricultural land. The policy has regard to national guidance, generally conforms with Policies ST10 and ST14 of the NDTLP and meets the Basic Conditions, subject to modifications which I shall recommend in order to overcome two ambiguities. The first modification is to describe an existing complex in the policy as “agricultural”. **(PM6)** The second is to clarify criterion b), which currently has the effect of limiting development to land served by public transport, walking and cycling. It seems to me that any development could be served by walking; most could be served by cycling; but, considering the limited bus routes within the Parish, little could be served by public transport.
- 4.23 The NPPF advises that development in rural areas should not have an unacceptable impact on local roads and should exploit opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).<sup>24</sup> Therefore, I shall recommend rephrasing criterion b) of the policy so that it has regard to NPPF guidance. **(PM7)** The policy would also generally conform with Policies ST10 and ST14 of the NDTLP and meet the Basic Conditions.
- 4.24 Policy ED4 supports the development of land for camping and caravan sites, including the extension of opening times. The policy has regard to national guidance<sup>25</sup>, generally conforms with Policies ST04, ST13 and ST08A of the NDTLP and meets the Basic Conditions. An ambiguity which it is necessary to clarify is whether the policy refers to temporary and/or permanent facilities. The response from GPC confirms it means both and I shall recommend an appropriate modification. **(PM8)**

### *Overview*

- 4.25 Accordingly, on the evidence before me, with the recommended modifications, I consider that the policies within the GPNP are in general conformity with the strategic policies of the NDTLP, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.
- 4.26 A consequence of the acceptance of the recommended modifications would be that amendments would have to be made to the explanation

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<sup>23</sup> NPPF: paragraph 84.

<sup>24</sup> NPPF: paragraph 85.

<sup>25</sup> NPPF: paragraphs 84, 85, 174, 176–178.

within the Plan in order to make it logical and suitable for the referendum. These might also include incorporating factual updates, correcting minor inaccuracies, revising references to NPPF (2021) updated paragraph numbers or improvements suggested helpfully by NDC. None of these alterations would affect the ability of the Plan to meet the Basic Conditions and could be undertaken as minor, non-material changes.<sup>26</sup>

## 5. Conclusions

### *Summary*

- 5.1 The Georgeham Parish Neighbourhood Development Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the GPNP, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a small number of policies to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### *The Referendum and its Area*

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The GPNP as modified has no policy or proposal which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

### *Concluding Comments*

- 5.4 The Parish Council and voluntary contributors are to be commended for their efforts in producing a comprehensive Plan which is professionally presented with excellent accompanying documentation and a format which is worthy of its role as part of the Development Plan. It is an extremely well structured and informative Plan which I enjoyed examining. The associated papers were exemplary. The high quality of the Plan is demonstrated by the small number of recommended modifications (necessary to meet the Basic Conditions) to only seven of the twenty six policies. With those modifications, the GPNP will make a positive contribution to the Development Plan for the area and should enable the unique coastal and rural character and appearance of Georgeham Parish to be maintained.

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<sup>26</sup> PPG Reference ID: 41-106-20190509.

*Andrew Mead*

Examiner

## Appendix: Modifications

Proposed modification no. (PM)	Page no./ other reference	Modification
PM1	Policy SC3	Add a final sentence:  <b>“Opportunities to deliver new or enhanced rights of way identified on the Aspirational Map will be supported.”</b>
PM2	Policy H1	Delete the first two sentence of the policy and replace with:  <b>“The development of new housing within the Plan area will be permitted for principal residence occupancy only, supported by the most effective legally binding method to ensure principal residence occupancy. New housing includes like for like replacement dwellings. Occupiers of homes, etc....”.</b>
PM3	Policy BE9	Add a footnote to explain “existing complex”:  <b>“Such as a cluster of holiday cottages which may wish to add or extend facilities like a games room or covered swimming pool; or building a sports pavilion at a playing field.”</b>
PM4	Policy NE3	Delete the title and replace with: <b>“Local Green Spaces”</b> .  Delete the policy and replace with:  <b>“Local Green Spaces (LGS) are defined at: The Rabbit Field, Croyde; Croyde Village Green; Georgeham Village Car Park; Georgeham Recreation Ground and Georgeham Glebefield and Green. Policies for managing development within the LGS should be consistent with those for the Green Belt and development should not be approved except in very special circumstances. (See the Local Green Space Compliance Policy Statement, etc ... )”.</b>
PM5	Policy NE4	Delete criterion a) from the policy and add to the objectives in paragraph 6.3.1:  <b>“h) Pursue the highest aspirational standards of energy efficient guidelines</b>

Proposed modification no. (PM)	Page no./ other reference	Modification
		<p><b>applicable at the time of submitting the planning application."</b></p> <p>Delete the title and replace with: <b>"Small Scale Energy Efficiency"</b>.</p>
PM6	Policy ED2	Criterion a) insert: "... an existing <b>agricultural</b> complex ...".
PM7	Policy ED2	<p>Delete criterion b) and replace with:</p> <p><b>"b) the proposal would not have an unacceptable impact on local roads and opportunities are taken for sustainable travel."</b></p>
PM8	Policy ED4	Amend criterion c) to: "... whether it is <b>a temporary or permanent facility, ...</b> ".