

Your Ref: 02/AM/GNP
Our Ref: ED/GNP/02
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Date: 12 August 2021



Mr Andrew Mead
Intellegent Plans and Examinations
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BY EMAIL ONLY

Dear Mr Mead

I write further to your correspondence of the 3rd August 2021 regarding the examination of the Georgeham Neighbourhood Plan. Please find set out below a response to the questions you directed to the District Council in that correspondence.

Policy H1

1. How does the principal residence policy generally conform with the strategic policies of the North Devon and Torrridge Plan?

The council consider that the purpose of policy H1 is to ensure that the specific local need of ensuring the provision of open market housing for the local community is met and as such this approach is in general conformity with the strategic policies of the North Devon and Torrridge Local Plan. In particular, policy ST07 states "Development will be supported...to achieve an economically resilient and active rural area." The supporting evidence in the neighbourhood plan (appendix 14 'CARA submission, appendix 17 'Principal Residence Occupancy' to the neighbourhood plan) demonstrates that there is a significant number and proportion of second homes within the neighbourhood plan area, and policy H1 will seek to assist in the rebalancing of the local housing market to help the local community.

Policy H1 is in general conformity with NDTLP ST08 as it is not seeking to reduce the contribution of housing within the Georgeham neighbourhood plan area in relation to the planned provision across the NDTLP area of 17,220 dwellings. In addition, policy ST17: A Balanced Local Housing Market, seeks to ensure that residential development proposals delivering this housing do so in a way that contributes to the re-balancing of the housing stock to help it better reflect the identified needs and demands for housing of existing and future communities of northern Devon.

As there is no mechanism within the neighbourhood plan to prohibit second homes being acquired through the existing housing market there will still be opportunities for such properties to still be available within the parish which conforms with policy ST13: Sustainable Tourism.

2. What is the reasoning behind the exclusion of like-for-like dwellings from the principal residence policy?

NDC do not see a specific rationale for the exclusion of like-for-like (replacement) dwellings from the policy, rather considered it appropriate to support the neighbourhood planning group with their expressed aspiration within the policy. It is noted that as written, such a policy may result in owners of second homes being able to develop a replacement dwelling and then sell the new build on the open market, which is not necessarily the intention of the policy.

Policy NE3

5. Policy NE3 states that policies for managing development within a Local Green Space (LGS) should be consistent with those for Green Belts and then refers to the Green Space Policy Compliance Statement on pages 30-36 of the Plan, which includes accurate references to the NPPF (albeit the paragraph numbers of which will require updating to reflect the 2021 NPPF). In the Regulation 16 consultation response, the District Council recommend adding a significant amount of detail to the policy to assist applicants, the community and decision makers and make a specific suggestion.

However, given the NPPF advice and the quantity of case law concerning managing development in the Green Belt, my initial conclusion is that the policy should merely state: *“Local Green Spaces (LGS) are defined at: The Rabbit Field, Croyde; Croyde Village Green; Croyde Village Car Park; Georgeham Recreation Ground and Georgeham Glebefield and Green. Policies for managing development within the LGS should be consistent with those for the Green Belt and development should not be approved except in very special circumstances.”* I would be pleased to have comments from both Councils.

NDC acknowledge that both the NPPF advice and case law do limit the scope for the wording of a local green spaces policy. As such your proposed wording is acceptable in principle, however there remains a concern that an applicant or the local community may not fully understand what is meant by ‘very special circumstances.’ Therefore it is suggested that reference is made in either the policy or the supporting text to the section of the NPPF which provides the detailed proposals affecting the green belt.

National Planning Policy Framework July 2021

10. A revised version of the National Planning Policy Framework was published by the government on 20 July 2021, alongside a final version of the National Model Design Code. I would be grateful if you could please advise me whether you consider any modifications in relation to the non-strategic matters covered by the draft GNP are necessary as a result of the publications and, if so, what these are?

Having reviewed the revised National Planning Policy Framework and the final version of the National Model Design Code, NDC do not consider that any modifications are necessary in relation to the content of the plan, other than the updating references to the revised date of the NPPF and paragraph numbers in the NPPF in section 9.3 of the neighbourhood plan.

In addition, references in the basic condition statement will need to be updated.

Yours sincerely

**Elizabeth Dee
Senior Planning Policy Officer
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