

Georgeham Parish
Neighbourhood Plan
2021 – 2031
Supplementary Policy Documents

May 2021

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A Executive Summary

1 Introduction

1.1 What is a Neighbourhood Plan?

- 1.1.1 A Neighbourhood Plan is a community-led framework for guiding future development, regeneration and conservation of an area:
- It is about the use and development of land.
 - It becomes part of the statutory development plan for the District.
 - It must comply with EU Legislation; have regard to National Planning Policy and comply with Strategic Local Planning Policy.
 - It requires community engagement and robust evidence to support it.
 - It reflects issues which are particular to the neighbourhood, in this case, Georgeham Parish.

1.2 What it cannot do

- 1.2.1
- It cannot prevent all future development but can still resist or guide inappropriate development.
 - It cannot deal with issues outside the scope of land management such as traffic issues.
 - It does not need to repeat what is already in the Local Plan.

1.3 The Georgeham Parish Neighbourhood Plan

- 1.3.1 The Georgeham Parish Neighbourhood Plan aims to add detail to the Torridge and North Devon Local Plan in order to reflect the aspirations for the future of the parish by its residents and to address issues particular to the community.

- 1.3.2 These aspirations are encapsulated in the Plan's vision statement:

“The Georgeham Parish Neighbourhood Plan’s vision 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”

- 1.3.3 The Georgeham Parish Neighbourhood Plan document is divided into sections. The first section describes the parish in broad terms, dealing with its history, amenities, environment, housing and economy. It briefly states what approach has been taken in writing the plan.

- 1.3.4 This is followed by sections detailing the Plan's objectives and policies. These follow the National and Locality Plan Sustainability Agenda and will last until 2031 (the same as the Locality Plan), although they can be reviewed and changed as required.

1.4 Consultation

- 1.4.1 Before the Plan is submitted to the authorities for scrutiny, local people, organisations and other agencies are asked for their written comments. The usual six-week consultation period was extended to eight weeks because of the pandemic. All comments received are considered and may be incorporated into the Plan.

1.5 Submission to the authorities

- 1.5.1 Once the consultation period is concluded and any changes made, the Plan is submitted to the Local Authority, who will submit it for Independent Examination. The Independent Examiner will ensure that proper processes have been followed, and that the Plan meets basic conditions. At this stage further modifications may need to be made.
- 1.5.2 The final Plan is subject to public referendum. If more than 50% of those who vote in the parish accept the Plan, it is adopted. It then forms part of the development plan, which forms a key part of adopted planning policy for the area.

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2 Social and Community

2.1 Social and Community objectives of the Plan

- 2.1.2 To preserve and enhance the amenities, services and facilities which contribute to the resilience, quality of life and enjoyment of the community and its visitors.

2.2 Social and Community policies

SC1: Community facilities [1]

Proposals for the development or change of use of existing community facilities will only be supported where reasonable and sustained attempts have been unable to secure their continued social, economic and/or environmental use, for example, by providing evidence that the site or facility has been placed on the open market at a reasonable price for at least a year.

In considering the acceptability of such proposals, special regard will be given to the desirability of preserving the spaces, buildings or their settings, or any feature of special architectural or historic interest which they possess.

SC2: Education

The Plan recognises the central importance of Georgeham Primary School to the long-term character and viability of the community. Proposals for the development and/or expansion of the school will be supported subject to meeting relevant policies relating to the built environment.

SC3: Walking, cycling and riding

When any new development is proposed, it should provide facilities for walking, cycling and riding, to encourage access between the development and local amenities by non-motorised means, as well as for recreational purposes. Developments which would affect the existing rights of way shown in the map on page 93 of the Plan document should not result in their use being less safe, less convenient or less attractive.

SC4: Loss of sports and recreation facilities

Development that results in the loss of community facilities and public spaces currently used for sports or recreation (including areas where ownership is not defined), or that results in any harm to their character, setting, safety, accessibility, appearance, general quality and amenity value, will only be permitted if they are replaced by community facilities of equal or higher quality, and can be provided on the same or an equally (or more) suitable and accessible site within the area.

3 Housing

3.1 Housing objectives

- 3.1.1 The Plan aims to meet the housing needs of local people, to bring greater balance to the local housing market, to create new opportunities for people to live and work in the area, and to strengthen the community and local economy. In doing so, it strives to:

- a) Safeguard the sustainability of the settlements in the parish, whose communities risk being

[1] Community facilities encompass a wide range of local facilities and services accessible to members of the community including schools, libraries, shops, healthcare facilities, places of worship, meeting halls, public houses, sports facilities and public open spaces. The Localism Act 2011 introduced provision to help communities safeguard land and buildings serving a community purpose. Assets of Community Value (ACVs) can be nominated if they are of interest socially (such as for sport, culture or recreational uses) or increase the well-being of the community now or in the future. A community group (such as a society, parish council, neighbourhood forum, not-for-profit organisation, or a group of at least 21 individuals) that is locally connected to the area can nominate an asset to the local authority.

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eroded by the number of properties that are not permanently occupied, and to limit the provision of large multi-occupant holiday lets.

- b) Contribute to meeting the local demand for affordable and principal residence housing so that the parish continues to be a place where people of all ages can live and work.
- c) Encourage building development which contributes to the balance of housing stock in terms of type and tenure, and is socially inclusive.
- d) Ensure the proper management of any development following the commitment of all allocated sites, so that any such development makes the maximum possible contribution to redressing the balance between principal residency and holiday accommodation.

3.2 Housing policies

H1: Principal residence occupancy [2]

Land identified for the development of new housing within the villages' development boundaries will be permitted for principal residence occupancy only, supported by the most effective legally-binding method to ensure principal residence occupancy. New housing excludes like-for-like replacement dwellings. Occupiers of homes with a principal residence occupancy condition or obligation are required to keep proof that they are satisfying the condition and produce this to the District Council if required. See Neighbourhood Plan, Section 17, pages 91-94 for more detail.

H2: Housing developments

Proposals for housing and mixed-use developments within the villages' development boundaries that result in a net increase of six or more dwellings will be subjected to the following criteria:

- a) That affordable housing should be provided on the same site as any open market housing, and
- b) That the affordable dwellings should be occupied by people whose housing need meets the criteria set by the Georgeham Parish Community Land Trust and/or the local authority Housing Register.

H3: Rural exception sites [3]

Development land of one hectare or less will be considered for affordable housing development outside the development boundary subject to the following criteria:

- a) The purpose of the development should be to redress the balance of housing stock in the area available for local residents, in terms of size of units, socially affordable price, and tenure, and
- b) The number, type, size, mix and tenure of dwellings should reflect needs identified by the 2019 Housing Needs Survey, or any future surveys which may update the 2019 survey.

H4: Balancing housing supply

Proposals to change housing use from residential (use class C3) to holiday let (*sui generis*) will be permitted only where it can be demonstrated that:

- a) Sufficient parking space can be provided within the curtilage of the proposed holiday let to ensure that no additional on-street parking will be necessary, and
- b) There are no significant impacts on local amenity for nearby residents in terms of noise,

[2] A principal residence is the occupants' sole or main residence, where they spend most of their time when not working away from home. The condition requires that residence is the primary residence of those entitled to occupy it.

[3] Rural exception sites are small sites for affordable homes in perpetuity in areas that would not normally be used for housing. They seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example, where essential to enable the delivery of affordable units without grant funding.

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disturbance or traffic generation, and

- c) Proposals for the provision of new purpose-built holiday accommodation must demonstrate that there is a need which cannot be met by existing provision in the parish.

H5: Housing density

The housing density of all sites, including infill, backland [4] or windfall sites, should result in development which is in character with its immediate surroundings.

4 The Built Environment

4.1 Built Environment objectives

4.1.1 The Plan aims to:

- a) Recognise and maintain the quality and distinctive characters of the built environment, and aspire to identify design principles which can be developed into Design Guides for the parish.
- b) Ensure that any new housing and/or extensions respect the established vernacular of the locality in terms of the area's history, its building styles and materials; and, where possible, enhance and protect designated listed buildings, in accordance with statutory obligations.
- c) Identify and protect the historic cores of the villages and hamlets, and recognise the importance of individual components of building design which contribute to the distinctive character of different parts of the parish (see Croyde Character Area Assessment, Section 13, pages 64-77 of the Plan; and Georgeham Character Area Assessment, Section 15, pages 83-88 of the Plan).
- d) Conserve and, where possible, enhance the traditional banks, hedges and boundaries, including streams and run-off gullies, which contribute to the character of the parish, and recognise their importance to the environment; and build new banks and traditional boundaries where opportunities present, observing statutory guidance.
- e) Acknowledge that these boundaries and buildings act also to frame, conserve and enhance open spaces and fields, contributing to the quality of the North Devon Coast Area of Outstanding Natural Beauty.
- f) Maintain the characteristic qualities of the curtilage patterns which exist in the parish settlements by ensuring that developments have elements of green space such as garden areas, verges and hedges as part of the design.
- g) Reduce waste, encourage reuse and recycling and prevent pollution.
- h) Promote repurposing, retro-fitting and reuse of materials in building projects to minimise waste and impact on the environment, and to enhance energy efficiency.

4.2 Built Environment policies

BE1: New developments

New developments must respect the density, volume, height, street lines and roof lines (excluding chimneys) of the nearby streetscape, and use appropriate materials, in line with Local Plan policy DM04, and complement key features in parish character area appraisals, and the special character of the AONB.

BE2: Replacement buildings

The gross internal area of any replacement building within the designated character areas (see maps, pages 96-97 of the Plan), will not exceed the size of the existing building.

[4] Backland development refers to development of sites attached to existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.

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BE3: Boundary treatments

Any new developments, renovations or extensions to existing properties, should incorporate boundary treatments which reflect the local design features of the nearby streetscapes. Where the streetscape shows an open frontage, this should be maintained. Where possible, banks and hedges should be repaired, maintained or built to conserve or enhance the landscape. In exceptional circumstances, where development fronts a road, an existing bank should be repositioned to create a suitable access or footpath, in accordance with best practice and professional guidance.

BE4: Listed buildings, Conservation Areas and Character Areas

Where a proposal affects the setting of a listed building or has impact on a Conservation Area or Character Area, it will be expected to demonstrate how it will contribute positively to the quality of the character of the area and that environment.

BE5: Applications outside the development boundaries

Proposals for development outside the development boundaries should demonstrate and justify why it needs to be located there. Rural exception development on the fringes of existing settlements should comply with policy H3 ([page 5](#) of this document), and contribute positively to the appearance of the settlement when viewed from the surrounding countryside.

Proposals for all new agricultural buildings outside the development boundaries of the villages should comply with policy ED2 ([page 9](#) of this document).

BE6: Extensions to existing properties

- a) Applications for extensions and additions to existing properties will be considered in the context of the housing and built environment objectives. In addition, it will be a requirement that the property has adequate off-street parking, suitable for the number of people who could occupy the property, and
- b) The plans ensure that the extension is built proportionate to the curtilage, retaining green space which contributes to the sustainability of the natural environment and the historic character of the settlement, such as including traditional Devon banks and hedges.

BE7: Other provisions

All proposed residential and commercial developments will be required to demonstrate that they provide:

- a) Refuse and recycling storage within the curtilage which is securely covered to protect from wind, seagulls, foxes, rodents and other pests, and
- b) Facilities for storing garden furniture, tools, bicycles, surfboards and wetsuits, etc.

BE8: Disturbance and pollution

Developments which are likely to generate disturbance by either noise, light, fumes or dust must be capable of mitigation, and be mitigated adequately. Regard should be given to the amenities and privacy of surrounding properties, including the environmental effects of light spillage. The light spill of indoor and outdoor facilities in open areas would be considered detrimental to the environment ^[5].

BE9: New recreational and sporting facilities

New and ancillary indoor facilities supporting recreational and/or sporting provision should, where practicable, be accommodated in existing buildings that are of a form, bulk and general design in keeping with their surroundings. Where a new building is a functional requirement of the proposal it should be in or adjacent to a settlement or an existing complex.

[5] Mitigation of light spillage, for example, could include the use of non-reflective or one-way glass.

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Proposals for stables will be supported provided they are located in or adjacent to an existing business or they utilise existing buildings that are in keeping with their surroundings.

5 The Natural Environment

5.1 Natural Environment objectives

5.1.1 The Plan aims to:

- a) Safeguard the environmental resources of the coast and countryside in the parish, so that its special character and quality may be available for the enjoyment, appreciation and recreational use of the resident community and visitors for this and future generations.
- b) Protect aspects of the natural environment that provide habitats for local flora and fauna, and ensure that the value of the natural environment is given due weight when applications for development are considered. The Plan aims to achieve biodiversity net gain on all development applications.
- c) Retain and improve open areas within settlements that have amenity, environmental or other value. This includes green fingers, corridors or wedges which enable the countryside to penetrate built-up areas, helping to maintain a rural character and appearance and to provide wildlife corridors which promote sustained biodiversity in addition to resilience to climate change.
- d) Protect and, where practicable, extend the rights of way network, which is particularly important in facilitating access to and appreciation of the countryside, as well as providing links between settlements, green spaces and the coast.
- e) Safeguard trees, woodland, hedgerows and Devon banks which make a significant contribution to the environment and character of the area.
- f) Pursue an agenda for managing the effects of climate change (see the Climate and Wildlife Emergency Group Submission, Section 12, pages 60-63 of the Plan document).
- g) Protect the proposed designated green spaces described in the Green Space Policy Compliance Statement, Section 9, pages 30-36 of the Plan.

5.2 Natural Environment policies

NE1: Landscape spaces and open spaces

Development proposals will be supported where they present a Landscape and Visual Impact Assessment or Appraisal which demonstrates that there would be no adverse landscape or environment impact; or that:

- a) The benefits would outweigh any adverse impact and that harm is mitigated; and
- b) Opportunities have been identified and taken to enhance the landscape spaces, for example, by tree planting, creation of hedgerows and Devon banks; and
- c) Opportunities have been identified and taken to eliminate noise and light pollution, blend in with local topography and respect the landscape character and key views (identified in the Plan in Section 11, pages 45-59, and on the map, page 96), and not interrupt skylines or ridges.

NE2: Flora, fauna and forestation

Proposals which incorporate conservation and/or appropriate habitat enhancement to improve biodiversity and achieve sustained biodiversity net gain will be supported.

Development should retain and, where possible, enhance the setting of existing trees, woodland, hedgerows and Devon banks which make a significant contribution to the character of the landscape, settlements, nature conservation, local amenity or environmental character of their surroundings.

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NE3: Green spaces within settlements

Policies for managing development within a Local Green Space should be consistent with those for Green Belts (see the Plan's Green Space Policy Compliance Statement, Section 9, pages 30-36).

NE4: Energy efficiency

New development, including rebuilds and extensions, in the parish should demonstrate:

- a) How the highest aspirational standards of energy efficiency guidelines applicable at the time have been pursued; and
- b) How opportunities have been identified and taken to incorporate small-scale renewable energy solutions which suit the needs and respect the character of the building and local landscape, such as solar panels, heat pumps and other conservation measures.

With the exception of wind turbines, proposals by the community or businesses for stand-alone renewable and other low carbon energy schemes will be supported if their impacts are (or can be) made acceptable.

6 Economic Development

6.1 Economic Development objectives

6.1.1 The Plan aims to:

- a) Provide support for small businesses that will contribute to a resilient local economy;
- b) Encourage a diverse range of businesses that meet the needs of residents and visitors and increase rural employment;
- c) Support agriculture within the area, in order to enhance economic diversity, productive capacity and rural employment;
- d) Ensure that development related to the tourism industry has economic, social and environmental benefits for the North Devon Coast AONB and surrounding area.

6.2 Economic Development policies

ED1: Community workspace [6]

Proposals for small community workspace development and employment will be supported both within or adjoining the development boundaries, subject to other Development Plan policies.

ED2: Development on, and development of, agricultural land

Proposals for any development of, or on, agricultural land which is reasonably necessary for the purposes of agriculture within that unit will be supported provided that:

- a) It is sited, where practical, in or adjacent to an existing complex (the immediate boundary of the existing buildings) and, where practicable, utilises existing buildings and services, such as electricity and water supplies, and
- b) Where the proposals will generate a significant demand for travel, they can be served by public transport, walking and cycling, and
- c) They make a continuing contribution to the economic viability of an existing farm unit, and
- d) The plans demonstrate how the access to the new development relates to the existing buildings and services, and to the public highway, and

[6] Community workspaces, sometimes known as work hubs, allow small and micro businesses to share space and resources on a flexible basis. They are suitable for the needs of micro and growing businesses, providing business support and a collaborative environment. At their best, open workspaces support economic growth and the regeneration of neighbourhoods, help address disadvantage, and offer a lifeline to the area's creative sector. They are key to maintaining the dynamism and inclusivity of the local economy and cultural life.

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e) The proposals would not harm the AONB's special landscape character.

ED3: Rural business development

Proposals which contribute to the variety, growth and expansion of businesses in rural areas through the conversion of existing buildings will be supported, subject to policies contained in other sections of this Plan.

ED4: Camping and caravan sites

Proposals for the development of land, or for existing camping or caravan sites – including extension of opening times – will be supported provided that:

- a) There will not be significant harm to the character of the countryside, and
- b) The layout of such units will be required to avoid a rigid pattern which would not be in keeping with the surroundings, and shall have planting to minimise and assimilate the camping activity into the natural landscape, and
- c) Ancillary facilities to serve visitors staying on the site should seek to blend sympathetically with the landscape and surroundings, whether it is temporary or permanent, and avoid noise or other nuisance to neighbours, and
- d) On camping and caravan sites, a seasonal restriction will be sought to prevent identifiable harm to the character and amenity of the countryside which arises from year-round occupation, and
- e) All camping and caravan sites should have up-to-date and relevant site licences and operate with a pitch density appropriate to the size of the site, positioning pitches in such a way that they do not affect rights of way.

B Basic Conditions Statement

1 Legal requirements

- 1.1 The statement has been prepared by the Georgeham Parish steering group on behalf of Georgeham Parish Council to accompany its submission to North Devon District Council of its Georgeham Neighbourhood Development Plan under Section 15 (1) of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.2 The Neighbourhood Plan has been prepared by the Georgeham Parish Council, a qualifying body, for the area covering the designated Parish of Georgeham, as designated by North Devon District Council on 7 December 2015.
- 1.3 The Plan relates to planning matters (the use and development of land) in the designated neighbourhood area from the period 2021 to 2031. It does not contain policies relating to excluded development as laid out in the regulations.
- 1.4 The following statement will address each of the four basic conditions required by the regulations and explains how the Neighbourhood Plan meets the requirement of paragraph 8 of schedule 4B to the Town and Country Planning Act (as amended).
- 1.5 A Neighbourhood Plan must meet the following basic conditions in order to proceed to referendum:
 - a) Has regard to national policies and advice contained in guidance issued by the Secretary of State
 - b) Contributes to the achievement of sustainable development
 - c) Is in general conformity with the strategic policies of the development plan for the area
 - d) Is compatible with European Union and European Convention on Human Rights obligations.

2 Background

- 2.1 In response to the powers given to Parish Councils in the Localism Act of 2011, Georgeham Parish Council applied to North Devon Council for permission to produce a Neighbourhood Plan (see letter, [page 25](#)), North Devon Council agreed (see designation notice, [page 26](#)), and Georgeham Parish Council became the registered lead body for the development of the Plan.
- 2.2 Initially a sub-committee was set up, under the leadership of Councillor Verlie Meek, who has been chiefly responsible for driving the project since then, until her retirement from the Council in May 2019, when the leadership of the steering group passed to Councillor Margaret Beaumont.
- 2.3 The membership of the steering group has varied over the years with many members of the community contributing work on various aspects of the plan.
- 2.4 A Consultation Statement has been prepared (see [page 24](#) of this document) which details the extent and scope of the consultations and contributions which have informed the development of the Plan.
- 2.5 Georgeham Parish Council is particularly grateful to North Devon Council for its generous support and guidance to the steering group in the preparation of the document.

3 National Planning Policy Framework

- 3.1 The Neighbourhood Plan has been prepared having regard to the policies set out in the National Planning Policy Framework (NPPF) of February 2019. It also has regard to the National Planning Policy Guidance (NPPG) published by the Government in April 2014 and last updated in September 2020 in relation to the formation of Neighbourhood Plans.
- 3.2 Table 1 overleaf sets out a summary of how each policy has regard to the NPPF. The paragraphs referred to are considered to be the most relevant to the policy and are not intended to be a comprehensive list of every paragraph.

B Basic Conditions Statement

3.3

| Table 1: How the Georgeham Parish Neighbourhood Plan (GPNP) has regard to national policies | | |
|---------------------------------------------------------------------------------------------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GPNP policy and title | Relevant NPPF paragraphs | Comment on whether the GPNP has regard to National Planning Policy Framework (NPPF) policy |
| Proposed Social and Community policies | | |
| SC1: Community facilities | 83, 92, 127 | Has regard to NPPF by aiming to meet the needs of present and future generations through safeguarding accessible services in and close to the village centres where there are key facilities. In considering the acceptability of such proposals, special regard will be given to the desirability of preserving the spaces, buildings or their settings, or any feature of special architectural or historic interest which they possess. |
| SC2: Education | 94 | Has regard to NPPF by recognising the importance of the school to the sustainability of the community and its capacity to meet the needs of existing and future members. |
| SC3: Walking, cycling and riding | 91, 98, 102 | Has regard to the aim of achieving healthy, inclusive and safe access between developments and community facilities. |
| SC4: Loss of facilities | 83, 92, 97 | Has regard to NPPF by planning to guard against the unnecessary loss of any valued facilities and services. |
| Proposed Housing policies | | |
| H1: Permanent residency | 61 | Has regard to the intention of paragraph 61 of the NPPF that planning policy should reflect the size, type and tenure of housing needed for different groups in the local community. |
| H2: Housing developments | 59–63 | The GPNP is informed by the Housing Needs Survey of 2019, and the Housing Register, and the housing requirement of the plan period. Has regard to NPPF by contributing to the objective of creating mixed and balanced communities. |
| H3: Rural exception sites | 61, 77–79 | Has regard to provision of small sites responsive to identified local need, and to maintain the vitality of rural communities. |
| H4: Balancing housing supply | 61 | Paragraph 61 of the NPPF addresses the need to plan for housing stock to meet assessed local need. |
| H5: Housing density | 122 | Paragraph 122 states that planning decisions should maintain an area's prevailing character and setting, whilst taking account of the capacity of infrastructure and services and promote sustainable travel modes. |
| Proposed Built Environment policies | | |
| BE1: New developments | 124–126 | Has regard to NPPF by ensuring the scale of a development and its design will integrate well with the local area. |
| BE2: Replacement buildings | 122, 127 | Has regard to paragraphs 122, and 127 by making development acceptable to communities by integrating new building within the character of existing development. |
| BE3: Boundary treatments | 91, 151, 170 | Has regard to mitigating against climate change; enhancing networks of habitats and wildlife corridors. Moving banks to create new footpaths has regard to paragraph 91 to achieve healthy, inclusive and safe places to live. |
| BE4: Listed buildings, Conservation Areas and Character Areas | 127 | Has regard to the aim of creating buildings and places which are well designed, respectful of prevailing character and acceptable to the local community. |
| BE5: Applications outside the development boundaries | 79, 83 | Has regard to NPPF policy to avoid the development of isolated homes in the countryside, whilst supporting the development and diversification of agricultural and other land-based rural businesses which respect the character of the countryside. |

B Basic Conditions Statement

| | | |
|------------------------------------------------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BE6: Extensions to existing properties | 102, 118, 127, 150 | Has regard to paragraph 102 on parking and paragraphs 118, 127 and 150 which require that policies take into account prevailing character and setting (including gardens), promoting regeneration and change. Takes into account the importance of securing well-designed, attractive and healthy places, achieving environment gains and contributing to green infrastructure. |
| BE7: Other provisions | 127 | Has regard to the aim that developments will function well and add to the overall quality of the area, not just for the short term. The NPPF does not specifically mention the issues covered by policy BE7, but the thrust of detailed good design is encapsulated in paragraph 127 which refers to the functionality and attractiveness of developments. |
| BE8: Disturbance and pollution | 170, 173, 180 | NPPF states that planning decisions should 'prevent unacceptable levels of ... noise pollution' and 'limit the impact of light pollution ... on local amenity, intrinsically dark landscapes and nature conservation'. It recommends that major development within a Heritage Coast is unlikely to be appropriate. |
| BE9: New recreational and sporting facilities | 172, 173 | Has regard to the NPPF by conserving wildlife and cultural heritage, limiting the scale of development in an AONB, and respecting the special character of the Heritage Coast. |
| Proposed Natural Environment policies | | |
| NE1: Landscape spaces and open spaces | 170, 180 | Has regard to NPPF policy to protect or enhance the natural environment. |
| NE2: Flora, fauna and forestation | 170, 174 | Has regard to providing net gains for biodiversity, mitigates the effects of climate change, promotes conservation, restoration and enhancement of habitats and ecological networks. |
| NE3: Green spaces within settlements | 99–101 | Relates to the application of green belt policies and safeguards the open spaces which are used for sport, social events and as rights of way. Has regard to NPPF's approach to the designation of local green spaces which promote healthy and safe communities. |
| NE4: Energy efficiency | 148–151 | Has regard to NPPF policies which require planning decisions to support a low carbon future and reduce greenhouse gas emissions. |
| Proposed Economic Development policies | | |
| ED1: Community workspace | 80, 83, 84 | Has regard to NPPF policy by helping to create conditions where new businesses can develop by sharing space, resources and expertise. The GPNP economic vision is to increase the mix of business in the area. |
| ED2: Development on, and development of, agricultural land | 84, 170 | Has regard to NPPF policy to support diversification of agricultural businesses and contribute to the economic viability of an existing farm unit, provided that proposals are sensitive to their surroundings and do not have an unacceptable impact on local roads. |
| ED3: Rural business development | 83 | Has regard to NPPF policy by supporting business development in the rural economy. |
| ED4: Camping and caravan sites | 83, 84, 170, 172, 173 | Has regard to NPPF policy by aiming to ensure campsites do not have an unacceptable impact on local roads; are sensitive to their surroundings and that sites are physically well-related to existing settlements. Conserves and enhances the natural environment in Heritage Coast and AONB areas. |

4 Conformity to the strategic policies of the Local Development Plan

- 4.1 The Neighbourhood Plan has been prepared to ensure that it is in general conformity to the development plan for the area. The current development plan is the North Devon and Torridge Local Plan 2011 – 2031 adopted in October 2018. Table 2 overleaf sets out how each policy is in general conformity with the North Devon and Torridge Plan 2011 – 2031. Local Plan policies ST01, ST07 and ST09 are applicable to all the Neighbourhood Plan policies.

B Basic Conditions Statement

4.2

| Table 2: How Georgeham Parish Neighbourhood Plan (GPNP) policies conform to the North Devon and Torrridge Plan 2011 2031 | | |
|--------------------------------------------------------------------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| GPNP policy and title | Relevant Local Plan policy | Comment on conformity |
| Proposed Social and Community policies | | |
| SC1: Community facilities | ST12, ST22 | Focuses on the community facilities of the parish, seeking to secure their longer term future for community benefit, in conformity with ST12 and ST22. |
| SC2: Education | ST22, GEO | Contributes to making local communities more sustainable through expansion of the primary school. |
| SC3: Walking, cycling and riding | ST10, DM06 | Conforms to policies to encourage the use of sustainable modes of transport. |
| SC4: Loss of facilities | ST12, ST22 | Supports Local Plan policy to preserve community services and facilities unless there is compelling evidence to show that they are no longer commercially viable or required to meet the needs of the local community. |
| Proposed Housing policies | | |
| H1: Permanent residence | ST17 | Conforms to the aim that the scale and mix of new development should reflect identified housing need by contributing to a balanced local housing market. |
| H2: Housing developments | ST18 | Conforms to the aim of the Local Plan that affordable housing provision should be part of any market development. |
| H3: Rural exception sites | ST07, ST19 | Supports well-related placement of exception sites and supports development to meet local housing need. |
| H4: Balancing housing supply | ST13, ST17, DM25 | Conforms to the aim of creating a balanced local housing market suitable for local needs and restrictions on over-development, while promoting sustainable tourism. |
| H5: Housing density | ST04, DM04 | Conforms to the Local Plan by respecting overall scale, density, massing, height and landscape. |
| Proposed Built Environment policies | | |
| BE1: New developments | ST04, ST14, DM04 | Conforms to the design principles in the local plan. |
| BE2: Replacement buildings | ST04, ST07, ST17, DM04, DM26 | Conforms to design principles concerning building size and scale. Policy BE2 sets out to safeguard smaller properties in the parish from inappropriate extension or replacement. It is in general conformity with Local Plan policy. |
| BE3: Boundary treatments | ST04, DM04, GEO | Conforms to general design policy and supports the aim of achieving high quality, sustainable design which responds the characteristics of the site and surrounding area. |
| BE4: Listed buildings, Conservation Areas and Character Areas | ST04, ST15, DM04 | Conforms to good design principles and the intention to retain and enhance historic character. |
| BE5: Applications outside the development boundaries | ST07 | Conforms to rural spatial strategy in local plan and conforms to policy relating to rural exception sites. |
| BE6: Extensions to existing properties | ST04, ST14 | Conforms to strategy relating to scale and mix in the local plan and conforms to the planned aim to conserve biodiversity. |
| BE7: Other provisions | Paragraphs 13.28, 13.29 | Policy BE7 is in general conformity with paragraphs 13.28 and 13.29 of the Local Plan, which indicates that all development proposals should incorporate facilities for storage and collection of waste. |

B Basic Conditions Statement

| | | |
|------------------------------------------------------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BE8: Disturbance and pollution | ST01, DM01, DM02 | Conforms to the local plan policy on environment protection and amenity considerations. |
| BE9: New recreational and sporting facilities | ST04, ST07, ST14, DM04, DM08A, DM16 | Conforms to the policies of the Local Plan by following the design principles of scale, relationship to buildings and landscape features. |
| Proposed Natural Environment policies | | |
| NE1: Landscape spaces and open spaces | ST14, DM08, DM08A | Conforms to Local Plan policy Enhancing Environmental Assets, and the Management policy to conserve and protect biodiversity. |
| NE2: Flora, fauna and forestation | ST14, DM08, DM08A | Conforms to Local Plan policies to enhance the environmental assets and protect biodiversity. |
| NE3: Green spaces within settlements | ST09, ST14 | Conforms to Local Plan policies to safeguard green infrastructure, enhance environmental assets and protect biodiversity and geodiversity commensurate with their status and importance. |
| NE4: Energy efficiency | ST02, ST16 | Contributes to the aim to reduce greenhouse gas emissions by achieving high standards of design. |
| Proposed Economic Development policies | | |
| ED1: Community workspace | ST07, ST11, DM12 | Conforms to Local Plan policies on delivering employment and economic development. |
| ED2: Development on, and development of, agricultural land | ST10, ST14, DM14 | Conforms to the Local Plan policy to support agricultural businesses. |
| ED3: Rural business development | ST07, ST11, DM14 | Conforms to the Local Plan policy to encourage business diversification. |
| ED4: Camping and caravan sites | ST04, ST13, ST08A | Conforms to policies which relate to development beyond village centres, and to the scale of developments and their impact on road and environmental assets. |

5. Contribution to the achievement of sustainable development

- 5.1** A Neighbourhood Plan must take into account the need to contribute to the achievement of sustainable development. This involves working to address the three separate strands of sustainability: economic, social and environmental.
- 5.2** The vision and objectives of the Georgeham Parish Neighbourhood Plan are set out in Section 2, pages 4-5, of the Plan document.
- 5.3** The Plan aims to maintain as much of the existing natural landscape and do as little harm to the environment as possible. It strives to improve existing amenities and to encourage tourism without numbers overwhelming the community or degrading the natural landscape and environment.
- 5.4** The pressing concern is to balance the needs of tourism against the need for a strong resilient resident community; tourists are attracted to the area partly because it is welcoming, safe place.
- 5.5** To be sustainable, the community needs to be economically viable. The Plan aims to support and encourage a variety of economic enterprises.
- 5.6** The parish is situated in an Area of Outstanding Natural Beauty, it is part of the North Devon Biosphere Reserve and has rare species, outstanding coastal landscape and clean bathing water at beautiful beaches. All this is precious both to those who live here, and to those who visit. Whilst wanting to share this natural beauty, the Plan recognises that it is a fragile environment, and that land use must be carefully husbanded to preserve the environment for future generations.

B Basic Conditions Statement (continued)

5.7 Table 3 below sets out an assessment of each policy of the Plan and how it impacts on each of the three strands of sustainability: social, economic and environmental.

5.8

Table 3: How each policy of the Georgeham Parish Neighbourhood Plan (GPNP) impacts on the three pillars of sustainability – social, economic and environmental

| GPNP policy and title | Sustainability compatability | | | Comment |
|-----------------------------------------------|------------------------------|--------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Economic | Social | Environmental | |
| Proposed Social and Community policies | | | | |
| SC1: Community facilities | + | ++ | + | Facilities including school, shops, eating and drinking places, places of worship, and social gathering, inside or out contribute to health, social and cultural well-being; and bring economic benefits to the area also. |
| SC2: Education | + | ++ | - | Provides for present and future generations who live and work in the area and contributes to protecting the environment by maintaining a vibrant social and cultural life, which in turn supports the local economy. |
| SC3: Walking, cycling and riding | ++ | ++ | ++ | This policy encourages active travel within the parish for residents and visitors alike, promoting a healthy and safe community and helping to maintain and enhance the environment. Active travel also supports local businesses. |
| SC4: Loss of facilities | + | ++ | ++ | This policy contributes to the economic value of tourism to the area; protects the social importance of facilities and open spaces, thus maintaining the overall quality of the environment. |
| Proposed Housing policies | | | | |
| H1: Permanent residence | + | ++ | + | This policy is designed to maintain a balance between the expansion of tourism, and the need to maintain a vibrant community, which forms the basis of the attraction of visitors to this parish. The policy seeks to address the number of empty properties in the parish during winter months, thereby improving the social and economic benefits of having dwellings occupied all year. |
| H2: Housing developments | + | ++ | - | This policy addresses the need for a balance in housing type and tenure to attract people of all ages and incomes and social background who can live and work here. This supports the local economy. |
| H3: Rural exception sites | + | ++ | - | This policy protects the environment by limiting development to areas least destructive to the environment, whilst providing housing to meet identified social need; for people who will support the continued use of community facilities. |
| H4: Balancing housing supply | + | + | + | This policy contributes to creating a balance between the economic drivers of the tourism trade, and the needs of the local resident community, whilst also protecting against over-development of sites, and possible noise pollution and loss of environmental benefits. |
| H5: Housing density | + | + | ++ | This policy supports good design of development which maintains the economic value of the area; it has health benefits to all by protecting biodiversity and green infrastructure. |

++ Very positive impact

+ Positive Impact

- Neutral impact

B Basic Conditions Statement

| GNPN policy and title | Sustainability compatability | | | Comment |
|---------------------------------------------------------------|------------------------------|--------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Economic | Social | Environmental | |
| Proposed Built Environment policies | | | | |
| BE1: New developments | + | + | + | Good design creates better places for people to live and work; add to the quality of the environment and ensure that this parish remains an attractive place for visitors. |
| BE2: Replacement buildings | + | + | + | This policy seeks to support housing regeneration/ modernisation without damaging the character of the area through the over-development of building plots; maintaining a range of property sizes and protecting garden/ green space. It aims to provide homes for a wide demographic - singles; families and retirees. |
| BE3: Boundary treatments | + | + | ++ | The policy aims to enhance the built vernacular at the same time as protecting and improving safe access routes, benefits to the environment, wildlife corridors and green spaces. |
| BE4: Listed buildings, Conservation Areas and Character Areas | + | + | ++ | By respecting the historic environment, the attractiveness and character of the area is preserved which benefits all people who live and visit here and supports the economy. |
| BE5: Applications outside the development boundaries | + | + | + | This policy provides for development to meet housing need, when there is a shortage of suitable sites, but it respects the environment ensuring necessary protections, whilst also creating possibility for expansion in the economy. |
| BE6: Extensions to existing properties | + | + | + | Good design meets the need of people to live in healthy and attractive places; good design in this area supports the tourism economy and protects the environment. |
| BE7: Other provisions | + | + | + | This policy supports a healthy safe attractive environment to the benefit of the sustainability agenda. |
| BE8: Disturbance and pollution | + | + | + | This contributes to maintaining a balance between residential, holiday and economic needs whilst respecting the environment. |
| BE9: New recreational and sporting facilities | - | + | + | This policy supports economic and recreational developments, whilst seeking to respect and protect the environment. |
| Proposed Natural Environment policies | | | | |
| NE1: Landscape spaces and open spaces | - | + | ++ | This policy seeks to protect the environmental resources of outstanding quality which contribute to the health and well-being of the community and underpins the economy of the area. |
| NE2: Flora, fauna and forestation | - | + | ++ | This policy aims to protect the existing environmental assets of the parish and achieve environmental net gains. |
| NE3: Green spaces within settlements | - | + | ++ | This policy aims to protect green areas of particular importance to the local community, contributing to the health and well-being of the residents, visitors and the environment. |
| NE4: Energy efficiency | + | + | ++ | This policy aims to encourage the application of best available technologies to reduce energy consumption and carbon dioxide emissions, and mitigate against the effects of climate change. |

++ Very positive impact + Positive Impact - Neutral impact

B Basic Conditions Statement

| GPNP policy and title | Sustainability compatability | | | Comment |
|------------------------------------------------------------|------------------------------|--------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Economic | Social | Environmental | |
| Proposed Economic Development policies | | | | |
| ED1: Community workspace | ++ | + | - | This policy aims to create conditions in which small businesses might be encouraged to develop, increasing the resilience of the local economy. |
| ED2: Development on, and development of, agricultural land | ++ | ++ | + | This policy supports the conditions for agricultural businesses to diversify, keeping farming viable, able to manage the landscapes, and continue to protect the environment. |
| ED3: Rural business development | ++ | + | + | This policy supports and respects the contribution the farming community makes and will make, to the future of the environment, food production, and mitigation against climate change whilst adapting to changing conditions. |
| ED4: Camping and caravan sites | ++ | + | ++ | This policy strikes a balance between supporting the contribution that camp sites make to the local economy and protecting and enhancing the natural environment. |

++ Very positive impact + Positive Impact - Neutral impact

6 Compatibility with EU obligations and legislation

- 6.1 The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. Considerable emphasis has been placed throughout the consultation process to ensure that no sections of the community have been isolated or excluded.
- 6.2 A screening process was carried out by North Devon District Council which determined that the Neighbourhood Plan did not require a Strategic Environmental Assessment. North Devon District Council also determined that the Plan did not require a Habitats Regulations Assessment. (See SEA and HRA Screening Report, [page 50](#)).

C Equality Impact Assessment

1 Introduction

- 1.1 The Equality Act 2010 (the Act) places a duty on all public authorities to have regard to the need to eliminate discrimination, to advance equality of opportunity, and to foster good relations between persons who have a 'protected characteristic' and those who do not.
- 1.2 Equality Impact Assessment is the systematic analysis of a policy or policies, in order to identify the potential for an adverse impact on a particular group or community, in particular those with a protected characteristic. It is a method of assessing and recording the likely differential and/or adverse impact of a policy on people from different groups so that if a policy results in unfairness or discrimination then changes to eliminate or lessen the impact can be considered. 'Protected characteristics' are defined in the Act as age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 1.3 This document presents the results of the assessment of the Georgeham Parish Neighbourhood Plan to ensure that Georgeham Parish Council is satisfying its statutory duties in this regard.

2 Aims of the equality analysis

- 2.1 The purpose of the analysis is to increase participation and inclusion, to change the culture of public decision-making and to nurture a more proactive approach to the promotion of equality and fairness at the heart of public policy. The aim in conducting the analysis is the promotion of fairness and equality of opportunity and thus it is the outcomes that are of primary concern.
- 2.2 The sections below consider the goals and objectives of the Neighbourhood Plan and then assess the impact of policies and proposals on groups with protected characteristics.

3 Methodology

- 3.1 An assessment has been made on whether the Neighbourhood Plan has a positive, negative or neutral impact on each of the protected characteristics (in so far as data is available). A brief justification and explanation of the policies and proposals in the Plan are provided below.
- 3.2 It is important to rate the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future). The likely impact of each objective or policy within the plan has been assessed:
Positive: a positive impact or beneficial outcome.
Neutral: neither positive impact or negative outcome.
Negative: a negative impact or outcome.

4 Baseline data

- 4.1 Data for Georgeham Parish is available for the following protected characteristics: age, disability, race, religious belief, sex. Data is not readily available for the following protected characteristics: gender reassignment, pregnancy and maternity, sexual orientation. Unless stated otherwise the data source is the 2011 census. Due to Georgeham Parish being smaller in area than the Georgeham and Mortehoe ward, data for the plan area has been extrapolated from the 2011 census data to give the best estimate possible.

5 Georgeham Parish population characteristics

Total Population: 1440.

Age: 17% of the population are children aged 15 or less; 61% are in the working age groups 16-64; 22% are aged 65 plus. This means that the population has a slightly older profile than the average for England where the equivalent figures are 18%, 66% and 16%. The community loses young people when they go to university or pursue careers elsewhere. On the other hand, many young adults with families move into the community.

C Equality Impact Assessment

Sex: 49% male; 51% female.

Country of birth: 94.9% of residents were born in the UK; 2.8% were born in the EU; 2.3% were born elsewhere.

Ethnic group: 98.8% are white British/white Irish; 0.7% are mixed/multiple ethnic group; 0.5% are from other ethnic groups.

Religion: 61% Christian; 1% other religion; 29% do not have a religion; 9% did not state their religion.

Health: People living here generally experience good health with the majority describing having 'very good', 'good', or 'fair' health; 0.7% described their health as 'very bad'; 0.2% indicated that they were unable to work due to a long-term health issue or disability.

Occupancy: In the ward in 2011, 26% of dwellings had no permanent resident; 5.5% were occupied by lone pensioners; 15% by married couples; 3% by lone parents with children; two dwellings were occupied by couples in civil partnerships; 21% of dwellings had some dimension of deprivation. Now it is believed that 39% of dwellings in the parish have no permanent resident.

6 Objectives of the Neighbourhood Plan

- 6.1 The Plan's Vision sets out the requirements which are appropriate for all including those with protected characteristics to get on well together, supporting those in the community that need support and helping the community to thrive.
- 6.2 It is expected to have a positive impact on all sectors of the community but particularly on young groups using the local schools and those that may have mobility issues and/or limited or no access to a car and rely on local businesses for services.
- 6.3 All of the objectives of the Plan attempt to improve the conditions for all of the population and achieve benefits for all members of the community.
- 6.4 In each case they aim to create an environment which would also benefit persons with protected characteristics by providing an inclusive environment with an excellent vibrant community spirit where homes are well designed to suit the needs of the community.
- 6.5 It is important to the community that Georgeham Parish continues to be a friendly, inclusive, desirable place to live, retaining its independent identity and excellent services and amenities. Of equal importance is that it is safe to get around and any potential expansion contributes positively to the community and does not threaten what is so clearly valued by the community.
- 6.6 The Plan contains eight principles of importance identified by the community. These are that:
- a) The size, scale, design and use of any proposed development (whether new build, extension or conversion) is sensitive to its surroundings. In particular, development should demonstrate that it minimises adverse impacts on neighbouring residences;
 - b) There is no significant adverse impact (visual or otherwise) on the area's landscape and natural habitats. Development proposals will be expected to demonstrate how they have minimised landscape impact on the open countryside and coastline, from both the seaward and landward aspects;
 - c) Where possible, sites are screened by landform and locally appropriate features, such as trees, hedges, Devon banks and stone walls in the traditional manner of the area, and existing banks and hedges are maintained and repaired where they already exist;
 - d) On the outer fringes of the built-up settlement areas, all proposals should particularly incorporate appropriate boundary treatments;
 - e) Site access is in keeping with the surrounding landscape, with particular attention to the wider rural setting and the needs of pedestrians, cyclists and rural road use;

C Equality Impact Assessment

- f) Proposals have a positive contribution towards open spaces, respecting the amenity, recreational and wider environmental value of existing spaces and contributing to their enhancement;
- g) Development design in settlement centres is reflective of, or complementary to, the existing structures and amenity spaces of neighbouring properties;
- h) Development proposals should take account of the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment. This includes minimising the impact of noise, protecting tranquil areas prized for their amenity value and limiting the impact of artificial light pollution on local amenities, intrinsically dark landscapes and wildlife.

The principles establish how the parish proposes to deliver its Vision. Delivery will be through both planning policies and community action.

- 6.7 All 26 planning policies have been assessed and no areas of incompatibility have been identified.

7 Community consultation process

- 7.1 A detailed account of the consultation process is provided in the Consultation Statement (see Section D, [pages 24-48](#) of this document), which is submitted alongside the Neighbourhood Plan. The aims of the GPNP consultation process were:

- a) To involve as many people as possible in the Plan's development from an early stage;
- b) To ensure that consultation took place at critical points in the process using a variety of consultation techniques;
- c) To ensure that consultation was meaningful, that people felt listened to and that their input was valued; and
- d) To keep people informed of the Plan's progress at regular intervals.

- 7.2 Throughout the preparation of the Plan the steering group sought to engage with as wide a range of people as possible and were mindful to consider those that do not have access to the internet.

- 7.3 Early engagement was achieved through open meetings and workshops which sought to identify at this stage what was important to the community and what were the issues affecting the parish and its future sustainability. In addition to workshops, articles were included in *The Crydda* parish magazine that goes to every household. Two hard copy questionnaires were delivered, one to every household in the parish and the other to the Croyde Area Residents' Association. These and the evaluation of the results are in the Plan's appendices.

- 7.4 The variety of methods used to publicise the Regulation 14 pre-submission consultation were:

- a) Articles in *The Crydda*
- b) Parish and post office notice boards
- c) Use of social media such as Facebook and Twitter
- d) Use of the parish website for all relevant information
- e) Production of an Executive Summary of the Plan
- f) Hard copies of the Plan available on request
- g) Posters placed in key positions throughout the community
- h) The parish clerk's email address used to collect comments
- i) Landowners and business owners were contacted
- j) The primary school was contacted – older pupils were also encouraged to participate.
- k) Local interest groups were asked to contact their members e.g. Georgeham Parish Community Land Trust, Croyde Area Residents' Association and the local Climate Emergency Group
- l) Word of mouth – which circulates quickly in a small community.

Note: the Covid situation precluded public meetings

C Equality Impact Assessment

8 Likely impact of Plan policies on residents with protected characteristics

- 8.1 The Plan aims to create benefits for everyone who lives, works, shops, or spends leisure time in the parish. This will be achieved by:
- a) Developing new housing, particularly affordable housing, with an emphasis on smaller units;
 - b) Preserving and developing social, community and leisure facilities;
 - c) Improving access to local services and facilities;
 - d) Preserving and enhancing the quality of the environment;
 - e) Improving/maintaining access to the countryside for all through footpath protection and creation.
- 8.2 Groups with various protected characteristics will be affected in different ways by the Plan. The purpose of the analysis in this section of the assessment is to identify how various groups will be affected and if the proposals and policies in the Plan will adversely affect disproportionately those in the groups with protected characteristics.
- 8.3 Where policies in the Plan do have an impact on groups with protected characteristics, it is overwhelmingly a positive or neutral impact and not a negative one.

9 Conclusion

- 9.1 The Neighbourhood Plan provides a strategy for the development of the community and a range of policies and proposals that will benefit many parts of the local community including those with protected characteristics: older people, young people, mothers to be and young children, disabled people and those with limited mobility.
- 9.2 The Plan does not explicitly address the needs of racial or religious groups, transgender, gay or lesbian groups. It does make equal provision of affordable housing and for a range of housing to meet a variety of needs. It also seeks to preserve and develop social community, leisure facilities and retail services that will benefit these groups equally.
- 9.3 The Plan's steering group does not consider that there are any negative equality impacts that arise from the policies or proposals contained within the Plan or that it raises any issues in relation to the Human Rights Act 1998 or the Equality Act 2010.

C Equality Impact Assessment

| Policy | Protected Characteristics (PCs) | | | | | | | | | Comments |
|------------------------------------------------------------|---------------------------------|---------------|------------------------|-----------------------------------|----------------------------|----------|------------------------|----------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | 1. Age | 2. Disability | 3. Gender reassignment | 4. Marriage and civil partnership | 5. Pregnancy and maternity | 6. Race | 7. Religion and belief | 8. Sex | 9. Sexual orientation | |
| | | | | | | | | | | Within this parish PC categories 1, 2, 4 and 5 are most relevant and most affected by development |
| SC1: Community facilities | Positive | Positive | Neutral | Positive | Positive | Positive | Positive | Positive | Neutral | Protection of community facilities will benefit all those with protected characteristics. |
| SC2: Education | Positive | Neutral | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Support of the village primary school will benefit mainly those in PC 1, 4 and 5. |
| SC3: Walking, cycling and riding | Positive | Positive | Neutral | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Support of non-motorised transport is generally accepted as being one way towards sustainable living. |
| SC4: Loss of sports and recreation facilities | Positive | Positive | Neutral | Neutral | Positive | Neutral | Neutral | Neutral | Neutral | Community facilities and recreational spaces are valued by residents and visitors alike. |
| H1: Permanent residency | Positive | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Permanent housing is needed to counterbalance the proliferation of holiday accommodation. |
| H2: Housing developments | Positive | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Affordable housing within the parish is needed particularly for PC 1, 2, 4 and 5. |
| H3: Rural exception sites | Positive | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Rural land use outside the development boundaries may be supported in exceptional cases to meet identified local needs. |
| H4: Balancing housing supply | Positive | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | This policy is intended to reduce conversions to holiday lets. |
| H5: Housing density | Positive | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Most people want the density of the housing within the parish to remain much as it is. |
| BE1: New developments | Neutral | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Most people want to retain the architectural character of the housing within the parish. |
| BE2: Replacement buildings | Neutral | Positive | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Over-development of sites is viewed as undesirable but may disadvantage growing families in PC 5. |
| BE3: Boundary treatments | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | The visual impact of development in a rural parish is important to all, not just those in PCs. |
| BE4: Listed buildings, Conservation and Character Areas | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Development in a historic site is of concern to all, not just those in PCs. |
| BE5: Applications outside the development boundaries | Positive | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | There may be disadvantages to certain groups such as PC 2 and 5 in limiting such developments but the parish has development boundaries and is within an AONB. |
| BE6: Extensions to existing properties | Positive | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Over-development of sites is viewed as undesirable but may disadvantage growing families in PC 5. |
| BE7: Other provisions | Positive | Positive | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | A policy to insist on suitable storage is of benefit to all residents. |
| BE8: Disturbance and pollution | Positive | Neutral | Neutral | Neutral | Positive | Neutral | Neutral | Neutral | Neutral | Limiting disturbance and pollution is of benefit to all residents, visitors and wildlife. |
| BE9: New recreational and sporting facilities | Neutral | Neutral | Neutral | Positive | Positive | Neutral | Neutral | Neutral | Neutral | New facilities in suitable sites benefit all. |
| NE1: Landscape spaces and open spaces | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | The parish is in an AONB and the tourism economy relies on the landscape from which all benefit. |
| NE2: Flora, fauna and forestation | Positive | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Biodiversity net gain is a requirement now but does not specifically affect PC categories. |
| NE3: Green spaces within settlements | Positive | Positive | Neutral | Neutral | Positive | Neutral | Neutral | Neutral | Neutral | Local green spaces are valued by all but benefit those in PC 1, 2 and 5 especially. |
| NE4: Energy efficiency | Neutral | Neutral | Neutral | Neutral | Positive | Neutral | Neutral | Neutral | Neutral | Encouraging energy efficiency is imperative for all. |
| ED1: Community workspace | Positive | Positive | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Local serviced workspaces create opportunities for business development suited to PC 1 and 2 especially. |
| ED2: Development on, and development of, agricultural land | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Agriculture and farm diversification are still relevant in this rural parish but do not affect any specific PC group. |
| ED3: Rural business development | Positive | Neutral | Neutral | Positive | Neutral | Neutral | Neutral | Neutral | Neutral | Small scale economic development could provide employment for PC groups 1 and 4 especially. |
| ED4: Camping and caravan sites | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Neutral | Limitations on camping and caravanning help to preserve what is valued about the parish. |

D Consultation Statement

1 Background

- 1.1 In October 2015, Georgeham Parish Council decided to prepare a Neighbourhood Plan ('the Plan') for the parish. The council applied to North Devon District Council for permission to progress the Plan (see letter [overleaf](#)). This was agreed (see designation notice, [page 26](#)) and the Parish Council became the registered lead body. A sub-committee of six was set up, but it was agreed to involve as many people as possible in the process.
- 1.2 This consultation statement sets out how community consultation was undertaken and managed during the Plan preparation process. It fulfils the requirements of the Neighbourhood Planning Regulations (Section 15 (2) of Part 5 of the Regulations), setting out:
- a) Details of the persons and bodies who were consulted about the Plan
 - b) An explanation of how consultation was carried out
 - c) A summary of the main issues and concerns raised through the consultation, and
 - d) A description of how the issues and concerns have been considered and addressed.
- 1.3 Georgeham Parish Council is the qualifying body responsible for the preparation, consultation and submission of the Neighbourhood Plan. A steering group, chaired by a parish councillor, has prepared the Plan on behalf of the parish council.
- 1.4 The group has benefitted from the expertise of those with special interest and expertise in planning, the natural environment, education, housing, economic development and transport. Progress in developing the Plan was reported monthly to the parish council as a standing agenda item.

2 Stakeholder engagement

- 2.1 Much thought was given to promoting the project and engaging all stakeholders in the parish community. A website and a Facebook page were set up. An announcement and questionnaire were published in *The Crydda* parish magazine in April 2016, which is delivered to all residents. *The Crydda* questionnaire elicited 42 responses and Facebook 32.
- 2.2 In June 2016, a repeat questionnaire was delivered to all homes and known second homes. Two public meetings were held: in Croyde Village Hall on 7 June and Georgeham Village Hall on 15 June, which generated further responses.
- 2.3 Two further drop-in meetings were held in October 2016. The first, in Croyde on 6 October, focused mainly on housing. Graham Townsend, then Lead Planning Delivery Officer from North Devon Council, was guest speaker.
- 2.4 The second, in Georgeham on 13 October, was directed at local business, leisure and tourism. David Edcombe, Projects Officer from North Devon Coast Areas of Outstanding Natural Beauty, was guest speaker. More than 20 people attended each meeting but it was decided to hold a further meeting for businesses, on 26 October. Letters were also sent to all local businesses inviting input which elicited a few replies. In all, 20 responses were received from businesses, mostly from within the parish.
- 2.5 In November 2016, Croyde Area Residents' Association (CARA) conducted its own survey, because its members felt that Croyde had issues requiring specific solutions. Responses echoed those of the parish council questionnaires. A summary of the CARA's survey questionnaire can be found in Section 14, pages 78-82 of the Plan document, as can the results of a Croyde property survey, also conducted by the residents' association.
- 2.6 Outreach work within the community included an invitation to Georgeham Primary School to provide context for, and to underpin the vision, culture and tradition of the parish, and their submission is included in Section 16, pages 89-90 of the Plan document.

D Consultation Statement

GEORGEHAM PARISH COUNCIL.

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21 October 2015

Mr Graham Townsend
Strategic Development and Planning
North Devon Council
Lynton House,
Commercial Road
Barnstaple
EX31 1DG

Dear Mr Townsend

Neighbourhood Planning (general) Regulations 2012
Application for Designation of a Neighbourhood Area: Georgeham Parish

Under the relevant legislation as set out in the Neighbourhood Planning (General) Regulations 2012, Georgeham Parish Council being a "relevant body" as defined in Section 61(G) of the Town and Country Planning Act 1990, wish to prepare a Neighbourhood Development Plan.

As required by the Regulation 5, this Application for Designation of a Neighbourhood area is accompanied by the following:

1. A map which identifies the area to which the area application relates;
 2. A statement explaining why this area is considered appropriate as a Neighbourhood Area;
 3. A statement that the organisation or body making the area application is a relevant body for the purposes of Section 61(G) of the 1990 Act.
1. The Neighbourhood Area as identified in the enclosed map is the whole of the Parish of Georgeham, as outlined in red.
 2. The Parish Council considers the defined area to be appropriate for designation because Georgeham has been a parish since 1261. Although it has 2 very different main villages as well as the hamlets of Pickwell, Putsborough, Darracott, North Buckland, Cross and Forda, it works well as a unit, the different parts compliment each other and are inter-dependent.
 3. Georgeham Parish Council is making this application for registration on behalf of the parishioners who will be thoroughly consulted, as they were for our Parish Plan of 2004 and for the submission we made as part of the Local Plan in 2012. The parish, working with the District Council, prefers to influence how its area is developed in terms of structure and atmosphere.

For the purposes of Section 61(G) of the 1990 Act this letter is our statement.

Kind regards

Sue Squire

Mrs Sue Squire
Clerk to Georgeham Parish Council

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Notice of designation of a Neighbourhood Area

In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) North Devon Council advises that, following the statutory publicity period, it has designated Georgeham Parish as a Neighbourhood Area. The extent of the area is the whole area of the parish, as shown in the map below. The Relevant Body who applied for this area to be designated was Georgeham Parish Council.



Mike Mansell

Chief Executive 7th December 2015

D Consultation Statement

3 Public responses

- 3.1 Overall, more than 100 written responses were received, plus additional verbal input as a result of the public meetings in June 2016, local publicity and *The Crydda* questionnaires. The responses were collated by Verlie Meek, Sam Hood and Jo Fitzgerald.
- 3.2 Responses indicated a high level of satisfaction and pleasure in living in the parish. Most people are happy with the area, its facilities and community spirit. Location, scenery, peacefulness, community and amenities all scored highly.
- 3.3 Concerns centred around the impact of tourism, especially in Croyde, and the increase in second homes and holiday lets, resulting in high house prices compared to local wages and leaving many houses empty in the winter. The area is felt to be overcrowded in the summer, when traffic and parking is a problem. New modern house design is not generally appreciated, nor are open air festivals, which some felt could become a nuisance and alienate people.
- 3.4 Respondents expressed concerns about overdevelopment and inadequate infrastructure, including narrow roads, traffic congestion and the ability of the sewage system to cope with more houses. Inadequate fast internet access is considered a problem in some areas.
- 3.5 There were many comments on what the community needs:
- a) Growth at the school to secure its presence
 - b) Small, really affordable and social rented housing, to match the often low incomes
 - c) Enforced speed limits
 - d) More support for local businesses, and regulation of pop-up businesses trading at the roadside
 - e) Greater protection for the Area of Outstanding Natural Beauty and Conservation Areas
 - f) Better facilities for pedestrians, cyclists and horses who all have to compete with motorised traffic in the lanes
 - g) Bans on dogs on the beaches were disliked by some, but so too was the presence of dogs in Georgeham Playing Field.
 - h) There was strong support for the need to keep a balance between tourism and residency, with Croyde community members feeling particularly endangered.
- 3.6 The Neighbourhood Plan has not attempted to address all the issues raised in consultation, but rather to focus on those that can be tackled through the planning system. Suggestions outside the scope of the Plan, have been directed to the Parish Council or local groups. Some of these issues can be found in the Community Action List (see [page 49](#)).

4 Business responses

- 4.1 Local businesses were invited to submit their views by letter and at the meetings held specifically for them on 13 and 26 October 2016. Most written responses and most of those present at the business meetings were sole traders who mainly rely on the local community and tourist industry for work.
- 4.2 One employer of 300 people who replied stated that he only employs one person in the parish. However, another employer working mostly in tourism responded that he would like to expand so that he could employ people all year, but was conscious that expansion had to be done with care to avoid spoiling the character of the area on which so much depends. Other responses were:
- 4.3 Suggestions to benefit the community:
- a) Local support for businesses, for example small businesses remarked that a hub/shared office could help solve the internet access problem if located in an area with fast broadband speed,

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although the roll-out of high-speed fibre broadband should reduce the need for this.

- b) More permanent residents are needed, therefore there should be fewer holiday homes and more affordable housing
- c) Extension of the holiday season.

4.4 Things that hinder development:

- a) Large seasonal variation in population
- b) Infrastructure problems, including transport.

4.5 There were three requests regarding tourist facilities:

- a) There should be no more facilities
- b) Provide more seasonal parking
- c) Provide accommodation for seasonal staff who cannot do late shifts because there is no public transport.

4.6 Generally, it was felt that:

- a) Infrastructure, especially roads, would not support higher numbers of visitors in high season
- b) There should be fewer festivals
- c) There is overdevelopment of second homes
- d) A business hub and office would be encouraging
- e) A register of local trades people should be posted online.

5 Drafting the Plan

5.1 In January 2017, a meeting was held involving Mr Townsend from North Devon District Planning Office and members of the original group, as well as members of Croyde Area Residents' Association, to review the proposed Plan. Further meetings were held throughout 2017 and 2018, and work continued to consult stakeholders, collect information and create a document suitable for submission to North Devon Council for independent review to ensure that proper legal process has been followed and that the Plan conforms with strategic local policy.

5.2 In November 2018, a draft plan was distributed for a pre-submission consultation, the formal six-week process during which a wide range of consultees are invited to comment. The consultees not only include residents of the parish, but many other bodies, both local and national, ranging from The National Trust, The Marine Conservation Organisation, telecom companies and neighbouring parish councils, as well as local organisations, businesses and community groups.

5.3 The steering group has continued to meet approximately monthly, drawing on contributions from parish councillors Tina Luxton (affordable housing), Mike Harrison (maps), and Eirene Williams (landscape). There has been ongoing consultation with Andrew Austin, who succeeded Mr Townsend in January 2019, and Elizabeth Dee from North Devon District Planning Office.

5.4 As a result of the feedback received, and following the formal adoption of the North Devon and Torridge Local Plan in October 2018, the Georgeham Plan was restructured to provide greater clarity and vision, without losing the content to which so many people have contributed.

5.5 In June 2019, following the election of a new parish council, councillors met to review the work of the steering group and to formally endorse the revised approach and work so far. Following Cllr Verlie Meek's retirement from the parish council, Cllr Maggie Beaumont took over leadership of the core steering group, which also included Cllrs Eirene Williams and Jane Young. The group has engaged with individuals and organisations within and beyond the parish to ensure that the consultation process has been as wide as possible.

5.6 Specific suggestions were made regarding content wording and presentation. These did not amount to a change in content, rather to improve the clarity and order of information. Overall

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there was support for the improvements made to the draft. It was felt to flow better and that the Government Sustainability Agenda was expressed more clearly.

- 5.7 Work continued during the second half of 2019 to further refine the content, draft appendices in compliance with Neighbourhood Planning Regulations and include more photographs and maps.
- 5.8 The District Council funded an independent ‘health check’ report of the re-drafted Neighbourhood Plan by Cat Loveday BSc (Hons) MSc MRTP in late 2019, which was delivered in February 2020. The report was positive and contained some constructive suggestions which were duly incorporated into the Plan.
- 5.9 However, no sooner had the report been received, but the Covid-19 pandemic struck. This affected the ease with which work could progress on the document but was helped by the use of online meetings.
- 5.10 Throughout the process of preparing the Plan regular reports have been made at Parish Council meetings, and at Croyde Area Residents’ Association open meetings held approximately three times a year. This has enabled public interest to be sustained in the preparation of the Plan.
- 5.11 Preparations were made to launch a further consultation with the public which was to run from 1 February 2021 to 5 April 2021, extended from six to eight weeks to allow for the on-going Covid restrictions on public meetings.
- 5.12 The communication strategy included:
- a) Emailing all consultees on the required formal list
 - b) Advertising in the local press (weekly inserts)
 - c) Publicity in the parish magazine (two inserts)
 - d) Holding an extra-ordinary Parish Council meeting by Zoom on 15 March 2021
 - e) Publishing the Plan and an Executive Summary containing the Objectives and Policies of the Plan on the Parish Council website, and the Croyde Area Residents’ Association website (CARA). CARA covers the parish area and not just Croyde.
 - f) Social media platforms such as ‘What’s On Georgeham and Croyde’ were utilised to advertise the Plan and invite comment.
 - g) Individual emails were sent to the membership of the Community Land Trust organisation (56 members); and CARA (over 100 members)
 - h) Emails were distributed to organisations such as the local Climate Emergency Group and Plastic Free North Devon.
 - i) The Georgeham and Croyde Community Caring Group were able to identify those people who do not have access to the internet, or who found it difficult to read the document online. Hard copies of the Plan were provided to those who requested them (together with guidance on safe handling within the Covid guidelines).
 - j) Hard copies were loaned and distributed throughout the parish to those who requested them. Notice of the availability of paper copies of the Plan was posted on social media and in the parish magazine.
 - k) Posters were placed on the public noticeboards outside the village halls and post offices.
 - l) Comments were invited to be sent to the Parish Clerk in writing or via email, or via the drop-boxes in the post offices in Georgeham and Croyde. One anonymous, but positive response was received via a drop box.
 - m) Local businesses were contacted to draw attention to the Consultation process (see spreadsheet).
- 5.13 In all, some 40 responses have been received from the formal list of consultees. Most simply acknowledged receipt of the Plan. In addition, 17 comments were received from individuals. Most

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were positive or wanted even greater control on the design of buildings, traffic management, second home ownership or building outside the designated development boundaries of the settlements (see [page 33](#) for a summary of comments extracted from their responses). Some of these issues are beyond the scope of the Plan; others have been referred to the Parish Community Action Plan.

- 5.14** Some concerns related to the frequency with which the District Council disregarded the recommendations of the Parish Council on planning decisions. A Planning Decision Monitoring Form (see Section 18, page 95 of the Plan) will form the basis for ongoing discussion with District Planning officers in the future.
- 5.15** The following tables list the consultees addressed and the responses/actions taken.

| Formal consultation stage – consultees | | |
|----------------------------------------------------------|-------------------------------------------|-----------------------------------------------------------------------------------------------|
| Organisation | Contact at | Response |
| North Devon Council | | |
| North Devon Council, Strategic Development and Planning | localplan@northdevon.gov.uk | Provided continuous advice and guidance. See pages 42-46 for formal response. |
| Other relevant local authorities | | |
| Devon County Council, Education Planning | hannah.elcocks@devon.gov.uk | See page 36 for response. |
| Devon County Council Planning, Transport and Environment | christina.davey@devon.gov.uk | |
| Mid Devon Council | fplan@middevon.gov.uk | |
| Somerset County Council | pflaherty@somerset.gov.uk | |
| West Somerset Council | mwilsher@westsomerset.gov.uk | |
| Parish councils | | |
| Braunton Parish Council | tracey@brauntonparishcouncil.gov.uk | Acknowledged receipt. No comments. |
| Mortehoe Parish Council | sallyatmortehoeipc@gmail.com | Acknowledged receipt. |
| West Down Parish Council | v.huntwdparishclerk@gmail.com | Responded. No issues. |
| Government bodies and other national agencies | | |
| Coal Authority | planningconsultation@coal.gov.uk | Acknowledged receipt. No issues. |
| Environment Agency | SPDC@environment-agency.gov.uk | See page 36 and page 67 for responses. |
| Exmoor National Park Authority | plan@exmoor-nationalpark.gov.uk | Acknowledged receipt. |
| Highways England | chrystele.garnier@highwaysengland.co.uk | See page 37 for response. |
| Historic England | david.stuart@historicengland.org.uk | See page 37 for responses. |
| Homes England | enquiries@homesengland.gov.uk | |
| National Trust | angela.wood@nationaltrust.org.uk | Acknowledged, no further comment. |
| Natural England | clare.guthrie@naturalengland.org.uk | See page 38 and page 69 for responses. |
| Network Rail | grace.lewis@networkrail.co.uk | See page 38 for response. |
| NHS England | TSDFT.s106@nhs.net | |
| North Devon Coast AONB | dave.edgcombe@devon.gov.uk | See pages 39-41 for responses. |
| Marine Management Organisation | consultations.mmo@marinemanagement.org.uk | Acknowledged receipt. No issues. |
| Ministry of Defence | DIOOpsNorth-PTS3f@mod.uk | |
| Police and Crime Commissioner | opcc@devonandcornwall.pnn.police.uk | Referred matter to local policing team. |
| Regulator of Social Housing | enquiries@rsh.gov.uk | Referred matter to Homes England. |
| Sport England | planning.south@sportengland.org | See pages 47-48 for response. |

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| Formal consultation stage – consultees | | |
|---------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------|
| Organisation | Contact at | Response |
| Telecommunications companies | | |
| Arqiva | mike.smith@arqiva.com | |
| AWA Telecommunications Network | Elford Park, Milford Road, Lymington, SO4 1JD | |
| BT (Planning) | newsites.plymouth@openreach.co.uk | |
| BT Payphones | customer.serv.payphones@bt.com | |
| Cornerstone Telecommunications Infrastructure | brian.truman@ctil.co.uk | |
| CTIL Estates | ctil.access@cluttons.com | Acknowledged |
| EE | public.affairs@ee.co.uk | |
| Mobile Broadband Network | mark.shaw@mbnl.co.uk | |
| Three | william.comery@ericsson.com | |
| O2 UK | 260 Bath Road, Slough, SL1 1LX | |
| Vodafone | The Connection, Newbury, RG14 2FN | |
| Health and utilities providers | | |
| British Gas | Tresillian Way, Cardiff | |
| Cboard Energy | Brighton, BN3 5AW | |
| National Grid | n.grid@amecwf.com | |
| Avison Young UK | nationalgrid.uk@avisonyoung.com | |
| National Grid UK Transmission | PO Box 3484, Warwick, CV34 6TG | |
| NHS Northern Eastern and Western Devon Clinical Commissioning Group | D-CCG.northernlocality@nhs.net | |
| NHS Property Services | information@property.nhs.uk | |
| Northern Devon Healthcare NHS Trust | ndht.contactus@nhs.net | See page 47 for response. |
| South West Electricity Board | Osprey Road, Sowton Industrial Estate, Exeter, EX2 7HZ | |
| South West Water | developerservicesplanning@southwestwater.co.uk | Acknowledged receipt of email. No other comment. |
| Western Power Distribution | wpdnewsupplies@westernpower.co.uk | Acknowledged, no further comment. |
| Other organisations and agencies | | |
| BT Payphones | customer.serv.payphones@bt.com | |
| Crown Estate Office | New Burlington Place, London W1S2HX | |
| Devon Wildlife Trust | bbroadbent@devonwildlifetrust.org | |
| Devon and Cornwall Police | rick.napier@devonandcornwall.pnn.police.uk | See pages 34-35 for response. |
| Heart of the South West Local Enterprise Partnership | judith@jegannon.co.uk | Acknowledged, no further comment. |
| North Devon Area of Outstanding Natural Beauty | aonb@devon.gov.uk | |
| North Devon UNESCO Biosphere Reserve Partnership | andrew.bell@devon.gov.uk | Acknowledged receipt of email. No further comment |
| South West Coast Path Association | richard@southwestcoastpath.org.uk | See page 47 for response. |
| SSA Planning, Nottingham | mark.mcgovern@ssaplanning.co.uk | Requested information which was sent. |
| Stagecoach South West | southwest.enquiries@stagecoachbus.com | Acknowledged, no further comment. |

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| Formal consultation stage – consultees | | |
|----------------------------------------------|----------------------------------------|------------------------------------------------------------------------------|
| Organisation | Contact at | Response |
| Local organisations and businesses | | |
| Croyde Area Residents Association | croydeara@gmail.com | See CARA submission, Section 14, pages 78-82 of the Plan. |
| Climate Emergency Group | jonething@mac.com | See Climate Emergency Group submission, Section 12, pages 60-63 of the Plan. |
| Georgeham and Croyde Caring Community Group | croydeara@gmail.com | |
| Georgeham Parish Community Land Trust | georgehamparishclt@gmail.com | |
| Architects | | |
| Woodward Smith Architects | enquiries@woodward-smith.co.uk | |
| Peregrine Mears Architects | mail@mearsarchitects.com | |
| RGP Architects | rgp@rgparchitects.com | Acknowledged receipt of email. |
| Reedesigns Architects | reedesignoffice@gmail.com | |
| Holiday centres and campsites | | |
| Ocean Pitch | oceanpitchcroyde@gmail.com | |
| Orchard Camping | orchardcamping@gmail.com | |
| Cherry Tree Farm Campsite | cherrytreefarmcampsite@gmail.com | |
| Freshwell Campsite | freshwellcamping@gmail.com | |
| Croyde Coastal Camping | camping@croydebay.co.uk | |
| Inclledon Farm | inclledonfarm@gmail.com | |
| Bay View Campsite | info@bayviewfarm.co.uk | |
| Parkdean Resorts | stephen.griffiths@parkdean-resorts.com | Acknowledged Plan's intention to designate local green space. |
| Putsborough Beach | rob@putsborough.com | |
| Combas Farm | info@combasfarm.co.uk | |
| Estate agents and property management | | |
| Webbers | braunton@webbers.co.uk | |
| Phillips Smith and Dunn | charles@phillipsland.com | |
| John Smale | sales@johnsmale.com | |
| Bond Oxborough Phillips | braunton@boproperty.com | |
| Hospitality | | |
| The Manor | info@themanorcroyde.co.uk | |
| Kings Arms | info@kingsarmsgeorgeham.co.uk | |
| The Rock | rockinnbookings@gmail.com | |
| The Thatch | reception@thethatchcroyde.com | Acknowledged receipt without comment. |
| Billy Budds | info@billybudds.co.uk | Acknowledged receipt without comment. |
| Catering suppliers | | |
| Phillip Dennis Foods | contactus@philipdennisshoop.co.uk | |
| John Patts | orders@johnpatts.co.uk | |
| Charitable organisations | | |
| Pickwell Foundation | info@pickwellmanor.co.uk | |
| St George's House | info@sghdevon.org | Acknowledged receipt without comment. |

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| Formal consultation stage – consultees | | |
|----------------------------------------|------------------------------------|-------------------------------------|
| Organisation | Contact at | Response |
| Funeral directors | | |
| RPB Funerals | clarke@rpbfunerals.co.uk | Acknowledged receipt. No issues. |
| Baddick and Dymond | | Acknowledged email. Nothing to add. |
| Co-op Funeralcare | | |
| W S Gayton and Son Ltd | enquiries@wsgayton.co.uk | Acknowledged email. Nothing to add. |
| Padfields | info@padfieldsfuneralservice.co.uk | |

5.16 In all, 17 local residents responded during the formal consultation period. Feedback was largely complimentary and supportive of the Plan, and reflected local concerns about second homes and the lack of affordable housing, as well as the impact of tourism on traffic, infrastructure and services. Names have been omitted but their comments included:

The built environment: *“The parish would benefit from a simple Design Statement for the villages”.*

Rural exception sites: *“The policy (H3, see [page 5](#)) ... is too wide and could easily be used to increase the number of properties outside the development boundaries. There needs to be more detailed rules on how an exception could be granted. Clause a) is not that restrictive and clause b) does not set out what ratio of housing stock would be considered acceptable”.*

Tourism: *“It is so important to protect the beautiful natural environment ... for future generations and to consider the needs of the people who live in the villages. Many rely on tourism for their livelihood, but it is important that the infrastructure and natural environment are not overwhelmed”.*

Sustainable development: *“It is vital that there is some housing that is affordable for local people ... if the village loses its character and heart, it will just become another over-developed resort. The beauty of this area will have been lost”.*

Second homes: *“Planning decisions are allowing garages to be turned into one-bed dwellings despite objections. I am likely to be surrounded by second home owners with no way of stopping it happening as one-by-one houses next to me will come up for sale as neighbours become older and leave or die”.*

Another resident wrote: *“The seriousness of more second homes should be raised to the highest level possible and a percentage limit should be set for any residential area for the number of second homes allowed”.*

Broadband: *“It should be stipulated that any new housing has a broadband plan that will allow no degradation to the other areas in the parish”.*

Sewage: *“Any new housing plan needs to be clear about its sewage and waste treatment plan”.*

Traffic: *“I realise the traffic management is not part of the plan but think that any new housing needs to be clear on how it will contribute to minimising the impact of the development on the traffic in the area”.*

Parking: *“Parking is a major problem and so keeping the cost of parking down is important. So the Parish Plan should stress the need for more car parking direction signs and more signs warning not to park in areas where the public transport is busy”.*

Footpaths and bridleways: *“It has become increasingly dangerous to horse ride in peak times and weekends ... I notice that there are some fantastic new routes planned for easier accessibility to local areas. Please can all of these be open to horse riders as well”.*

Another resident wrote: *“We are not in favour of a second public footpath on Pickwell Barton. The There would be serious health and safety issues due to cattle grazing in those fields”.*

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3.7

| Formal consultation stage - consultee responses and action taken | | |
|------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Organisation | Response | Action taken |
| Devon and Cornwall Police | <p>6 April 2021</p> <p>Thank you very much for inviting consultation regarding the above.</p> <p>My role as the Police Designing Out Crime Officer (DOCO) is to provide appropriate and relevant advice and recommendations to the Planning Authority, Developers and Architects with regard to designing out opportunities for crime, the fear of crime, anti- social behaviour (ASB) and conflict within the built environment, an effective method in improving the safety, security and wellbeing of those who will live, work and visit those environments.</p> <p>The type of applications I would respond to, as agreed between the Police and the Local Planning Authorities are: -</p> <ul style="list-style-type: none"> • Major housing schemes of 10+ dwellings • Major commercial office, industrial, retail or leisure schemes • New neighbourhood or district community facilities • Shop front improvements • Proposals which include significant areas of open space/landscaping as part of a development, including linkage footpaths • Proposals incorporating significant off-street car parking provisions • Proposals involving transport interchanges or other significant highway infrastructure • Improvements such as cycle lanes and new or improved footpaths • All applications for Class E(c), and Sui Generis food and drink uses • New or redeveloped schools/education premises • Where the intended occupants are particularly vulnerable and require higher standard of security to ensure their person safety (this would include Gypsy and Traveller sites, care homes and drug rehabilitation centres • ATM's • Solar Farms • Any planning policy documents where community safety is relevant. This will include the Core strategy and Supplementary Planning Guidance documents <p>As such it may be that some future developments within these areas will not receive a response from the Police, so reference to designing out crime and crime prevention <i>per se</i> should be embedded at the most appropriate and relevant place of the Neighbourhood Plan (NP), in this case may I suggest, 5.4 Policies for the Built Environment (BE1 – 9 inclusive) in order to support the wider adopted North Devon & Torridge Local Plan and comply with the requirements of the following:-</p> <ul style="list-style-type: none"> • National Planning Policy Framework 2019 (NPPF), specifically Sections: - <ul style="list-style-type: none"> 8. <i>Promoting healthy and safe communities, paragraph 91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</i> <ul style="list-style-type: none"> b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. 12. <i>Achieving well-designed places, paragraph 127</i> <ul style="list-style-type: none"> f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. • Crime and Disorder Act 1998, specifically section 17 which directs that we must have community safety embedded into our planning, our policy and our operational day-to-day activity. It states 'Without prejudice to any other obligation imposed on it, it shall be the duty of each authority ... to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area'. <p style="text-align: right;"><i>/ continued over</i></p> | Comments noted. |

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| Formal consultation stage - consultee responses and action taken | | |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Organisation | Response | Action taken |
| Devon and Cornwall Police <i>(continued)</i> | <p>All relevant planning applications should demonstrate, generally in the Design and Access Statement, the following principles of Crime Prevention through Environmental Design (CPTED) and how they have been considered and incorporated into the design and layout of all new developments. This provides reassurance and will ensure a consistent level of security throughout and opportunities for crime, the fear of crime, ASB and conflict are minimised: -</p> <ul style="list-style-type: none"> • Access and movement - Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security. • Structure - Places that are structured so that different uses do not cause conflict. • Surveillance - Places where all publicly accessible spaces are overlooked. • Ownership - Places that promote a sense of ownership, respect, territorial responsibility and community. • Physical protection - Places that include necessary, well-designed security features. • Activity - Places where the level of human activity is appropriate to the location and always creates a reduced risk of crime and a sense of safety. • Management and maintenance - Places that are designed with management and maintenance in mind, to discourage crime. <p>I look forward to providing advice and recommendations regarding planning applications that sit within my remit of response, but in the meantime, please do not hesitate to contact me if I can be of further assistance.</p> <p>Rick Napier, Designing Out Crime Officer Devon and Cornwall Police North Devon, Torridge and Mid Devon</p> | |

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| Formal consultation stage - consultee responses and action taken | | |
|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Organisation | Response | Action taken |
| Devon County Council (Education Planning) | <p>31 March 2021</p> <p>I work in the Education Planning Team and have been sent a copy of the Georgeham Neighbourhood Plan – 2021-2031.</p> <p>I would just like to comment that Devon County Council consider that there is sufficient places at Georgeham Primary School for the cohorts of future pupils that live within its catchment area. As such DCC does not have any plans to expand the school. We will keep this under review as we monitor local planning applications and demographics accordingly to ensure that DCC can fulfil its statutory responsibilities for pupil place planning.</p> <p>Please do let me know if you require any further information.</p> <p>Hannah Elcocks School Infrastructure and Place Planning Officer, Devon County Council</p> | Comment noted. |
| Environment Agency | [For the Environment Agency's response of 5 August 2020 regarding Strategic Environment Assessment and Habitats Regulations Assessment see page 67.] | No issue with screening report. |
| Environment Agency | <p>12 November 2018</p> <p>Thank you for your consultation of 25 October 2018 providing us with the opportunity to comment in respect of the Georgeham Neighbourhood Plan prior to pre-submission stage, (SEA/HRA screening opinion).</p> <p>In general we consider that it is unlikely that neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.</p> <p>We attach a guide 'Planning for the environment at the neighbourhood level' which covers the following:</p> <ul style="list-style-type: none"> • Ideas on how to improve your local environment through neighbourhood planning; • Where to go for information about your local environment; • Information on environmental assessment. <p>More information on when to consult us is available on line at: https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</p> <p>In addition a range of general environmental information and maps about the local environment can be accessed online at: http://apps.environment-agency.gov.uk/wiyby/.</p> <p>More specific information regarding planned flood and coastal defence infrastructure investment and the ecological/chemical status of water-bodies can be found by following these links respectively:</p> <ul style="list-style-type: none"> • https://www.gov.uk/government/publications/programme-of-flood-and-coastal-erosion-risk-management-schemes • http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/8 <p>Please note, this is a standard response. If you consider the plan will result in significant environmental effects please re-consult us.</p> <p>Please note that we will, as part of our statutory duty, provide bespoke consultation comments at Regulation 14 (pre-submission) stage.</p> <p>Harriet Fuller Sustainable Places Devon, Cornwall and the Isles of Scilly</p> | Comments noted. SEA/HRA Screening Report completed September 2020 (see page 50) |

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| Formal consultation stage - consultee responses and action taken | | |
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| Organisation | Response | Action taken |
| Highways England | <p>30 March 2021</p> <p>Thank you for providing Highways England with the opportunity to comment on the submission version of the Georgeham Parish Neighbourhood Plan 2021-2031.</p> <p>Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A30 trunk road which passes some distance to the south of the Plan area. We are therefore satisfied that the Plan's proposed policies are unlikely to result in development which will adversely impact the trunk road and we therefore have no comments to make.</p> <p>This does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p> <p>Chrystèle Garnier-Kusiak Administrator, Performance Assurance & Business Services Team Highways England</p> | Comments noted. |
| Historic England | <p>6 April 2021</p> <p>Thank you for your Regulation 14 consultation on the pre-submission version of the Georgeham Neighbourhood Plan.</p> <p>There are no specific issues associated with the Plan upon which we wish to comment.</p> <p>Our congratulations to your community on its progress to date and our best wishes for the making of the Plan.</p> <p>David Stuart Historic Places Adviser South West</p> | Comments noted. No issues with revised Plan. |
| Historic England | [For Historic England's response of 1 September 2020 regarding Strategic Environment Assessment and Habitats Regulations Assessment see page 68 .] | No issue with screening report. |
| Historic England | <p>3 October 2018</p> <p>Many thanks for making contact on your Plan.</p> <p>While Historic England may need to be consulted at various stages in a Plan's preparation dependent on the extent to which it affects our interests, our role is not to duplicate or substitute for the heritage advice available from your parent local authority. While James Bate may have left North District Council Collette Hall remains as the Conservation Officer and the County Council can provide archaeological advice.</p> <p>There is also a matter of our capacity - there is only me to deal with all neighbourhood planning matters in the southwest and so our attention needs to be focused on where more than locally significant heritage issues are involved! In terms of the specific heritage evidence gathering exercises you are engaged in, these will likely be determined by what you want your Plan to do. Given the agenda you set out below that evidence will likely define what is special and distinctive about the area's historic character to inform policies which prevent its erosion in the manner you suggest. The most effective Plans in this respect are those which set out very clearly what those aspects of local character are and tailor policies for their protection and enhancement accordingly. The more specific they can be in terms of evidence base and drafting of policy the more effective they will be.</p> <p>Your emerging Plan in policies such as CH 2, H1, H2, OGS 1 & 5 commendably sets out how your community feels future development should take place and draws upon an understanding of locally distinctive character to inform them. It is for the community with support from the District Council to determine whether these are specific and robust enough and underpinned by appropriate evidence to achieve the outcomes which prompted the desire to produce a Plan in the first place.</p> <p>As far as the overall scope of your Plan is concerned there are as it stands no issues that it raises which prompt us to feel that we need to engage in detailed liaison on its content. On that basis, and unless it changes significantly, we would therefore not expect further consultation until the Regulation 14 stage.</p> <p>Otherwise, we would congratulate your community on its progress to date and wish it well in its future endeavours.</p> <p>David Stuart Historic Places Adviser South West</p> | Comments noted. SEA/VHRA Screening Report completed September 2020 (see page 50) |

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| Organisation | Response | Action taken |
| Natural England | [For Natural England's response of 1 September 2020 regarding Strategic Environment Assessment and Habitats Regulations Assessment see page 69 .] | No issue with screening report. |
| Natural England | <p>12 December 2018</p> <p>Thank you for your consultation email dated 25 October 2018.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We welcome the development of a neighbourhood plan for Georgeham and recognise the effort that has gone into its preparation.</p> <p>We would like to make the following brief comment on the draft plan which we hope you find useful at this early stage in the development of your plan:</p> <p>At Section 1.8 we would recommend the inclusion of 'Protect and enhance the natural environment' as a key policy driver. The natural environment is obviously important to the Parish as referenced in section 1.3.3.</p> <p>We would recommend the inclusion of an objective in Section 2.2 specifically aimed at protecting and enhancing the natural environment. Habitats are referred to in section 2.2.4 but in relation to open and green space only.</p> <p>At Section 3.1.3 the general development principles could include an objective to secure biodiversity net gain from development in line with the NPPF and the Defra 25 year environment plan.</p> <p>This could be supported in Section 3.5 open spaces and the natural environment by amending Section 3.5.1 (b) to 'protect and enhance those aspects of the natural environment....'</p> <p>We welcome Policy OGS2: Flora and fauna in the open spaces natural environment section.</p> <p>Policy OGS8: Agricultural land needs correcting. Best and Most Versatile land (BMV) includes Grades 1, 2 and 3a.</p> <p>We would recommend inclusion of an environmental constraints map showing the location of the North Devon AONB, Sites of Special Scientific Interest, County Wildlife Sites etc.</p> <p>Although outside the Parish boundary, any development will need to consider the potential impacts on the Braunton Burrows Special Area of Conservation (SAC) and you will need to work closely with the Local Authority on this issue.</p> <p>Where undeveloped sites are included within the development boundaries for Croyde and Georgeham they will be subject to Strategic Environmental Assessment (SEA) where the settlement falls within an Area of Outstanding Natural Beauty (AONB). This should not be onerous but will need to take landscape impacts into account.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact me on the details below. For any new consultations, or to provide further information on this consultation please send any correspondence to consultations@naturalengland.org.uk.</p> <p>Clare Guthrie, Lead Advisor Sustainable Development - Devon</p> | Comments noted and Plan revised accordingly. SEA/HRA Screening Report completed September 2020 (see page 50) |
| Network Rail | <p>9 April 2021</p> <p>I can see from our spreadsheet that someone in our team has had a look at your Neighbourhood Plan and we have no comments to make as no railway will be affected.</p> <p>I hope this helps.</p> <p>Grace Lewis, Town Planning Technician Network Rail</p> | No action required. |

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| Organisation | Response | Action taken |
| North Devon Coast AONB | <p>31 March 2021</p> <p>Please find enclosed our official response to the Draft Georgeham Neighbourhood Plan.</p> <p>Overall as a document it has much to commend it, the pictures are great and the Character Area Appraisals will prove very useful when considering future planning applications within Croyde. In general the document has captured the issues and the important landscape attributes of the area.</p> <p>However, the big omission is any mention of the AONB Management Plan, which we find surprising given that we presented to the Parish at the outset of your work and that our Vice Chairman Eirene Williams has been actively involved in the Plan's development.</p> <p>Whilst it is clear from the Neighbourhood Plan that the AONB is very dear to the parish and local community, I am sure some of the policies within our plan, could help the phrasing of your policies and objectives or could "smarten them up", especially the landscape ones, but also others such as affordable housing and planning could be considered.</p> <p>Enclosed a link for you to review our Plan, a summary of our Policies can be found on Page 6. You can also review the Special Qualities that make the AONB worthy of designation and some of these could be mentioned in your Plan as well. (See pages 9-12)</p> <p>North Coast AONB Management Plan 2019 - 2024 North Devon Coast (northdevon-aonb.org.uk)</p> <p>Unlike the Biosphere Plan, AONB Management Plan production is a statutory requirement for Local Authorities, under Section 89 of the Countryside & Rights of Way Act 2000. The AONB Partnership undertakes this work on behalf of the Local Councils, and the plan has to be formally endorsed by them. As a result the plan should be seen as a Local Authority document and it is a material consideration with regard to planning.</p> <p>We are assuming that the Parish Council has a duty under Section 85 of the Countryside & Rights of Way Act 2000 as the Parish Council does represent a public body and this could be mentioned in your document</p> <p>Also there is also no mention of how post Covid, admittedly a recent issue, there is going to be increase demand for tourist accommodation and housing and how this will affect landscape, infrastructure, affordable housing, etc. within the Parish. The question to you is whether the plan robust enough not to consider these as issues?</p> <p>Our specific thoughts:</p> <p>Paragraph 2.2 - Page 4 The principles under pinning Plan Policy should include the AONB Management Plan (as mentioned above)</p> <p>Paragraph 3.2 Page 7 The walk around Bagg Point is probably one of the most popular in North Devon, yet it does not receive a mention</p> <p>Paragraph 3.7.1 and 6.1.4 – It is officially designated as South West Coast Path – not "coastal"</p> <p>Under Chapter 4 Housing, again little mention of how COVID will exacerbate demands for housing and the knock on effects in terms of lack of affordable housing</p> <p>There is no mention of having a Design Guide for Georgeham and in particular Croyde, which is something we are keen to get the LPA to lead on. The Village Character Appraisals should help to underpin this and it could be a policy that you adopt.</p> <p>6.1.2 Page 20 This fails to mention the key Plans namely The Local Plan and the AONB Management Plan. I am not sure what DCC plan you refer to. There is a Minerals Plan, but the Local Plan has replaced the Old County Structure Plan.</p> <p>6.4 NE1 intro – I think it would be worth putting in the wording "Landscape and Visual Impact Assessment" as that would be more appropriate.</p> <p style="text-align: right;"><i>/ continued over</i></p> | Comments noted and amendments made to Plan incorporating advice and suggestions. |

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| Formal consultation stage - consultee responses and action taken | | |
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| Organisation | Response | Action taken |
| North Devon Coast AONB (continued) | <p>7.1.9 – Bathing water quality is also significant (hence links back to having infrastructure capacity) and should be mentioned more.</p> <p>Paragraph 10.2.1 The Parish lies within the Transition Zone of the UNESCO Biosphere. The Core refers only to the SAC/SSSI at Branton Burrows. The Buffer Zone is a bit of a grey area and I would advise you contact the Biopshere Manager to seek clarification Andrew.bell@devon.gov.uk</p> <p>Biosphere Map - North Devon UNESCO Biosphere Reserve UK (northdevonbiosphere.org.uk)</p> <p>Appendices 10 Page 37. The AONB Management Plan should be recognised as an important document.</p> <p>Key Viewpoints and Vistas</p> <p>The traditional enclosed strip field system on the lower slopes of Saunton Down are not recognised as important, but in our opinion are under threat. You could mention this in View Points 1 (Ora Hill), possibly 2 (Alf's seat) 4 (North Ridge) & 6 Middleborough Hill</p> <p>As I mentioned to Branton Parish, as with all these key vistas, you need to “tease out” the elements of the landscape that contribute to the view (field patterns, woodland, dunes etc.) and from this you can be more specific about what we can and should conserve. The landscape character assessments should help you to do this.</p> <p>The above may sound over critical, but I can assure you that it is not. On the whole the document is very good and if the AONB Management Plan is duly acknowledged, I am sure the AONB Partnership would be happy to endorse it. Once completed, we would be more than happy to put it onto our website.</p> <p>Hope this helps in your work.</p> <p>Dave Edgcombe North Devon Coast AONB Project Officer</p> | |
| North Devon Coast AONB | <p>21 December 2018</p> <p>Thank you for sending the North Devon Coast AONB a copy of the Georgeham Neighbourhood Plan for comment.</p> <p>On the whole we are pleased with the acknowledgement that the area is within the AONB and a recognition of its importance. I am afraid I haven't got time to make a detailed response but we do have the following comments to make:</p> <p>In terms of Natural and Historic Environment I would suggest that you add:</p> <ul style="list-style-type: none"> • The Foreland Point to Bideford Marine Conservation Zone, which was recently designated and really supersedes the old Voluntary Marine Conservation Area • I think you should also mention the UNESCO Biosphere Reserve centred on Branton Burrows. Parts of Croyde (ther SSSI bits in particular) are included in the Buffer zone of the reserve and the whole of the Parish is in the Transition Zone. • In landscape terms you mention the Devon Landscape Character Assessment but not the Joint North Devon and Torridge Landscape Character Assessment, based on Landscape Type, produced by North Devon Council. This is a significant document as it has been adopted by the LPA and is used to help determine both planning policy and assist in development control work. Link: https://www.torridge.gov.uk/article/11273/Joint-Landscape-Character-Assessment-for-North-Devon-and-Torridge-Districts • The relevant Landscape Character Types include: <ul style="list-style-type: none"> • 2C Steep Open slopes (above Putsborough Sands) • 4C Coastal Slopes and combes with settlement (Croyde and Cryda Valley) • 4E Extensive Intertidal sands (covers the beach at Croyde and part of Putsborough Beach) • 4F Dunes (covers Croyde sand dunes) • 4H Cliffs (covers Baggy Point and Downend) • 5C Downland (covers most of Baggy, Putsborough, Georgeham and Saunton Down) <p style="text-align: right;"><i>/ continued over</i></p> | Comments noted and amendments made to Plan incorporating advice and suggestions. |

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| Organisation | Response | Action taken |
| <p>North Devon Coast AONB (continued)</p> | <p>In addition the Seascape Character Assessment for Exmoor and North Devon was produced in 2015 Seascape Character Areas include: SCA 12 Woolacombe Bay & SCA 17 Croyde Bay and Baggy Point The document can viewed at https://www.northdevon-aonb.org.uk/projects/seascape-character-assessment Other information can be obtained at: https://www.northdevon-aonb.org.uk/our-landscape/landscape-and-seascape All these documents are really good at outlining the special qualities and key characteristics of the area, the current forces for change and pressures on them and in some instances the strategy to protect manage and plan them. So definitely worth a look, but if time is short a reference to them would suffice.</p> <ul style="list-style-type: none"> • In terms of built environment, although much of the archaeology is undesignated the structures left over from the 2nd World War US Training are a significant resource. E.g Dummy Pillbox on the cliffs at Downend and others of note on Baggy Point, where the American Rangers trained for cliff assault prior to D Day in April 1944. <p>Also above Putsborough there are a cluster of structures linked to the Morte Bay Practice Bombing Range and the AONB is currently in the process of getting them listed as archaeological assets by Historic England.</p> <ul style="list-style-type: none"> • 1.5.3 It is worth mentioning that there are some good circular walks around Croyde particularly on Baggy Point and on Saunton Down. Although there isn't much Open Access in Croyde area, National Trust have ensured there are some good "permissive footpaths" for example the footpath over Middleborough Hill which I would argue is a popular recreational route. In fact the ownership of National Trust out on Baggy is a significant resource worth mentioning, both in terms of landscape conservation and access. Also Mike Harrison's excellent footpath maps are definitely worth a mention. • In 3.1.3 You mention over-arching national and local planning policies I think we would like to see reference to the AONB Management Plan here, we have a number of AONB Policies particularly with regard to planning. For more information see: https://www.northdevon-aonb.org.uk/about/management-plan-2019-2024 • Again at 3.2 I would mention the 2nd World War Heritage • Open Spaces: I'd suggest working with Partners to increase the access opportunities, which includes trail route promotion probably through us probably (leaflets, etc.)Additional access provision working with National Trust and DCC Public Rights of Way. Also important to mention working with the landowners as they own the land. <p>Another "buzz word" at the moment is biodiversity net gain. This could be mentioned in the document. Developers should be expected to contribute to the improvement/restoration of habitat if they receive planning permission within the designated area. The recent development near Leadengate is a good example of this. To my knowledge no compensation to the environment and biodiversity has been provided which is a serious omission for such a major development in the AONB.</p> <p>If you want a good website to look at all the Environmental Assets, I would recommend this one: https://new.devon.gov.uk/environment/environmental-maps. This is an interactive map and it has many different map bases and information layers covering Access, Landscape, Biodiversity, Historic Environment a superb resource.</p> <p>Hope this helps in your deliberations.</p> <p>Dave Edgcombe North Devon Coast AONB Project Officer</p> | |

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| Organisation | Response | | | | Action taken | |
| North Devon Council | Page | "Para / Policy" | Comment | Proposed change | Comments noted and proposed changes made to Plan. | |
| | 8/9 | photos | Car registration plates are readable | Blur registration plates | | |
| | 11 | SC1 | "As currently written, the sentence in the first paragraph which states "... (which are valued by residents and visitors)..." reads | " Delete "(which are valued by residents and visitors)" and if necessary move this justification or explanation to the supporting text. | | |
| | <p>Georgeham Neighbourhood Plan Pre-Submission Consultation North Devon Council's response March 2021</p> <p>North Devon Council has responded to comments on the proposed community facilities that are of concern requiring the assessment, then it needs to list these community facilities or say how they will be identified.</p> <p>North Devon Council's submission consultation of the Georgeham Neighbourhood Plan, it is clear that a significant amount of time and effort has been taken in the preparation of the neighbourhood plan. It is accompanied by the requested assessment. This could result in debate as to which are valued."</p> <p>Comments on policies and supporting text</p> | | | | | |
| | 11 | SC4 | "Consider adding 'safety' to the list of characteristics not to be harmed" | Add "safety" | | |
| | 8/9 | photos | Car registration plates are readable | Blur registration plates | | |
| | 11 | SC1 | As currently written, the sentence in the first paragraph which states | a) Delete "(which are valued by residents and visitors)" and if necessary move this justification or explanation to the supporting text. | | |
| | 14 | H1 | Is a planning condition adequate or should it be by a legal agreement? | Consider changing planning condition to planning obligation | | |
| | 14 | H2 | Only 1 criterion is proposed so this could be simplified. Either amend "criteria" to "criterion" or merge in to a shorter sentence | b) If it is only valued community facilities that are of concern requiring the assessment, then it needs to list these community facilities or say how they will be identified. | | |
| | 14 | H3 | "Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only. It is assumed that the plan should be read as a whole. The supporting text could indicate it also needs to comply with other policies in the plan e.g. protecting landscape/AONB." | Suggest "will be considered for affordable housing development" | | |
| 11 | SC4 | Consider adding 'safety' to the list of characteristics not to be harmed" | Add "safety" | | | |
| 14 | H1 | Is a planning condition adequate or should it be by a legal agreement? | Consider changing planning condition to planning obligation | | | |
| 14 | H2 | Only 1 criterion is proposed so this could be simplified. Either amend "criteria" to "criterion" or merge in to a shorter sentence | Suggest "... outside the development boundary subject to the following criteria: a) affordable housing should be provided ..." | | | |
| 16 | Footnote 1 | Both the character appraisals and SPD supplement the NDTLP rather than form part of it | | | | |

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| Organisation | Response | | | Action taken | |
| North Devon Council (continued) | Page | "Para / Policy" | Comment | Comments noted and proposed changes made to Plan. | |
| | 8/9 | Policy | Car registration plates are readable | | |
| | 14 | H3 | the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only, which states "... (which are valued by residents and visitors)..." reads like a qualifying requirement rather than justification for their importance, i.e. only those protecting landscape AONB and community facilities that are | | Suggest "... will be considered for <u>affordable</u> housing development ..." |
| | 11 | SC1 | As currently written, the sentence in the first paragraph of the policy reads "..." (which are valued by residents and visitors)..." reads like a qualifying requirement rather than justification for their importance, i.e. only those protecting landscape AONB and community facilities that are | | Suggest "... intention that they <u>form part of</u> <u>supplement</u> the North Devon ..." |
| | 16 | Footnote 1 | Both the character appraisals and SPD supplement the NDTLP rather than form part of it | | Suggest "... intention that they <u>form part of</u> <u>supplement</u> the North Devon ..." |
| | 18 | BE1 | decisions to which are a wider more appropriate in this context rather than 'sympathetic'. | | Suggest "... DM04, and be <u>sympathetic to complement</u> key features ..." |
| | 11 | SC2 | Consider reformulating as there is no page 99. The designated characteristics not to be harmed" | | Correction |
| | 19 | BE5 (1 st paragraph) | For clarity, it may be beneficial for "Rural exception development" to cross refer to a planning condition | | Suggest "... Rural exception development (<u>permitted by</u> Policy H3) on the fringes ..." |
| | 14 | H1 | adequate or should it be by a legal agreement? | | Suggest " <u>Plans for all</u> <u>New</u> agricultural buildings outside the development boundaries <u>and impacting on the AONB should go to public consultation.</u> The application should include ..." |
| | 19 | BE5 (2 nd paragraph) | It is unclear how the proposed requirement to go to public consultation can be justified or enforced. All planning applications are published for public consultation. Development criteria are published prior to application. The qualifying criterion of 'impacting on the AONB' is subjective and its assessment would need to be explained. | | Suggest " <u>Plans for all</u> <u>New</u> agricultural buildings outside the development boundaries <u>and impacting on the AONB should go to public consultation.</u> The application should include ..." |
| | 14 | H2 | Only criterion is proposed so this could be simplified. Either amend criteria to criterion 'or merge in to a shorter sentence | | Suggest " <u>Plans for all</u> <u>New</u> agricultural buildings outside the development boundaries <u>and impacting on the AONB should go to public consultation.</u> The application should include ..." |
| | 14 | H3 | Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only. The first 2 sentences should be merged and simplified. It is assumed that the plan should be read as a whole. The supporting text could refer to development rather than the application itself | | Suggest: "All <u>planning applications</u> <u>developments</u> will be required to demonstrate that the |
| | 19 | BE7 | the purposes in the plan to be met, this can be justified by AONB and protecting landscape | | Suggest: "All <u>planning applications</u> <u>developments</u> will be required to demonstrate that the |
| 16 | Footnote 1 | Both the character appraisals and SPD supplement the NDTLP rather than form part of it | Suggest: "All <u>planning applications</u> <u>developments</u> will be required to demonstrate that the | | |

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| Organisation | Response | | | | |
| North Devon Council (continued) | Page | "Para / Policy" | Comment | Comments noted and proposed changes made to Plan. | |
| | 8/9 | Policy | Car registration plates are readable on the proposed development rather than the applications itself | | development has <u>they make adequate</u> provision for ..." |
| | 11 | SC1 | "As currently written, the sentence in the first paragraph which states ... (which are valued by residents and visitors)..." reads like a qualifying requirement rather than justification for their importance. i.e. only those community facilities that are shown to be valued by residents and visitors are required to be accompanied by the requested assessment. This could result in debate as to which are valued." | | Suggest "... pests, and b) Clarify definition of existing complex |
| | 19 | BE9 | "... (which are valued by residents and visitors)..." reads like a qualifying requirement rather than justification for their importance. i.e. only those community facilities that are shown to be valued by residents and visitors are required to be accompanied by the requested assessment. This could result in debate as to which are valued." | | Suggest: " b) <u>consideration has been given to enhancing opportunities are identified and taken to enhance the landscape ..."</u> |
| | 22 | NE1 | "... (which are valued by residents and visitors)..." reads like a qualifying requirement rather than justification for their importance. i.e. only those community facilities that are shown to be valued by residents and visitors are required to be accompanied by the requested assessment. This could result in debate as to which are valued." | | "c) <u>consideration has been given to eliminating opportunities are identified and taken to eliminate noise and light pollution ..."</u> |
| | 23 | NE3 | Paragraph 100 of the National Planning Policy Framework states that policies for managing development within a Local Character Area should be consistent with the character of the area. For Green Belt. For clarity, policy NE3 should set out the criteria of what will be supported. | | Update the policy to be clear what will/will not be permitted. |
| | 11 | SC4 | Is a planning condition adequate or should it be by a legal agreement? | | Move the second paragraph to section 6.3 |
| | 14 | H1 | Only 1 criterion is proposed so this could be simplified. Either amend the criteria to "criterion" or merge in to a shorter sentence | | |
| | 14 | H2 | "Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only. It is assumed that the plan should be read as a whole. The supporting text would also ensure that the policy is in general conformity with other policies in the plan e.g. and Terraces Local Plan and Torridge Local Plan protecting landscape/AONB." | | Suggest: " b) how <u>consideration has been given to incorporating opportunities for small scale renewable energy have been incorporated</u> which ..." |
| | 23 | NE4 | "Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only. It is assumed that the plan should be read as a whole. The supporting text would also ensure that the policy is in general conformity with other policies in the plan e.g. and Terraces Local Plan and Torridge Local Plan protecting landscape/AONB." | | Suggest: "... both within or <u>adjoining outside</u> the development boundaries ..." |
| 14 | H3 | "Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only. It is assumed that the plan should be read as a whole. The supporting text would also ensure that the policy is in general conformity with other policies in the plan e.g. and Terraces Local Plan and Torridge Local Plan protecting landscape/AONB." | | | |
| 28 | ED1 | Both the character appraisals and SPD supplement the NDTLP rather than form part of it | | | |
| 16 | Footnote 1 | | | | |

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| Organisation | Response | | | Action taken |
| North Devon Council (continued) | Page | "Para / Policy" | Comment | Comments noted and proposed changes made to Plan. |
| | 8/9 | | Car registration plates are | |
| | 28 | ED2 | readable sentence is a statement of process and should be deleted. Amend second sentence to explain 'such developments'. | |
| | 11 | SC1 | "As currently written, the sentence in the first paragraph which states ... (which are valued by residents and visitors)..." reads like a qualifying requirement rather than justification for their importance. I.e. only those community facilities that are shown to be valued by residents and visitors are required to be assessed. This could result in debate as to which are valued." | |
| | 28 | ED4 | Does the demonstrable need relate solely to the parish rather than needs North Devon as a whole? | |
| | 11 | SC4 | "Consider adding 'safety' to the list of criteria for the area and so it is not the only document which applicants must refer to." | |
| | 29 | 8.1.1 | Is a planning condition of the Planning and Compulsory Purchase Act 2004 legal agreement? | |
| | 14 | H1 | Only 1 criterion is proposed so this could be simplified, merging amend criteria to criterion or merge in to a shorter sentence | |
| | 14 | H2 | "Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only." | |
| | 14 | H3 | to affordable housing proposals only. It is assumed that the plan should be read as a whole. The supporting text could indicate it also needs to comply with other policies in the plan eg protecting landscape/AONB. | |
| 37 | 10.4.1 | Six LCTs are listed within the parish but the key for the corresponding map at 10.19.2 (page 43) indicates 7 LCTs. LCT 3H (included valleys) is missing from 10.4.1 | | |
| 37 | 10.4 | Amend first sentence to reflect both Devon landscape character areas | | |
| 16 | Footnote 1 | Both the character appraisals and SPD supplement the NDTLP rather than form part of it | | |

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| Organisation | Response | | | Action taken | |
| North Devon Council (continued) | Page | "Para / Policy" | Comment | Comments noted and proposed changes made to Plan. | |
| | 8/9 | Policy | Car registration plates are readable. | | |
| | 11 | SC1 | As currently written, the sentence in the first paragraph of which there are a combination of generic landscape character types (LCTs) which states "which are similar across Devon." (which are valued by residents and visitors)... reads like a qualifying requirement rather than justification for their importance. i.e. only those community facilities that are shown to be valued by residents and visitors are required to be accompanied by the requested assessment. This could result in debate as to which are valued." | | Proposed change |
| | 46 | V1 – Ora Hill | "View to Woolacombe is looking north (not west)!" "View to Ruda Holiday Camp is looking west (not north)!" | | Corrections |
| | 11 | SC4 | "Consider adding 'safety' to the list of characteristics not to be harmed" | | |
| | 14 | H1 | Is a planning condition adequate or should it be by a legal agreement? | | |
| | 14 | H2 | Only 1 criterion is proposed so this could be simplified. Either amend 'criteria' to 'criterion' or merge in to a shorter sentence | | |
| | 14 | H3 | "Whilst the footnote refers to exception sites for affordable housing, it may be beneficial to clarify within the policy wording that this exception policy refers to affordable housing proposals only. It is assumed that the plan should be read as a whole. The supporting text could indicate it also needs to comply with other policies in the plan e.g. protecting landscape/AONB." | | |
| 16 | Footnote 1 | Both the character appraisals and SPD supplement the NDTLP rather than form part of it | | | |

D Consultation Statement

| Formal consultation stage - consultee responses and action taken | | |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Organisation | Response | Action taken |
| Northern Devon Healthcare NHS Trust | <p>6 April 2021</p> <p>Thank you for your email.</p> <p>We have reviewed the Neighbourhood Plan from a Primary Care (GP Surgery) perspective and there is capacity in the local GP surgeries, primarily Caen Medical Practice, to accommodate new patients that may arise from developments in the Georgeham Neighbourhood Plan area. At present we have nothing further to add to the Georgeham Neighbourhood Plan from a health perspective.</p> <p>I note the letter was addressed to Public Health at County Hall. Our S106 Team is now the single point of contact for NHS health responses to Neighbourhood and Local Plans across Devon for Primary Care (GP Surgeries), Secondary Care (Acute Hospitals such as Torbay Hospital, RD&E) and Community Services. If you require any health input for anything else or know of any other Neighbourhood Plans trying to get an input regarding health services, please do not hesitate to contact our team on tsdft.s106@nhs.net</p> <p>Hannah O'Neill Commercial Support Manager Estates and Commercial Development Torbay and South Devon NHS Foundation Trust</p> | Comments noted. |
| South West Coast Path Association | <p>7 December 2018</p> <p>Thank you for contacting the South West Coast Path Association and the opportunity to comment on the neighbourhood plan. I am liaising with our relevant locally based volunteers and one of us will respond in due course.</p> <p>Please can you advise on timescales for the plan?</p> <p>Richard Walton South West Coast Path National Trail Officer</p> | Responded to request. The parish council has a footpath officer in regular contact with the association. |
| Sport England | <p>8 April 2021</p> <p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.</p> <p>Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities.</p> <p style="text-align: right;"><i>/ continued over</i></p> | Comments noted and additions made to the Plan to promote sport and protect sports facilities. |

D Consultation Statement

| Formal consultation stage - consultee responses and action taken | | |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| Organisation | Response | Action taken |
| Sport England <i>(continued)</i> | <p>A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence.</p> <p>It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p> <p>Planning Administration Team Planning.south@sportengland.org Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF</p> | |

E Community Action List

4.1 Background

- 4.1.1 The following issues were outside the scope of the Neighbourhood Plan or arose from the community consultation process. Whilst the Parish Council cannot resolve these matters, it can facilitate further dialogue with the community and relevant organisations to help establish an action plan. The Community Action List will be reviewed as part of the Parish Annual Assembly, and priorities will be established in consultation with residents.

4.2 Traffic management

- 4.2.1 There is ongoing discussion at Parish Council meetings about how to deal with traffic management issues. The parish's County Councillor acts as liaison with the County Highways team. The Parish Council will review and share the data from the speed monitor with County Highways once a full year's data is available. A working party of residents and parish councillors has been formed to suggest possible actions to improve traffic flow.

4.3 Assets of community value

- 4.3.1 The Parish Council will work with the Community Land Trust to explore what facilities could be registered as community assets, and will involve the public in discussion of the issues.

4.4 Plan for small business diversification

- 4.4.1 The Parish Council will initiate the exploration of opportunities with the Rural Enterprise Partnerships agency and the community on how to support business diversification, for example, the creation of a shared community work space.

4.5 Homes survey

- 4.5.1 The Parish Council will work with interested groups to complete a survey of second homes and holiday homes in the parish to inform the reviews of the Local Plan and, in due course, the Neighbourhood Plan.

4.6 Climate emergency

- 4.6.1 The Parish Council has agreed to support and work with the suggestions of the Climate Emergency Group. Councillor Gethin has coordinated interest groups in the parish.

4.7 Aspirational footpath projects

- 4.7.1 The Parish Council will advance the cause of safe walking routes linking amenities in the parish through whatever opportunities present themselves. The council is actively working towards a safer route to the school along Newberry Road.

4.8 Infrastructure review of surface water drainage

- 4.8.1 The Parish Council will seek to discuss the state of surface water drainage with South West Water and other relevant land management bodies, in the light of the expectation that future development and climate change will impact on the villages.

4.9 Design Guide

- 4.9.1 The Parish Council will consider developing a Design Guide for the entire parish for possible inclusion in the five-year review of the Neighbourhood Plan.

4.10 Environmental levy

- 4.10.1 The Parish Council will explore the possibility of an environmental levy, or tourism tax, via legal and political enquiry.

4.11 Community sports facilities

- 4.11.1 The Parish Council will evaluate the possibility of providing a public tennis court in the parish.

F SEA and HRA Screening Report

Georgeham Parish Draft Neighbourhood Plan (October 2019 version)

Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) Screening Report

**Georgeham Parish Draft Neighbourhood Plan
(October 2019 version)**

**Strategic Environmental Assessment (SEA) &
Habitats Regulations Assessment (HRA)
Screening Report**

September 2020

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F SEA and HRA Screening Report

Georgeham Parish Draft Neighbourhood Plan (October 2019 version)

Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) Screening Report

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APPENDIX ONE: STATUTORY CONSULTEE RESPONSES

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1.0 Introduction

- 1.1 This screening report is designed to determine whether or not the contents of the Georgeham Parish Draft Neighbourhood Plan (NP) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. It also includes an assessment of whether a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the Habitats Directive 92/43/EEC would be required. Under EU regulations the legal requirement for SEA/HRA depends on the content of the plan.
- 1.2 The NP is being prepared, to set out the vision for the Georgeham Parish area and the planning policies for use and development of land within the Neighbourhood area.
- 1.3 Georgeham Parish is located within coastal downland to the north-west of Braunton. The parish has a recorded population of 2,568. Its principal settlements are the villages of Croyde and Georgeham, located some 1.5 miles apart in the Crydda valley. The hamlets of Forda and Cross, and the two farms of Hole, lie between the villages. Other hamlets are Pickwell on the high ground to the north, Putsborough on the road to Putsborough beach, North Buckland to the east and Darracott to the south on the old road leading to Braunton
- 1.4 The designated area covered by the NP includes the villages of Croyde and Georgeham. Croyde and Georgeham are identified in the Local Plan as Village settlements with a single residential allocation in each village. Local Plan Policy seeks to maintain the character and appearance of the area, while adopting a positive approach to development well related to the villages that will address local housing and community needs. The Parish is located several miles to the west of Braunton which is classed as a Main Centre.
- 1.5 A significant proportion of the NP area, including both principal villages lie within the North Devon Area of Outstanding Natural Beauty (AONB) and Heritage Coast. The coastal area also includes an extensive Site of Special Scientific Interest (SSSI) between Saunton Down and Baggy Point including Croyde Beach and Burrows which is of special importance for its geological exposures, rugged cliffs and maritime habitats. The South West Coast Path follows the coastline between Putsborough and Downend crossing Croyde Burrows. There are a number of County Wildlife Sites in the vicinity of the village, including Croyde Field, Croyde Burrows and Middleborough Hill.
- 1.6 The headland ridges either side of Croyde form part of an archaeological landscape where several pre-historic sites have been identified. The centre of the village has retained its character and a conservation area has been designated in the historic core where cob and stone buildings with thatch or natural slate roofs predominate, together with numerous bridges and stone walling. Similar materials occur in the conservation area at Georgeham, centred around the Grade I listed Church of St George.
- 1.7 A range of services and community facilities are available in both villages, especially at Croyde where the majority of the tourist trade is focused. Both settlements have a post office, convenience stores, public houses, village halls, play areas and recreation facilities, and the local primary school that serves the parish is within the village of Georgeham.

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- 1.8 The NP is being prepared in the context of the North Devon and Torridge Local Plan 2011-2031. The Local Plan was formally adopted by the Council in October 2018. The Development Plan for the area will comprise both the North Devon and Torridge Local Plan and when adopted the NP, and will be used to help determine planning applications and appeals.
- 1.9 The draft NP considers the following:
- a) The size, scale and use of any proposed development (whether new build, extension or conversion) is sensitive to its surroundings;
 - b) There is no significant adverse impact (visual or otherwise) on the area's landscape in line with open space policy proposals;
 - c) Where possible, sites are screened by landform and locally appropriate features, such as trees, hedges;
 - d) On the outer fringes of the built-up settlement areas, proposals incorporate appropriate boundary treatments;
 - e) Access to the site is provided or improved to the satisfaction of the Highway Authority, and in keeping with the surrounding rural landscape, with particular attention to the needs of pedestrians and cyclists;
 - f) Proposals have a positive contribution towards open spaces, respecting the amenity, recreational and wider environment value of existing spaces and contribute to their enhancement;
 - g) Development design in settlement centres is reflective of or complementary to the existing structures;
 - h) Development proposals should take account of the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment.
- 1.10 The draft NP does not directly allocate land for development, but it provides local guidance on how applications for development in the plan area should be determined. Small scale residential development within development boundaries will be considered for permanent residency occupancy only. Exception sites will be considered if seeking to redress the balance of housing stock as identified in the Housing Needs Survey 2019.
- 1.11 The draft NP will soon be undergoing a pre-submission consultation after this screening assessment has been completed. Providing there are no significant changes to the proposals and the policies of the current draft NP, this screening assessment will satisfy the requirements to accompany the final submission of the NP.

2.0 Legislative Background

- 2.1 Establishing whether a neighbourhood plan requires an environmental assessment is a legal requirement and forms part of the neighbourhood planning process. Neighbourhood plans are required to be tested against and meet a number of 'basic conditions' set out in the Localism Act 2011. One of the conditions is whether the Neighbourhood Plan is compatible with European Union obligations, including those under the SEA Directive and Habitats Directive. Neighbourhood Plans in England require Strategic Environmental Assessment (SEA) if their effects are likely to be significant, or if the plan requires appropriate assessment under Habitats Regulations Assessment (HRA). While screening for SEA and HRA is a parallel process both are integrated here into one report.

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- 2.2 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005).
- 2.3 Neighbourhood plans are not required to undertake the type of sustainability appraisal required for a Local Plan. However, NPs may require a SEA in accordance with the SEA Directive. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 or the 'SEA Regulations'. Regulation 9 sets out the requirements to assess (screen) the plan, and includes a requirement to consult the environmental assessment consultation bodies.
- 2.4 The Local Plan was subject to comprehensive Sustainability Appraisal (SA) including SEA, which has considered the significant environmental, economic and social effects of the Local Plan for the Districts. A neighbourhood plan might require SEA if it is likely to have significant environmental effects that have not already been considered and dealt with through a SA of the Local Plan. The SA Report that accompanied the Local Plan to Examination can be found at <http://consult.torridge.gov.uk/file/3973508>
- 2.5 National Planning Policy Guidance (NPPG) advises that in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a SEA. Potential triggers may be:
- a neighbourhood plan allocates sites for development;
 - the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan;
 - the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 2.6 The Habitats Directive 92/43/EEC is another key obligation and requires that any plan or project likely to have a significant effect on a European Site must be subject to an 'appropriate assessment,' in addition to screening. The effectiveness of measures to mitigate the impact of the plan, on sites protected by the Habitats Directive, should also be tested through full appropriate assessment.
- 2.7 The Habitats Directive was transposed into English law by the 'Conservation of Habitats and Species Regulations (as amended) 2012' or 'Habitats Regulations'. HRA is the screening assessment (Reg 106(1)) of the likely effects, or impacts, of a land use proposal against the conservation objectives of European sites; and considers whether or not a proposal (alone or in combination) is likely to be significant.
- 2.8 European sites in North Devon include Special Areas of Conservation (SACs). The HRA submitted alongside the Local Plan to Examination can be found at <http://consult.torridge.gov.uk/file/3973549>. A HRA is required for all plans and projects which are not directly connected with or necessary to the conservation management of a European site's qualifying features. This also requires screening as a first step to ascertain whether a plan is likely to have significant adverse effects on the integrity of 'European' sites.

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2.9 This report therefore includes screening for SEA and HRA and uses the SEA criteria and the European Site Citations and Conservation Objectives/Site Improvement Plans to establish whether a full assessment is needed.

2.10 The report is also informed by the guidance document Screening Neighbourhood Plans for Strategic Environmental Assessment, a Neighbourhood Planning Toolkit produced by Locality.

3.0 Criteria for Assessing the Effects of the Neighbourhood Plan

3.1 The criteria for determining the likely significance of effects referred to in Article 3(5) Directive 2001/42/EC are set out in SCHEDULE 1 Regulations 9(2)(a) and 10(4)(a):

1. The characteristics of plans and programmes, having regard, in particular, to
 - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
 - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
 - environmental problems relevant to the plan or programme,
 - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
 - the probability, duration, frequency and reversibility of the effects,
 - the cumulative nature of the effects,
 - the transboundary nature of the effects,
 - the risks to human health or the environment (e.g. due to accidents),
 - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage,
 - exceeded environmental quality standards or limit values,
 - intensive land-use,
 - the effects on areas or landscapes which have a recognised national, Community or international protection status.

Annex II of SEA Directive 2001/42/EC

F SEA and HRA Screening Report

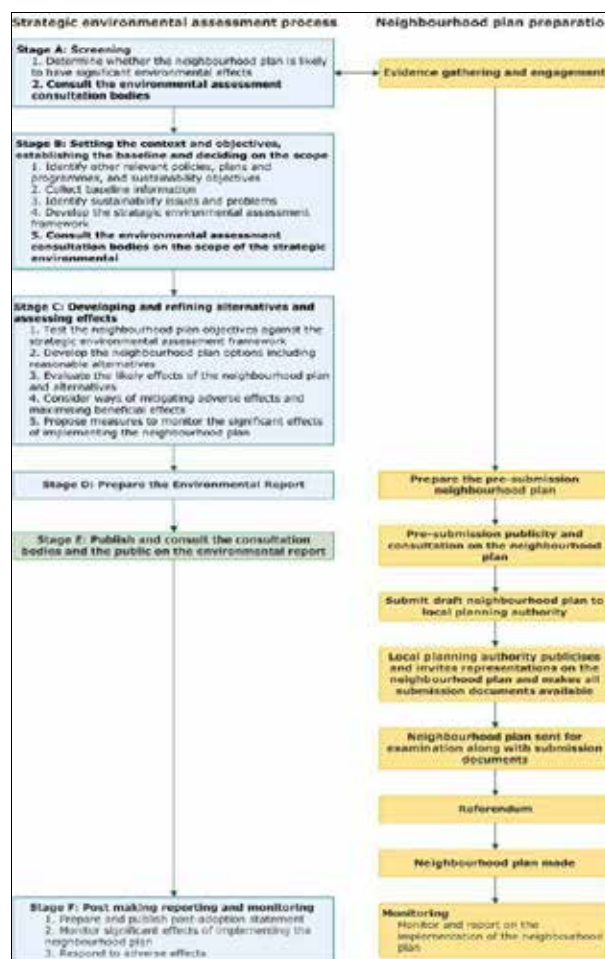
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4.0 Neighbourhood Plan Screening Assessment

4.1 Screening is ‘Stage A’ of the SEA process outlined in the Governments’ National Planning Practice Guidance (NPPG), and should be undertaken as early as possible in the neighbourhood plan process. The National Planning Policy Guidance provides guidance on when an SEA might be required:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580028/sea2_033_20150209_fixed.pdf.



4.2 Where the neighbourhood plan falls within the scope of the SEA Regulations, a determination under Regulation 9 is then required. Regulation 9 requires that the responsible authority shall determine whether or not a plan is likely to have significant effects and a) take into account the criteria specified in Schedule 1 (Annex II) to the SEA Regulations, and b) consult the environmental consultation bodies (Historic England, Natural England, Environment Agency). Where a neighbourhood plan is likely to have a significant effect on the environment an SEA (full environmental

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report) must be carried out; and where the plan is unlikely to do so, and does not require an SEA, there should be a 'statement of reasons' or opinion for the determination.

4.3 An SEA would also be necessary if the plan requires appropriate assessment under (HRA). The overall purpose of HRA is to conclude whether or not a proposal or policy or whole Plan would adversely affect the integrity of the site in question. Screening is 'Stage 1' of the HRA process, followed, if necessary, by an Appropriate Assessment. Under the Habitats Regulation 106 an assessment of the 'likely significant effects' of the Plan is the first step to be required.

4.4 The first step is to consider which European site or sites could be affected by the Plan. Policies within the NP will be screened, using assumptions from the Local Plan HRA, both in relation to how likely significant effects may result from the NP, and on a proximity basis. The screening assessment will need to consider physical damage, pollution, recreational pressure, water quantity and quality.

Will the neighbourhood plan allocate sites for development?

4.5 The draft version of the NP does not allocate sites for development.

Does the neighbourhood area contain sensitive natural or heritage assets that may be affected by the proposals in the plan?

4.6 In the context of the most sensitive assets within and in the vicinity of the NP area the following have been identified:

- Saunton to Baggy Point Coast SSSI
- North Devon Coast AONB and Heritage Coast designations cover the majority of the NP area.
- Conservation Areas in Croyde, Georgeham and Putsborough
- Listed Buildings throughout the NP area including within the villages of Croyde, Georgeham and Putsborough
- County Wildlife Sites in the vicinity of Croyde village, including Croyde Field, Croyde Burrows and Middleborough Hill
- Agricultural land in the NP area is classified mostly as Grade 3 and 4 although areas of Grade 2 surround Georgeham and to the west of Croyde village.
- Flood Zone 3 along the local watercourse and coastline only.
- Braunton Burrows SAC (core area of the North Devon Biosphere Reserve) is within 2km of the NP area boundary.
- Bideford to Foreland Point Marine Conservation Zone seaward from the high water mark

Is the neighbourhood plan likely to have significant environmental effects that have not already been considered and dealt with through the Sustainability Appraisal (SA) of the Local Plan?

4.7 The NP is more focused on local detail than the Local Plan and therefore does not introduce issues beyond that considered by the SA of the Local Plan.

4.8 The potential environmental effects which may arise as a result of the NP and if they are likely to be significant, are grouped by the SEA 'topics' as suggested by Annex I(f) of the SEA Directive.

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Biodiversity, flora and fauna, soil, water, air

- 4.9 An area of nationally designated (due to geodiversity) SSSI lies within the NP area. Of the four Saunton to Baggy Point Coast SSSI units two are in a favourable condition, one is unfavourable – recovering and one is unfavourable declining. Due to the nature of the coastal and geological designation this is unlikely to be significantly affected by the NP.
- 4.10 The entire NP area falls within SSSI Impact Risk Zones, where a location nearest the SSSI would require consultation with Natural England on the likely effects of a planning application. Due to the lack of allocations in the NP, and only indirect potential for more small-scale development in general conformity with the Local Plan, the NP is considered unlikely to lead to additional pressures on the SSSI.
- 4.11 There is a further Regionally Important Geological Site at Putsborough Sands.
- 4.12 Braunton Burrows Special Area of Conservation (SAC) lies within 2kms of the southern boundary of the NP.
- 4.13 There are three County Wildlife Sites (CWS) in close proximity to the development boundary of Croyde village.
- 4.14 There are pockets of Grade 2 agricultural land within the NP area. However no land has been allocated for development therefore there is unlikely to be a direct loss of the high quality agricultural land.
- 4.15 The NP itself does not directly allocate sites for housing or employment, and any facilitation of development is considered to be minimal, in conformity with the Local Plan and therefore unlikely to be significant in terms of the SEA Directive.

Landscape; cultural heritage

- 4.16 The NP seeks to support local design (Croyde Character Area Assessment) and protect local landscape and historic character.
- 4.17 There are Conservation Areas and listed buildings and the headland ridges either side of Croyde form part of an archaeological landscape where several pre-historic sites have been identified. There are no features identified within the Heritage At Risk register.
- 4.18 The majority of the NP area is within the North Devon Coast AONB. The draft NP contains policies which seek to protect the AONB and the outstanding landscapes of the parish.
- 4.19 The NP does not directly allocate sites for housing or employment, and any facilitation of development is considered to be minimal, and therefore unlikely to be significant in terms of the SEA Directive.

Climatic change; human health; population

- 4.20 The plan seeks to add to the quality of life and potential benefits for residents' health and well-being. No allocations are proposed to increase population pressure and although there may be some small scale development, these are considered unlikely to be significant effects in terms of SEA.

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Material assets

- 4.21 Any potential increases in waste as result of development or an increase in tourism within the area are likely to be limited due to the lack of proposed allocations through the NP.

Habitats Regulations Assessment (HRA) Screening

- 4.22 The HRA must determine if the Plan is, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites? The table below appraises the potential effects of the NP which could significantly affect European sites within or with a pathway of impact from the NP. The precautionary principle must be used when assessing whether adverse effects are significant.
- 4.23 The North Devon and Torridge Local Plan was subject to HRA which assessed the potential for Likely Significant Effects (LSE) as a result of any policies or sites. The HRA/AA Report established whether there was the potential for any adverse effect on identified European Sites (N2k sites) as a result of implementing the policies in the joint Local Plan. The HRA Screening process concluded that due to the locations of northern Devon's SACs in relation to the spatial distribution of proposed development there are no individual Local Plan led developments or site allocations which will lead to an LSE on any European Site.
- 4.24 The Screening assessment was unable to conclude that there would not be a LSE as a result of the overall quantum of development and the subsequent rise in population totals across northern Devon over the entire Plan period to 2031. The overall level of Local Plan led residential and commercial development has the potential to lead to secondary and in-direct effects which cannot be attributed to any individual site or its proximity to a SAC. These potential LSEs would occur as a result of the Plan alone and are not considered to be significantly affected by any in-combination effects with other plans or programmes.
- 4.25 The HRA considers the potential for significant adverse effects on the integrity of Braunton Burrows SAC through increased visitor disturbance, and on the Culm Grassland SAC through increased traffic on the A361 and subsequent changes in air quality. An LSE would only occur as a result of the growth in population of northern Devon over the Plan period as dictated by Policy ST07: Scale and Distribution of New Development in Northern Devon. Policy ST07 guides the overall quantum of housing and associated employment, community and infrastructure provision and will potentially lead to a rise in population, long-term traffic growth and an increase in recreational pressures.
- 4.26 North Devon and Torridge Councils commissioned a technical assessment of air quality at the Culm SAC which concluded that projected increases in traffic and vehicle related emissions resulting from Local Plan led development would not have a significant effect on site integrity. Therefore no further assessment is deemed necessary and potential impacts on the Culm SAC arising from the NP are screened out.
- 4.27 Assessment was also undertaken to determine the potential impacts of rising visitor numbers at Braunton Burrows SAC. The assessment concluded that Local Plan led development would likely result in further detrimental impacts on site integrity and that a mitigation strategy would be necessary to manage future visitor impacts. A series of visitor surveys have informed the identification of a Zone of Influence (ZOI)

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from within which any future development is required to contribute towards mitigation measures within the SAC. Implementation of the strategic Braunton Burrows SAC Visitor Mitigation Strategy will ensure current and future development within the ZOI will not result in detriment to the habitat quality or site integrity.

4.28 The NP must be screened to determine whether further Appropriate Assessment is required under the Conservation of Habitats and Species Regulations 2017.

| |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Physical damage / loss of habitat</p> <ul style="list-style-type: none"> The NP does not promote allocations in or adjacent to Braunton Burrows SAC and no growth is proposed beyond that allocated in the Local Plan. |
| <p>Changes in levels pollution</p> <ul style="list-style-type: none"> Some development is possible within the NP area although it is unlikely to lead to a significant increase in emissions from vehicular traffic or industrial (employment) as there are no direct housing or employment allocations beyond that contained in the Local Plan. |
| <p>Recreational pressures</p> <ul style="list-style-type: none"> The NP contains some support for appropriate tourism provision, but is unlikely to contribute to significant increases in visitors beyond that facilitated by Local Plan policy. The NP does not facilitate new housing or transport infrastructure which would result in increased population pressure locally. |
| <p>Water quantity and quality</p> <ul style="list-style-type: none"> The NP does not allocate housing or employment uses and therefore potential impacts on water demand or groundwater water quality are not anticipated. |

| European Site | Qualifying Features | Conservation Objectives | Pathways of impact | Likely Significant Effect | Screen in or out? |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Braunton Burrows SAC | <p>Mudflats and sandflats not covered by seawater at low tide;</p> <p>Intertidal mudflats and sandflats</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes");</p> <p>Shifting dunes with marram</p> <p>Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland *</p> <p>Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>);</p> <p>Dunes with creeping willow</p> <p>Humid dune slacks <i>Petalophyllum ralfsii</i>; Petalwort</p> | <p>Maintain and restore;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species</p> <p>The structure and function (including typical species) of qualifying natural habitats</p> <p>The structure and function of the habitats of qualifying species</p> <p>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</p> <p>The populations of qualifying species, and,</p> <p>The distribution of qualifying species within the site.</p> | <p>Minimal effects - no direct allocations so unlikely to lead to additional pressures on the SAC.</p> <p>Activities unlikely to cause air or other pollution, cause disturbance and/or physical loss or damage to habitat.</p> <p>An increases in visitor pressure in combination with Local Plan wide development</p> | <p>The NP does not directly propose development, therefore unlikely that any effects will occur above that already considered within the Local Plan HRA/AA</p> <p>All residential and tourism development within the Braunton Burrows SAC is required to contribute towards the Local Plan strategic visitor mitigation strategy</p> | <p>OUT - The NDP does not propose or facilitate development which could significantly affect the SAC</p> |

4.29 The NP does not propose specific development beyond that allocated in the Local Plan which already contains Local Plan Policy ST14: Enhancing Environmental

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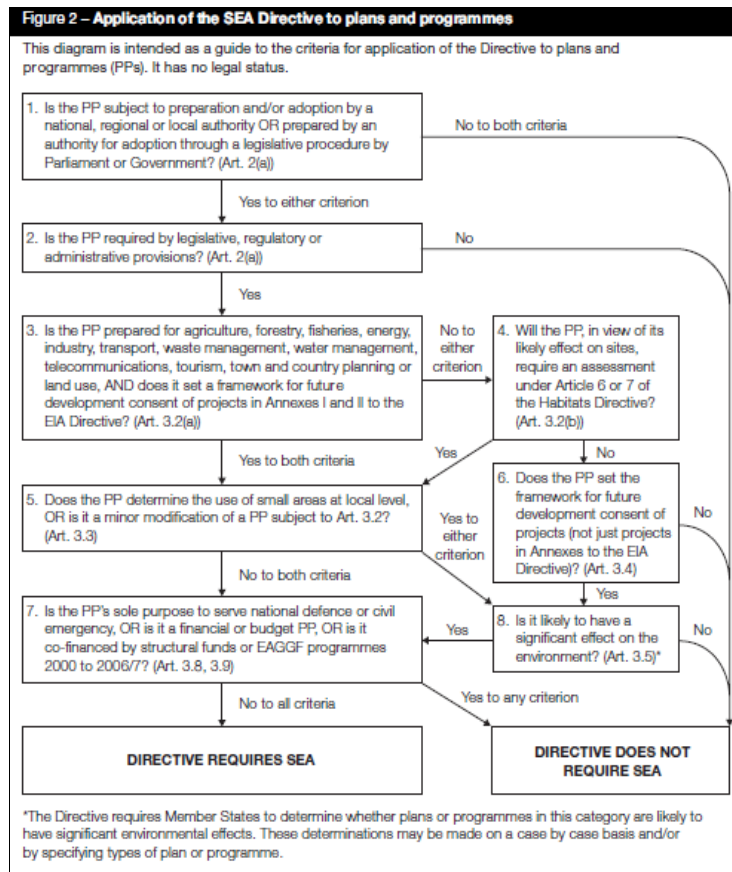
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Assets and Policy DM08: Biodiversity and Geodiversity. Development within the NP area must be in general conformity with the adopted Local Plan.

- 4.30 As a result of the assessment above, it is considered unlikely that any significant environmental effects will occur from the implementation of the draft NP that were not considered and dealt with by the HRA/AA carried out on the Local Plan. As such the draft NP does not require any further HRA work to be undertaken.

Is An SEA Screening Opinion Required?

- 4.31 The following diagram sets out how the SEA Directive should be applied and establishes the framework for the screening assessment in 4.6



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4.32 The table below shows the screening assessment of whether the NP will require a full SEA.

| Table 1: Screening Assessment | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Stage | Y/N | Reason |
| 1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a)) | Y | The NP will be 'made' by North Devon District Council as the Local Authority. The NP is prepared by the relevant Qualifying Body – Georgeham Parish Council. The NP is adopted through a legislative procedure and supports the implementation of the Local Plan. |
| 2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a)) | N | The NP is an optional plan and not a requirement according to the Localism Act 2011. The requirement for a NP to have an SEA depends on its content and therefore it is necessary to screen the likely significant environmental effects of the NP in line with the SEA Regulations |
| 3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a)) | N | The NP is prepared for town and country planning purposes, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive (Art 3.2 (a)) |
| 4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b)) | N | A HRA for North Devon and Torridge District was prepared for the Local Plan process. The HRA Screening conclusions for the Local Plan were that the overall cumulative effect of residential development across the Plan area may result in significant effects on European Sites. These were considered further in Appropriate Assessment (AA). Of the European Sites assessed in the HRA/AA Report only Braunton Burrows SAC is in close proximity NP area. A strategic mitigation plan for visitor impacts on Braunton Burrows SAC is being developed and developer contributions are already being sought for all residential development within the identified Zone of Influence. As the levels of development supported by the NP are minimal and already considered under the Local Plan HRA/AA, and the NP is not adjacent or within the SAC it is unlikely that a further HRA/AA is needed. It is considered that the NP will not affect the Braunton Burrows SAC beyond the impacts identified in the Local Plan HRA. Therefore further Appropriate Assessment is not considered to be required for the NP. |
| 5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3) | Y | The NP will apply to a wider area than a small area (like a building plan) but it is at local level. – 'only requires SEA if it is likely to have significant effects' (article 3 (3)). It is not a minor modification to an existing plan. |
| 6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4) | Y | An NP is (a framework) to be used in determining future planning applications, and once 'made' will form part of the statutory development plan. Local Plan allocations are a wider framework for the District including this area. The NP does not make allocations and so does not in this specific sense set a 'framework for future development consent' or beyond those projects listed in the EIA Directive, but it does set a framework more generally. |

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| 7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9) | N/A | The (sole) purpose of the NP is not for any of those categories listed in Art 3.8,3.9. |
| 8. Is it likely to have a significant effect on the environment? (Art. 3.5) | No | <p>The NP does not make any housing or employment allocations and as such there is no major level of proposed development to impact upon environmentally sensitive areas. It is considered there would be little or no impact on the nationally recognised designation of the AONB, SSSI, Conservation Areas, or to the risk of flooding within the Parish. The NP is in relatively close proximity to a European Natura 2000 Site (SAC) although any potential impacts have been addressed under the Local Plan.</p> <p>More locally there are several County Wildlife Sites and a County Geological Site within the NP area. There are also Conservation Areas in Croyde, Georgeham and Putsborough and numerous Listed Buildings.</p> <p>The NP has policies on design, and appropriate development within the Parish, which has already been identified for growth in the Local Plan. The NP refers to local guidance Croyde Character Area Assessment and how applications for development in the plan area should be determined. The impact of any potential development (in general conformity with the Local Plan) with no direct allocations is therefore expected to be localised and minimal and therefore unlikely to be significant.</p> |

4.33 Given the 'Yes' responses above, it is considered that the NP is within the scope of the SEA Regulations and a screening opinion is required.

Assessment – Are there likely significant effects?

4.34 Screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects on the environment:

- The characteristics of the Plan itself and
- The characteristics of the effects, and of the area likely to be affected by the plan

| Table 2 likely significant effects | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SEA requirement | Comments |
| The characteristics of plans and programmes, having regard, in particular, to: | |
| 1. the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources | The NP will set out the framework to be used to determine proposals for development within the Parish. The NPs focus regarding housing development is to provide policies to help inform the application of Local Plan policies. The NP policies include measures which seek to ensure that heritage assets, landscape character and community assets are protected and that future tourism and economic development is appropriately designed. The NP does not allocate land for development or propose development in excess of that allocated/identified within the North Devon and Torridge Local Plan. |
| 2. the degree to which the plan or programme influences other plans and programmes including those in a | The NP must be in general conformity with the National Planning Policy framework and the Local Plan and provides polices for the Parish area. None of the policies in the NP are |

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| hierarchy | likely to have a direct impact on other plans in neighbouring areas. |
| 3. the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development, | A NP is required to contribute to the achievement of sustainable development. It is not specifically a plan for integrating environmental considerations. Any development must also be in accordance with the NPPF and in general conformity with the Local Plan. |
| 4. environmental problems relevant to the plan or programme, | The NP does not allocate land for housing or employment use, therefore any adverse impact on the environment arising from the NP proposals is considered to be minimal and unlikely to be significant. There are no specific environmental problems that have not been assessed and considered through the Local Plan and its accompanying SA. |
| 5. the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection). | The NP is in general conformity with the Local Plan and other relevant plans and national policy. Therefore the implementation of community legislation on water protection or waste is not relevant to the NP. |
| Characteristics of the effects and of the area likely to be affected, having regard in particular to: | |
| 6. the probability, duration, frequency and reversibility of the effects, | The NP doesn't provide for significant growth above the Local Plan Housing target. It is considered unlikely that proposals in the NP will lead to significant irreversible, long or short term or frequent adverse effects on the environment, as there is no direct allocation or change of use of land. The NP seeks to minimise the negative effects of any potential development and promote positive impacts to enhance and conserve. |
| 7. the cumulative nature of the effects, | The NP does not seek to increase development rates above local need, or significantly above the requirements of the North Devon and Torridge Local Plan. Any cumulative impact of development within the NP area on the Braunton Burrows SAC is already considered within the strategic HRA/AA in support of the Local Plan. |
| 8. the transboundary nature of the effects, | Effects will be local with limited effects on neighbouring areas as the proposals within the NP only apply to the designated area. |
| 9. the risks to human health or the environment (e.g. due to accidents), | No risks have been identified. |
| 10. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected), | Georgeham Parish covers an area of approximately 1,740 hectares. The 2019 census recorded a population of around 2,568. The facilitation of development in the NP is considered to be minimal, and therefore unlikely to be significant in terms of the SEA Directive. No proposals will be large scale and extensive in terms of area or population size, although they are within a sensitive nationally designated area (AONB) and have an SSSI within its boundary. |
| 11. the value and vulnerability of the area likely to be affected due to: - special natural characteristics or cultural heritage, - exceeded environmental quality standards or limit values, - intensive land-use, | Saunton to Baggy Point Coast SSSI https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002073&SiteName=Saunton%20to%20Baggy%20Point%20Coast&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea= North Devon AONB https://www.northdevon-aonb.org.uk/about/management-plan-2019-2024 Middleborough Hill County Wildlife Site, Croyde Burrows County Wildlife Site and Croyde Field County Wildlife Site https://www.georgehamparishcouncil.gov.uk/notices/parish-biodiversity-audit/ Croyde, Georgeham and Putsborough have Conservation Areas https://www.northdevon.gov.uk/council/strategies-plans-and- |

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| | policies/environment-and-planning-policies/local-plan/planning-policy-supporting-documents/environment/conservation-area-character-appraisals/ |
| 12. the effects on areas or landscapes which have a recognised national, Community or international protection status. | <p>The NP boundary is within 2km of the Braunton Burrows Special Area of Conservation (SAC), is largely within the North Devon Coast AONB and contains a SSSI. http://publications.naturalengland.org.uk/publication/5092780342771712</p> <p>The NP is unlikely to lead to additional pressures on the European designated SAC or nationally designated SSSI's, or AONB as it does not allocate or change the use of land for development within or in close proximity of these designations, therefore increasing population and its associated pressures.</p> <p>The Local Plan development site allocations are unlikely to affect the coastal SSSI due to the existing settlement form being some distance from the coast.</p> <p>Any proposed development may have a potentially significant impact on the setting of a listed building or conservation area for example and therefore the effects are uncertain. Local Plan policies would however already apply in this case.</p> <p>There is unlikely to be intensive land use, particularly on the sensitive coastal fringe or the SSSI and therefore the NP will not affect the value and vulnerability of the area.</p> <p>Overall there are unlikely to be significant environmental effects, due to the nature of the proposals in the NP, that should be investigated through SEA.</p> |

5.0 SEA & HRA Screening Conclusions

- 5.1 National Planning Practice Guidance (NPPG) states that a neighbourhood plan might require SEA where it allocates sites for development or the neighbourhood area contains sensitive natural or heritage assets and likely to have significant environmental effects that have not already been considered and dealt with through a SA/HRA of the Local Plan.
- 5.2 No allocations are proposed within the draft NP although there is clear provision of local guidance on how applications for development in the plan area should be determined.
- 5.3 In accordance with Regulation 106(1) of the Habitats Regulations, North Devon Council, as the 'competent authority,' does not consider that an 'appropriate assessment' under Regulation 105 is required in addition to that undertaken in support of the Local Plan.
- 5.4 As a result of the above Screening assessment it is considered unlikely that there will be any significant environmental effects arising from the draft NP, that have not already been previously assessed in the SA or the HRA/AA of the Local Plan.
- 5.5 The Screening assessment was provided to the statutory environmental consultation bodies (Historic England, the Environment Agency and Natural England) for their opinion. Consultation took place between Tuesday 28th July and Tuesday 1st September 2020. The views of the statutory consultees are appended to this report.

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- 5.6 **Following consultation with the statutory environmental bodies on the SEA Screening assessment and in accordance with SEA Regulation 9, North Devon Council as the 'responsible authority', has determined that the draft NP is unlikely to have significant environmental effects and can therefore be 'screened out' i.e. that no Strategic Environmental Assessment is required.**
- 5.7 A notice of this determination will need to be available for public access within 28 days of the date of the determination (in line with SEA Regulation 11).
- 5.8 If the draft NP should change, a new screening will need to be undertaken. New development proposals will be determined in line with the Local Plan and the NP and may individually require screening for Environmental Impact Assessment (EIA) based on their type, scale and location.

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APPENDIX ONE: STATUTORY CONSULTEE RESPONSES

1.1 Environment Agency

From: SPDC <SPDC@environment-agency.gov.uk>

Sent: 05 August 2020 09:00

To: Mark Saunders <Mark.Saunders@northdevon.gov.uk>

Subject: RE: Ref 200731/JC02 Georgeham Parish Neighbourhood Plan - Screening Opinion for SEA/HRA

Dear Mark,

Thank you for your consultation of 28 July 2020 providing us with the opportunity to comment in respect of the Georgeham Parish Neighbourhood Plan SEA/HRA screening opinion.

In general we consider that it is unlikely that neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.

Please note, this is a standard response. If you consider the plan will result in significant environmental effects please reconsult us.

You may receive a quicker response time if you send any planning-related queries direct to the Devon and Cornwall Sustainable Places team at SPDC@environment-agency.gov.uk rather than via the national enquiries unit.

Kind regards

Sarah Squire MRTPI

Sustainable Places – Planning Advisor

Environment Agency – Devon, Cornwall and the Isles of Scilly Area

Tel: 0208 474 6316

Email: SPDC@environment-agency.gov.uk

Sir John Moore House, Victoria Square, Bodmin, Cornwall, PL31 1EB
Manley House, Kestrel Way, Exeter, Devon, EX2 7LQ

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1.2 Historic England

From:Stuart, David <David.Stuart@HistoricEngland.org.uk>

Sent:01 September 2020 10:00

To:Mark Saunders <Mark.Saunders@northdevon.gov.uk>

Subject:Georgeham Parish Neighbourhood Plan - Screening Opinion for SEA/HRA

Dear Mr Saunders

Thank you for your consultation on the SEA Screening Report for the emerging Georgeham Parish Neighbourhood Plan.

I can confirm that based on the information provided, and particularly that the Plan does not propose to allocate sites for development, we have no objection to the view that a full SEA is not required.

Kind regards

David

David Stuart | Historic Places Adviser South West
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

Historic England | 29 Queen Square | Bristol | BS1 4ND
<https://historicengland.org.uk/whats-new/in-your-area/south-west/>

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1.3 Natural England

Date: 1st September 2020

Our Ref: 325163

Your Ref: Georgeham Parish Neighbourhood Plan - Screening Opinion for

Mark Saunders
Planning Policy
North Devon Council
Barnstaple

Natural England,
Sterling House,
Dix's Field,
Exeter,
EX1 1QA

BY EMAIL ONLY

Mark.Saunders@northdevon.gov.uk

T: 0300 060 3900

SEA/HRA



Dear Mr Saunders,

Georgeham Neighbourhood Plan Screening Opinion for SEA/HRA

Thank you for your consultation on the above dated 28th July 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Habitats Regulations Assessment

Natural England agrees with the conclusion that Appropriate Assessment is not required for this Neighbourhood Development Plan. However, should future changes to the Plan result in site allocations or the identification of a development boundary that differs to the one adopted in the 2018 Local Plan then an Appropriate Assessment would be required, due to the likely potential for increased recreational pressure on the Braunton Burrows SAC.

Natural England does, however, advise that the Plan should make it clear that the identified development boundaries are those from the adopted Local Plan and are not being proposed as part of the Neighbourhood Plan.

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Strategic Environmental Assessment Screening

Natural England agrees with the conclusion that full SEA is not required, on the basis that the Plan is not allocating development sites or identifying a development boundary.

However, in line with the comment made above, should the Plan include site allocations in the future then where a Neighbourhood Plan requires an Appropriate Assessment under the Habitats Directive, Article 3.2 of the SEA Directive also requires a SEA to be undertaken.

We cannot offer advice on how the relevant legislation should be applied or interpreted and recommend the LPA seeks its own legal advice as to whether a SEA would be required in that case.

In conclusion, Natural England advises that the Neighbourhood Plan should make it clear that the Development Boundaries it refers to are those that were adopted in 2018 as part of the North Devon & Torridge Local Plan, and are not new proposals in the Neighbourhood Plan. The identification of development boundaries are effectively site allocations, if they include developable land, and as such could trigger the need for HRA and SEA.

For any queries relating to the specific advice in this letter only please contact Stephanie Parker-Stephenson on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Stephanie Parker-Stephenson

Lead Adviser (Sustainable Development)

Devon, Cornwall and Isles of Scilly