



Summary of Representations to the Georgeham Neighbourhood Plan (Regulation 16 Consultation)

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Table 1: Summary of Representations to the Georgeham Neighbourhood Plan (Regulation 16 Consultation)

Reference	Name of contributor	Comments
GNP1	Julian Cox	<p>There is not a clear statement of aim. If the aim is to have a viable thriving community of mixed age/social demographics then a significant change in this plan will be needed to prevent an inevitable decline to a tourist ghost town. Developers will otherwise continue to chip away at the boundaries to extract maximum profit, create larger properties, resulting in property prices increasing in cost, and only those with significant money, (South East) will buy up properties as second homes or to move with remote working. If the aim is to have a pretty tourist town then this should be stated. There cannot really be a compromise as the decline will happen from market forces alone. I am not political but there is clear evidence that capitalism is driving this and there must be positive steps to reverse this, if you like, social engineering:</p> <p><u>Infrastructure:</u></p> <p>There is insufficient on infrastructure, particularly roads:</p>

Reference	Name of contributor	Comments
		<p>1) Safer access with extensions to, and creation of footpaths particularly Georgeham to Croyde</p> <p>2) Creation of cycle paths separated from both pedestrians and road users</p> <p>3) The road from Braunton fire-station to Georgeham is talked of as "the back road" to Croyde. This should be discouraged with suitable signage or the road improved significantly with creation of two-way stretches and cycle lanes, taking land from fields and pushing back Devon banks where necessary. Roads should be properly maintained with quality resurfacing, not intermittent and inefficient top-dressing that leads to accumulation of piles of grit on corners, causing skid risk for both cars and bicycles.</p> <p>4) Widening of passing places elsewhere particularly Georgeham to Putsborough</p> <p>5) Consideration of temporary one-way systems</p> <p>6) Restriction of parking e.g. Putsborough to reduce load with signage in Georgeham to say when full.</p> <p>Those earning most from tourism could most pay for the improvements, particularly those with car-parking and camping windfalls but also by business rates on holiday lets.</p> <p><u>Balanced demographics with focus on younger generations:</u></p> <p>The 2011 census is mentioned repeatedly. The statement: "There is a need to keep and attract more young people and families to maintain a permanent, resilient and diverse community" is not defined sufficiently.</p>

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		<p>We should have access to the figures for the 2021 census so the figures can be updated and new comparisons made.</p> <p>1) There is insufficient "trickle down" of tourism money to others. There is land banking and "exploitation" of tourism with money staying with a relatively small number of individuals. Wages are low for young people employed locally, yet those with car-parks, camping, holiday houses, developers, have spectacular earnings. Need greater local taxes to address this and reinvest in both infrastructure and local authority employment projects to reverse emigration of young people from this area to cities.</p> <p>2) The plans for housing development are woefully low on affordable housing. Should be around 80% or more for any future building to ensure a rebalance in demographics and absolute restriction to permanent residence. Council will need to resist developers, fight appeals fully. Use money from tourism as above to pay for it.</p> <p><u>Wider area:</u></p> <p>There is insufficient relating to the wider area including areas such as Darracott, North Buckland etc as these are suffering the same pressures, for example, planning permission for a small estate in Darracott given outside of any development area. This decision can be reversed as building work has not begun. Effectively, these areas will simply merge with Georgeham and Croyde, in people's consciousness at least, if not geographically. These areas should be steadfastly protected to prevent "creep" with ribbon development and infilling.</p>
GNP2	Mr David Sanders	<p>I am a local resident in Croyde and consultant at North Devon District Hospital. I support the preservation of the green spaces in Croyde and in particular the fields to the South of the village above Cott Lane which run over to Saunton ridge.</p> <p>The local infrastructure (traffic, sewage, beach) struggles with the influx of tourists and I would suggest that the number of caravan and campsites, which allow large numbers into the village</p>

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		<p>should be limited. Second homes and self catering accommodation are less of a problem with regard to infrastructure.</p> <p>Traffic congestion is a terrible problem in peak holiday months, with roads between Georgeham and Croyde often not passable and in can take over an hour to travel half a mile. A one way system during these peak times may help.</p>
GNP3	Tony Marley	<p>My family have lived in Croyde for over 20 years. We are in full support of the Neighbourhood Plan and want it to be adopted.</p> <p>It is important that this plan is adopted as soon as possible so that it is taken into account with future Planning Applications. This will hopefully allow affordable homes for people that live and work in the village.</p>
GNP4	Georgeham Parish Community Land Trust	<p>Georgeham Parish Community Land Trust is a “not for profit” community benefit society run by local volunteers with a connection to the Parish for the benefit of the Parish Community.</p> <p>Its primary objective, at this time, is to provide housing that people who live or work in the Parish can afford to live in.</p> <p>Such housing is very much needed to sustain the local community going forward.</p> <p>Local people are finding it increasingly difficult to rent or buy homes in the community where they grew up or have lived and worked in for many years. The competition for houses from commercial holiday let and second homeowners (many of whom are from out of the area and on much higher incomes) is pricing local people out of the community or leaving adult children living at home long term with their parents if they want to remain in the Parish.</p> <p>Existing housing stock that comes onto the market is bought for holiday lets or second homes and is often adapted for this purpose by introducing additional bedrooms to fit more people in. The new layouts are geared up for holiday living rather than permanent living. Similarly</p>

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		<p>new houses that are being built are also being designed more with the holiday let market in mind having more bedrooms, more bath/shower rooms and ensuites, smaller gardens and reduced storage space. There is often insufficient parking provision within the property concerned to meet the additional accommodation capacity. This has a knockon effect on the principal residence community, a significant proportion of whom are reliant on street parking and are finding that they are competing for parking places with visitors to increased accommodation capacity houses with insufficient parking or people parking on pavements or double yellow lines or on lawns.</p> <p>This year in particular, local businesses are facing challenges in hiring seasonal staff through issues with transport to get them into and out of the Parish especially those working later shifts and also from staff wanting to live in the Parish and work finding there is no affordable accommodation and/or capacity especially during the busy summer season.</p> <p>This all impacts adversely on maintaining a sustainable resident community in the Parish.</p> <p>The policy proposals made in the Georgeham Parish Neighbourhood Plan are very welcome bringing to the fore the need to provide greater balance within the Community by promoting principal residence ownership and attributing more weight as to how new development impacts on the setting of the North Devon Coast Area of Outstanding Natural beauty and heritage assets and conservation areas.</p> <p>At the moment new housing is often built in the wrong place, for the wrong purposes/having an inappropriate design leading to consequent adverse effects on the community, the landscape and the environment.</p> <p>There are very few one, two and three bedroom homes.</p> <p>We hope that the policies in the Neighbourhood Plan will start to redress the current imbalances.</p>

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		<p>We hope that the Neighbourhood Plan will be as effective as possible in achieving the aims of supporting a sustainable community in the future and ensuring that the Parish's natural landscape, environmental and heritage assets are properly protected now and in the future for all to enjoy.</p> <p>Finally, it is noted that the planning department recently cited the lack of an evidenced adequate 5 year housing supply in North Devon as a whole, as justification for building a couple of market value houses in the Parish, outside the development line, on a greenfield site in the AONB, making no provision for or towards affordable housing. The Parish has already far exceeded the minimum number of new houses it is to provide in the Local Plan 2018 – 2031.</p> <p>Given the current parlous situation with housing for the community, this is a disturbing development. The CLT would like to see the Neighbourhood Plan finding a way to address this by ensuring that all housing in the Parish, including housing outside the development line is for principal residence only at this time. This should impact on the demand for such property and hopefully the market value.</p> <p>In the particular circumstances of this Parish, having both a pressing need for affordable housing for local people, having a community whose sustainability is under threat, and being in an AONB we need the Neighbourhood plan to deliver a strict planning policy so that all building outside the development boundaries, without exception, achieves the delivery of affordable housing, only allowing open market units where this enables and significantly contributes to the provision of affordable housing.</p> <p>We would also like to see if the Neighbourhood Plan (if not at this stage, then maybe at a later one) can introduce some form of levy or contribution to be put towards affordable housing for the local community in the Parish or towards other community owned assets.</p>

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		<p>We also welcome policy SC1 - Community facilities and would like consideration to be given at some stage to registering assets of community value such as the village shops/post offices in Georgeham and Croyde with the local authority.</p> <p>Conclusion.</p> <p>The CLT wholly supports the Neighbourhood Plan.</p> <p>We hope that the Neighbourhood Plan is drafted in such a way that the purpose of the policies will be achieved and will not suffer from interpretations different to that which is intended. Is there any mechanism for the local planning authority and Parish representatives meeting to ensure that there is alignment between everyone in this regard?</p>
<p>Croyde Area Residents Association</p>	<p>GNP 5</p>	<p>ARA is an unincorporated residents association and charity that was formed in the 1970s with the purposes of protecting and preserving this area as one of outstanding natural beauty.</p> <p>The CARA Committee whole heartedly supports the proposals made in the Georgeham Parish Neighbourhood Plan. It is a well evidenced document that highlights challenges that the Parish is facing now and will continue to face in the future. The policies proposed present a valiant attempt to address these in a constructive and balanced way and we support them.</p> <p>Georgeham Parish is predominantly an area of rural and coastal countryside with beautiful landscapes and seascapes, the overwhelming majority of which is in the North Devon Coast AONB. It is home to historic rural villages and hamlets, whose history is predominantly based in agriculture. People have lived in the area since pre historic times and there are important heritage assets and sites of special scientific interest.</p>

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		<p>The Parish's current economy is largely tourism based, particularly during the warmer months when camping for example is very popular.</p> <p>Most new houses or existing homes that go up for sale are bought for second homes and/or commercial holiday lets.</p> <p>Additionally more people from outside of the area have started buying homes here with the move to work from home in some sectors of the UK economy over more recent years and in particular during the pandemic. Some of these are second homes owners and some become permanent residents. The average wage of local people is well below the national average and local people and their families cannot compete with the prices for homes in the Parish that have been driven up by the tourism industry and newcomers on higher salaries.</p> <p>The result has been that new homes are being designed predominantly for holiday lets/second homes where good sized gardens and permanent residence driven storage solutions and proper parking do not attract the same importance as they would to someone living permanently in the Parish. The houses being built are not (for the main part) for the permanent resident market and they are not affordable for local people or suited to their needs. There are very few one, two and three bedroom homes.</p> <p>There has been a move in the last three or four years to knock down family homes and build larger volume mass and higher houses close to neighbour's properties, often with outdoor living areas at height. This has unfortunately in some instances resulted in serious permanent privacy invasion and nuisance issues for neighbouring properties – especially when those properties are let out for holiday makers who are at the accommodation for longer periods and socialising for longer periods than people who live and work in the Parish normally do.</p> <p>We are pleased to see that policies in the Neighbourhood Plan should address these issues. For the future we would like the implementation of a Design Guide to be considered for new houses and other new buildings in the Parish which ensures that new buildings do not</p>

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		<p>have an over urbanising town/city like impact on the villages and hamlets but are sympathetic to the rural countryside and coastal vistas and the historic buildings and conservation areas.</p> <p>Where possible new houses should be set far back from the frontages to the roads and in any event should not advance beyond current frontage building lines.</p> <p>Development should be in keeping with the rural and coastal countryside of the AONB, heritage assets and historic conservation areas. It should not have an over urbanising city and town like effects causing harm to the AONB, its peace and tranquility and to quaint historic village centres with chocolate box cottages and thatched and slate roofs and colourful gardens and hedgerows and devon banks and traditional stone and cobb walls and walling.</p> <p>Whilst it is readily acknowledged that tourism is a very important part of the local economy the pressures of the demands of tourism are causing rapid changes to the landscape, seascapes, the natural environment, the sustainability of the parish community and the infrastructure upon which it is dependent.</p> <p>Principal residence homes are needed in the future to help prevent green fields from being used up to satisfy holiday home and commercial holiday let demands. This condition needs to be applicable outside the development lines too – otherwise the green fields of the AONB outside the development lines will be under pressure from these demands and it will be hard for the planning authority to resist if government demands more housing to meet its 5 year housing supply, irrespective of where that housing is provided. This is incredibly worrying given the impact on the AONB and given that the Parish has already over provided and far exceeded the minimum number of houses it has to provide until 2031 under the Local Plan and it is only 2021. We have no objection to the provision of houses for permanent homes that will sustain the community but have grave concerns about the current situation where houses are being built for commercial enterprise for short term holiday lets. The vast majority of the current housing stock has been appropriated for this purpose and unless the principal residence</p>

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		<p>condition can bite effectively there is little chance of regaining any semblance of balance for the Parish Community and the AONB and environment.</p> <p>A significant proportion of the infrastructure is old. The water, sewage and drainage system was constructed many years ago and much of it is coming to the end of its useful life. The system was not designed to deal with the rapid increase in new houses/apartments, replacement of old houses with new much larger ones with many more bathrooms and significantly enlarged existing homes. The system is not designed at all for the exponential rise in numbers of people staying in the seasonal campsites – whose seasons have been substantially increased in the last year alone. The roads in the Parish are mostly narrow (often single track) country lanes without pavements often housing rich biodiverse habitats in their hedges and Devon banks.</p> <p>Visitors to the area are already commenting on how built up, the village of Croyde in particular, is becoming. The AONB is one of the main attractions of the Parish so it is worth preserving properly. It is also provides a variety of habitats providing homes to an incredible range of flora fauna.</p> <p>Removal of hedges and Devon banks and the increase of light and other pollution is posing an incremental threat and we would like to see hedges and banks being retained or recreated and window panes and lighting in the AONB having minimum light pollution impact whether through size of windows and lighting and placement and/or through the type of materials utilised for this</p> <p>The issues of concern to many residents are:</p> <ol style="list-style-type: none"> 1. The impact of development on the AONB and the environment. 2. The future sustainability of the Parish village and hamlet communities and the services, amenities and facilities to properly sustain them.

Reference	Name of contributor	Comments
		<p>3. The ability of local businesses to function properly with employees being able to live in the area and/or have adequate transport to get them to and from work</p> <p>If possible, we would like to see certain policies in the Neighbourhood Plan being expressly given much greater weight than others.</p> <p>As in statute, policies relating to the landscape environment and heritage assets should have much more weight and take priority over other policies. The exception being affordable housing and affordable housing should only have any weight if it will be housing that local people can afford in perpetuity.</p> <p>Often children brought up in the Parish live as adults with their parents or move away;</p> <p>There are too few one two and three bed homes. Most have been adapted to have more bedrooms for holiday lets or to fit growing families as the families cannot afford to move out of the house they are in.</p> <p>Turning to campsites which are an important part of the local economy, we think they provide an important and less impactful permanent impact on the landscape and the environment in most cases. It would be helpful, given their number and capacity for visitors, if any further plans for development of them could specifically include consideration of impact on infrastructure. Year round camping/caravanning is not something that we believe should be encouraged because of the impact on the fields of the AONB. There should be part of the year where the fields are clearly visible without tents caravans or motorhomes or other campsite related structures on them. This affords a recovery period for the fields in colder/muddier months. It also helps avert risks of development via the back door from certificates of lawful development and use. Year round camp/caravan site use can lead to permanent development through certificates of lawful development or use. Development via such certificates bypasses all planning policies to protect the AONB and heritage assets etc and are not therefore an appropriate method of development in the Parish, the vast majority of which is in the AONB;</p>

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		<p>The Parish has the Crydda valley running through it and substantial quantities of water (especially with the increase in built structures) runs down to the centre of the valley and the Crydda stream during heavy rains or where there are prolonged periods of rain. Flooding is an increasing risk in some residential and commercial areas. The drains cannot always cope and there are overflows into fields in the centre of the valley. Run off goes into the Bay and the sea and affects water quality. South West Water and Environment Agency records show that the frequency of controlled releases from the Croyde sewage plant and the volumes released have both increased markedly in recent years. This affects water quality and may adversely impact people visiting the Bay, surfing and other water sports.</p> <p>Conclusion</p> <p>Whilst the Neighbourhood Plan goes a significant way to encourage thoughtful considerate and balanced development in the Parish in the right places, given the scale of demands and changes that are being made on the Parish we would like to ensure that the Plan properly addresses and will stand up to the following specific challenges that we have identified:</p> <ol style="list-style-type: none"> 1. Ensure it is clear that the environment and the AONB, heritage assets and conservation areas take precedence over all other policies. Tourism demands and needs (which are often for part of the year) should not be a driver for permanent changes that impact adversely on the protected landscape of the AONB and/or heritage assets; 2. Ensure that exception sites are affordable for local people in this area and such housing is kept that way in perpetuity; 3. Design guide for development in the area to be a next aim; 4. Principal residence condition to apply throughout the Parish given the recent incidence of permission for market value housing having been granted on a small field outside of

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		<p>the development line because of North Devon's inability to demonstrate an adequate 5 year housing supply;</p> <p>5. Non coalescence via new development between the various Villages and hamlets</p> <p>We are very happy with what the Neighbourhood Plan proposes– if it is possible to include some of the above in the neighbourhood plan that would be great even if it is included in the aims or as an intention to be looked at in the future.</p>
GNP6	Natural England	<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>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on the Georgeham Neighbourhood Plan.</p>
GNP7	The Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make on it.
GNP8	Barbara Spears	<p>As a full time resident of Croyde I have read thoroughly and with personal interest this plan. I fully support every aspect of it.</p> <p>It has been worked on for a long time now by local people devoted to preserving what is best in this Area of Outstanding Natural Beauty while taking us forward without destroying the reasons we chose to live here and what the visitors are attracted by.</p>

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		I am very glad it will be referred to in future planning decisions - can't be soon enough. Please speed this through as many many currently proposed planning applications nowhere near adhere to what is in my opinion best for the area.
GNP9	Joanna Luxton	<p>I write as a permanent resident of Croyde. In general I applaud what the plan is trying to do, although the local council should never have allowed such indiscriminate permission to build in the first place.</p> <p>The horse also seems to have bolted as far as ameliorating the traffic is concerned as there it would be undesirable (if not unfeasible) to widen any of the existing roads into Croyde.</p> <p>I would like to ask what happens to rubbish collection when there is a high proportion of tourists in the village. From observation in my close (3 second homes out of 5 houses) there is little knowledge of collection days and no precise idea of the very good recycling provision. Anecdotally, holidaymakers are not overly concerned "we're on holiday" and holiday home owners/ agents do not seem to pick up the slack. Notwithstanding the disrespect this shows to the village, it would also seem to imply that the black bins in particular are often contaminated with food - does this mean that most rubbish during peak holiday season by necessity goes to landfill/ incineration?</p> <p>The desire to nurture non-tourist business is long overdue. Our children need more choices and better prospects!!</p>
GNP10	Ali Green-Price	This is an excellent document! I am so grateful to all the people who have worked so hard to put this plan together and sincerely hope it is adopted to help preserve the character & beauty of this wonderful Parish. It is a document I will be referring to frequently- it has also opened my eyes to just how special this area is and the need to protect it for the future.

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GNP11	Highways England	<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 runs approximately 50km south of the plan area.</p> <p>We were previously consulted on the draft Plan by Georgeham Parish Council in March 2021. Following a review of the latest submission draft we remain satisfied that the proposed policies within the Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make. 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>
GNP12	Historic England	<p>Thank you for your Regulation 16 consultation on the Submitted version of the Georgeham Neighbourhood Plan.</p> <p>I can confirm that there are no issues associated with the Plan upon which we wish to comment.</p>
GNP13	Sport England	<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. 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</p>

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		<p>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. 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. 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</p>

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		<p>implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport</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>https://www.sportengland.org/how-we-can-help/facilities-and-planning/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>

Reference	Name of contributor	Comments
		<p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework</p> <p>PPG Health and wellbeing section: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p> <p><i>(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.)</i></p>
GNP14	North Devon AONB Partnership	<p>On behalf of the North Devon Coast AONB Partnership we have the following comments to make with regard to this document.</p> <p>Our organisation has frequently been consulted by representatives of Georgeham Parish Council during the evolution of the Plan. As a result we are pleased to see that the North Devon AONB is considered to be an integral part of the Plan and the document gives full consideration to AONB designation and landscape character.</p> <p>In our opinion, the Neighbourhood Plan will provide a very useful addition to the suit of document, that have been produced to help us conserve and enhance this valuable part of the AONB. The document provides useful advice as well as policy that will assist in both spatial planning and development control work. The Plan is very comprehensive and has taken on board the current policies of the AONB contained within our own AONB Management Plan. Sections on the landscape character, information on key views and vistas within the area as well as some Design Guidance for the built environment within Croyde and Georgeham will no doubt assist us all in considering future planning for an area that is currently under considerable development pressure.</p> <p>We therefore thoroughly comment this plan and its contents to you and due to our previous involvement have no additions or suggestions to make in terms of required alterations. The</p>

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		document should be considered an exemplar document and provide a good example for other Parish Councils to follow.
GNP15	Devon County Council	<p>Baseline Information The Devon County Historic Environment Record (HER) records that the plan area contains the following: Designated Heritage Assets: Grade I Listed Buildings: 1 Grade II* Listed Buildings: 1 Grade II Listed Buildings: 63 Conservation Areas: 3 Scheduled Monument 0 Registered Historic Park/Garden 0 Assets on the Heritage@RiskRegister 0</p> <p>Undesignated Heritage Assets: c.354</p> <p>Historic Environment Team General Advice The historic environment will be a material consideration in deciding many of the planning applications submitted in your area. The National Planning Policy Framework (NPPF, Section 12, 125 Achieving well-designed places), says that Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development. Also Section 16, 184-202 on Conserving and enhancing the historic environment indicates that plans should make the most of 'heritage assets' (archaeological sites, historic buildings, landscapes) by setting out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</p> <p>The production of your Neighbourhood Plan is an ideal opportunity for you to determine what parts of your Historic Environment are important to the community and how they are best</p>

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		<p>managed. You could think about how important these assets are to your community, to Devon or even nationally or internationally. Should the site or building be protected from development?</p> <p>Could it usefully be reused and incorporated into a development? Or is it not that important? What archaeological or historic areas and buildings could be used as community facilities or public open space? How can historic sites in the area be made more accessible to the community or linked together by existing or new public rights of way? How can historic sites, nature conservation and other local issues, such as highways and flood management, work together to make a better-quality environment all round?</p> <p>Neighbourhood Plan Overall</p> <p>Many of the planning policies are well covered. However, conserving and enhancing the historic environment has not been a consideration throughout the Neighbourhood Plan and our comments below reflect this. The images are good but we have no idea where they are located, so include captions. You could include in the caption for Image 1 for example that it shows off man-made development of the landscape (see Historic Landscape Characterisation mentioned below in 7.3).</p> <p>1. Introduction</p> <p>1.1.1 Georgeham Parish</p> <p>You could include a brief history of the parish here. It is the history and development that has shaped the parish we see today and given each settlement its special and distinctive character. Both Georgeham and Croyde are recorded in the 1086 Domesday Book as is Pickwell and are at least Saxon in origin. But there is evidence for much earlier activity in the parish with Mesolithic flint knapping sites recorded on the coast between Croyde and Baggy Point.</p>

Reference	Name of contributor	Comments
		<p>4. Housing</p> <p>4.3 Affordable Housing</p> <p>Parcels of land within the Georgeham Parish have been identified for possible future development. Depending on the individual archaeological potential some sites may require archaeological work either prior to or as a condition of planning application submission. See NPPF section 16, paragraph 199. It would be good to see a map of which sites have been included in the social housing allocation.</p> <p>5. The Built Environment</p> <p>Although the Neighbourhood Plan includes a section on the Built Environment, it omits mention of the historic environment. As mentioned above, the Neighbourhood Plan should be an opportunity to emphasise the parish's historic environment which includes its archaeological sites, features and landscape as well as its buildings (you refer to cultural heritage in 7.2.3 emphasising what North Devon has to offer). Please refer to the heritage assets attached.</p> <p>5.1 Built Environment Characteristics</p> <p>BE4 refers to listed buildings but there is no reference to them in the text. There are 65 listed buildings recorded on the NHLE. All are Grade II except the Church of St George which is Grade I and Myrtle Farmhouse which is Grade II*. The Listing also includes two limekilns and a WWII pillbox and bombing range target indicator and observation post. These listed buildings could be included on the maps of the Conservation Areas.</p> <p>As well as designated heritage assets (listed buildings) the parish also has a wide range of undesignated heritage assets (see HER data attached). These, although they may not meet criteria for national designation, do have a local heritage significance which merit consideration</p>

Reference	Name of contributor	Comments
		<p>in planning matters. The term 'heritage assets' is referred to in Appendix 11, so it would be good to include mention of it in the main text.</p> <p>5.3 Objectives for the Built Environment You could refer to NPPF Section 16, 185-188 here, on conserving and enhancing the historic environments, which indicates that plans should make the most of 'heritage assets' Label all the images in this section and other sections. Are they heritage assets? If not, then they could be added to the Historic Environment Heritage asset list.</p> <p>5.4 Policies for the Built Environment BE9: New recreational and sporting facilities Any new development should take into consideration Conserving and Enhancing the historic environment, see NPPF, section 16, paragraph 199 for designated and non-designated heritage assets.</p> <p>6.1 Landscape and environment characteristics 6.3.1 The Plan Aims d) Great you have considered to extend rights of way network but do also take into consideration access and enjoyment to all? Wheelchair and pram users for example. Lovely image of Pickwell Manor Farm. You could also include in the caption that it retains medieval fabric and is Grade II listed.</p> <p>7 Economic Development 7.3 Agriculture</p>

Reference	Name of contributor	Comments
		<p>This would be a good place perhaps to mention the Historic Landscape Characterisation (HLC) which gives more detail on the character of the landscape and how the pattern of farms, fields and hedgerows has developed since the medieval period. Further information on the HLC can be found at https://www.devon.gov.uk/historicenvironment/the-devon-historicenvironment-record/historic-landscape-characterisation/,</p>
GNP16	National Grid	<p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan</p>

Reference	Name of contributor	Comments
		<p>area. National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p>
GNP17	Andrew, Jane and Peter Cook	<p>Pickwell Barton already has a public footpath, with stunning views, that we maintain. There are substantial problems relating to the exciting footpath with dogs worrying livestock and gates being left open.</p> <p>Therefore, we are not in favour of a second Public footpath on Pickwell Barton. The proposed additional footpath would have the same problems as stated above and there would be serious health and safety issues due to cattle grazing in those fields.</p>
GNP18	North Devon Council	<p>The Council will ultimately have the responsibility to decide whether the Neighbourhood Plan is in general conformity with strategic policies and the other basic tests as set out in the National Planning Policy Framework and National Planning Policy Guidance. The District Council must also ensure that the Neighbourhood Plan is compliant with European Legislation. These decisions will be informed by the report of an Independent Examiner following examination. It is therefore necessary that we reserve our judgement until the examiner has produced his report.</p> <p>Nonetheless, without prejudice to the future decision making of the Council, the following observations and suggestions are made in response to the draft Neighbourhood Plan submitted to the Council and subject to Regulation 16 consultation. Where specific detailed</p>

Reference	Name of contributor	Comments
		<p>wording changes are proposed, text to be deleted is shown as struck through, whilst new text is underlined.</p> <p>The comments consider Basic Conditions for Neighbourhood Plans as specified by law:</p> <ul style="list-style-type: none"> • must be appropriate having regard to national policy • must contribute to the achievement of sustainable development • must be in general conformity with the strategic policies in the development plan for the local area • must be compatible with human rights requirements • must be compatible with EU obligations. <p>Some comments also provide some suggestions to aid with clarity and practical implementation of the neighbourhood plan.</p> <p>Refer to table 2 for specific comments</p>
GNP19	Devon Countryside Access Forum	<p>The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CRoW Act). Its statutory remit is to give independent advice “as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area...” Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice and this list includes parish councils. The DCAF currently has fifteen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.</p> <p>The Devon Countryside Access Forum has prepared a position statement on Neighbourhood Plans and this is attached.</p>

Reference	Name of contributor	Comments
		<p>The Forum welcomes the Neighbourhood Plan which contains useful and comprehensive information on public rights of way and green infrastructure. Policy SC3 – walking, cycling and riding - is strongly supported. The two maps on pages 97/98 showing public rights of way and aspirations for access improvements are useful. However, there is no reference to landowners, other than in terms of general encouragement to improve biodiversity and flood water management, so it is unclear whether landowners have been approached about these specific improvement schemes. Consulting with landowners at the earliest stage is critical.</p> <p>Point 12.6 refers to green infrastructure and biodiversity. Sub-section 12.6.1. b) states that ‘routes for walking and cycling’ are part of the multi-functions of green infrastructure. It would be useful for horse-riding to be included in that section.</p> <p>The Forum would welcome feedback on its comments</p>

Table 2: Comments by North Devon Council (reference GNP18)

Reference	Page	Para/Policy	Comment	Proposed Change
1		General	<p>NDC welcome the submission of the Georgeham Neighbourhood Plan. It is clear that a significant amount of work has been undertaken to reach this stage and the neighbourhood planning group are to be commended on their effort. The plan is well structured and very well presented.</p> <p>The representations submitted by North Devon Council are intended to be constructive, to improve clarity, to address any potential issues or inconsistencies in the plan and ensure that the plan is an effective tool to deliver the community's aspirations.</p>	~
2	8	3.7.1 / SC3	The identification of aspirational paths (page 98) is welcomed. However, it is not clear how application of the policies within the plan will help to deliver them.	<p>Suggest adding a sentence to 3.7.1 to read: "<u>Enhancement of the footpath network towards delivering the Aspirational Path Map will be delivered as opportunities arise.</u>"</p> <p>Add a sentence to SC3 to read: "<u>Opportunities to deliver new or enhanced rights of way identified on the Aspirational Path Map will be supported.</u>"</p>

Reference	Page	Para/Policy	Comment	Proposed Change
3	10/11	SC1 to SC4	Support the plan's objectives and approach to maintaining and enhancing existing community facilities.	~
4	14	H1	Support the plan's objectives and innovative approach to addressing the identified problems within the local housing market by introducing principal residence occupancy. However, as phrased, it only relates to housing within the development boundaries, although some housing would be permitted by the plan outside these boundaries. It also refers to 'land identified for development' which could be confusing as no specific sites are allocated for development in the neighbourhood plan, although sites are allocated in the adopted Local Plan. It may be simpler and clearer for readers for the occupancy to cover all new housing permitted by the neighbourhood plan.	Rephrase wording of first two sentences to read: " Land identified for the development of new housing within the villages' development boundaries <u>All new housing, excluding like-for-like replacement dwellings and affordable homes,</u> 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. "
5	18/19	BE1 to BE9	Support the plan's objectives and policies to protect and enhance the built environment, especially the careful identification and description of the different character areas within Croyde and Georgeham.	~

Reference	Page	Para/Policy	Comment	Proposed Change
6	101		It would be helpful if the map showing Georgeham conservation area and character areas used the blue lines to define the boundaries of each character area, as for Croyde (page 100). It should be fairly obvious but it would help to clarify boundaries and avoid opportunities for future disagreement.	Amend map showing Georgeham character areas (See attached map).
7	19	BE9	May need to define in the supporting text what is meant by an existing complex	Clarify definition of existing complex
8	22	NE1	The key views map mentioned in criterion c) is on page 96 not page 92	Correction

Reference	Page	Para/Policy	Comment	Proposed Change
9	23	NE3	<p>For clarity the policy should be renamed Local Green Spaces to ensure consistency with the NPPF.</p> <p>For clarity, policy NE3 should set out the criteria of what or when development will be supported in order to be consistent with the managing development in the green belt. It is unclear for applicants, the community and decision makers which development would be potentially acceptable.</p>	<p>Suggest renaming the policy as 'NE3: <u>Local Green Spaces</u> within settlements'</p> <p>Update the policy to be clear what will/will not be permitted as guidance for applicants and the community.</p> <p>Suggest wording could read: <u>"Proposals for new or extended buildings and structure within local green spaces will not be supported unless they are required for agriculture, or facilitate the protection and enhancement of the local biodiversity and recreational value of these spaces."</u></p>

Reference	Page	Para/Policy	Comment	Proposed Change
10	23	NE4	The term “highest aspirational standards” is too imprecise and unclear to be included in the policy. It is considered that it is an objective for the Plan and as such should be moved to the supporting text.	<p>Suggest deleting criterion a) from policy NE3 to read: “New development, including rebuilds and extensions in the parish should demonstrate:</p> <p>a) How the highest standards of energy efficiency guidelines applicable at the time have been pursued: and b) How opportunities have been identified ...”</p> <p>Add an additional criterion to the Plan’s objectives in paragraph 6.3.1:</p> <p><u>“h) Pursue the highest aspirational standards of energy efficient guidelines applicable at the time of submitting the planning application”</u></p> <p>Change the title of the policy to: NE4: <u>Energy Efficiency Small Scale Renewable Energy</u></p>

Reference	Page	Para/Policy	Comment	Proposed Change
10	23	Photo	The caption below the heat pump photo reads like a policy requirement or instruction, especially within the blue policies box. Whilst the photo is applicable, it is suggested that ' <i>should utilise</i> ' is rephrased.	Suggest amending caption to: " <u>New development should utilise renewable energy solutions such as heat pumps are one potential small-scale renewable energy solution.</u> "
11	27	7.6	Support the plan's objectives to strengthen the local economy whilst protecting the local environment.	~
12	28	ED2	This policy is broadly supported, including criterion (b)'s requirement for any significant demand for travel to be met by sustainable travel modes. However significant demand for travel is imprecise and needs to be clarified or defined in the supporting text. Whilst this aspiration is welcomed, it is perhaps overly restrictive in a predominantly rural area if it requires all travel demand to be served walking, cycling and public transport.	Suggest amending criterion (b) to read: "Where the proposals will generate a significant demand for travel, <u>they the majority of this demand</u> can be served by public transport, walking and cycling" . Add a sentence after 7.3.4 to define the threshold or criteria to be used for assessment of what constitutes a significant demand for travel.
13	28	ED4	This policy is broadly supported, but criterion (c) needs to clarify whether 'temporary or permanent' refers to the duration of facilities being provided (as is assumed), or whether it refers to the duration for which more permanent facilities are blending into the landscape (e.g. when deciduous trees provide screening in summer).	Amend criterion (c) to read: " whether it is <u>a</u> temporary or permanent <u>facility</u> , and avoid ...".

