

Table 1: PAS Toolkit – Policy areas not in conformity with national planning policy – how they could be addressed.

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|-------------------------|--|---|--------------------------|---------------------|---------------------------------|
| Traveller Accommodation | <p>The Local Plan identifies a requirement for permeant Traveller pitches and transit sites, based on a 2014 assessment of need. The identification of sites to meet the evidenced need was to be addressed by a Traveller Site Allocations DPD, as set out in the 2016 Local Development Scheme (LDS).</p> <p>The DPD has not been delivered and it is not subject to a delivery programme within the current Local Development Scheme (2022). The intention is that this matter will be addressed as part of a comprehensive update of the Local Plan.</p> | This work could be undertaken as part of either a partial review, through a separate DPD or a new local plan. | | Y ¹ | Y |
| Design Codes | <p>The need for the preparation of design guides and codes post-dates the adoption of the Local Plan, on which basis there is no provision or reference to such in included in the Local Plan.</p> <p>Note Design Codes are illustrated design requirements that provide specific, detailed</p> | Design Codes can be incorporated into a DPD, or provided outside the scope of a DPD, such as in the form of a Supplementary Planning Document | Y | Y | Y |

¹ Note this matter may be only partial met by a Partial Review.

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|-------------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | parameters for the physical development of a site or area. | | | | |
| First homes | The introduction of First Homes as a form of affordable housing post-dates the adoption of the Local Plan, on which basis there is no provision for such in the Local Plan. | <p>It may be possible to introduce First Homes as a form of affordable housing. However, without considering local options it is unclear as to whether this product would address local needs. Potentially there is scope to consider this through a partial review.</p> <p>If however, viability issues are required to be considered, this would bring this matter in to the scope of strategic policy, which could only be addressed through a new Local Plan.</p> | ? | ? | Y |
| 10% Affordable home ownership | <p>The 10% affordable home ownership provision (on major development sites) post-dates the adoption of the Local Plan, on which basis there is no provision for such in the Local Plan.</p> <p>The matter was considered on introduction, as set out in the Councils Affordable Housing SPD. The Councils position, as enabled by national policy does not impose this provision</p> | No change is considered necessary to planning policy in light of the application of paragraph 65 of the NPPF. | N/A | N/A | N/A |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|--|---|--|--------------------------|---------------------|---------------------------------|
| | as such would be prejudicial to addressing identified affordable housing needs across northern Devon. | | | | |
| Town centres | Increased flexibility is required to town centre policies to reflect the consequences of changes to the Use Class Order, introduced following the adoption of the Local Plan. | Development management policies do not reflect recently introduced changes to the Use Class Order. Non-strategic revisions focused on town centre activity could be achieved through a partial review; more strategic changes relating to town centre boundaries, spatial strategies and allocations would require a wider update to the Local Plan. | | Y ² | Y |
| Identification of a Coastal Change Management Area | The Local Plan seeks to manage coastal change, incorporating provisions that require development to avoid risk from current and future coastal erosion, along with planning to defend coastal settlements and resorts from marine inundation and tidal flooding (Policies ST03, ST09 & DM02: Environmental Protection). | Defining the extent and developing policy relating to a CCMA could be undertaken as part of either a partial review or a new local plan. A partial review would need to be careful not to impact on Local Plan place-based strategies. | | Y | Y |

² Note this matter may be only partial met by a Partial Review.

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|--|---|--|--------------------------|---------------------|---------------------------------|
| | The Local Plan does not incorporate Coastal Change Management Areas (CCMA), although work is underway to define its area. | | | | |
| Potential non-demonstration of a five-year housing land supply | <p>The Councils have not demonstrated a five-year supply of deliverable sites following an appeal decision in April 2020.</p> <p>Work is progressing, in accordance with an established methodology to update the Councils five-year housing land supply position. This work is programmed for completion in February/March 2023.</p> | <p>If a five year land supply cannot be demonstrated the scope for securing this position would be limited through a partial review to the allocation of small sites which do not change the spatial strategies of settlements.</p> <p>More fundamental changes relating to the housing requirement and the location and scale of allocations would need to be undertaken as part of a new Local Plan.</p> | | Y | Y |
| Potential demonstration of a five-year housing land supply | Re-establishment of a five-year housing land supply | If a five-year housing land supply is re-established it would negate the need to undertake a review of the Local Plan on this matter. | Y | | |

Additional Policy issues raised by elected Members through survey work and visioning Workshops – November/December 2022

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|--------------------------|---|---|--------------------------|---------------------|---------------------------------|
| Infrastructure provision | Policies are not strong enough to insist on the provision of infrastructure on/near new sites e.g. for hospitals, dentists and schools. | <p>Local Plan policies are robust (reference A7 PAS Toolkit 1). Any variation from Local Plan targets/ thresholds require robust justification, generally on the basis of viability considerations. This is a matter of implementation through Development Management.</p> <p>Local planning authorities consult with infrastructure providers, including the NHS and Devon County Council (education/ highways), when preparing a local plan and in response to specific development proposals. Of note the scope and timing of enabled infrastructure is directed by generated needs; it is not possible to secure infrastructure beyond the scope of generated need.</p> | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------------------|--|--|--------------------------|---------------------|---------------------------------|
| | | Of note the NHS locally have established a mechanism to quantify needs generated by development proposals and have recently implemented a robust approach to seeking s106 contributions for acute care provision. | | | |
| Infrastructure provision - general | Infrastructure provision is included as part of planning permissions and deemed not necessary at a later date. | This is a matter of implementation through Development Management, development generated needs are sought in respect of Green Infrastructure through DM10 supported by Policy ST23. | Y | | |
| Infrastructure provision - general | Infrastructure is not being delivered prior to development. It should already be in place for new developments | In general infrastructure is met in step with development. It is not usually possible to 'front load' infrastructure provision until schemes have met specified thresholds due to the costs involved to the developer. | Y | | |
| Infrastructure provision - general | Developments owned by multiple people or delivered by different developers is often poor. No joined | The Local Plan seeks contributions proportionally from the individual | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|---------------------------------|--|--|--------------------------|---------------------|---------------------------------|
| | up thinking amongst developers doesn't deliver a quality place with the necessary infrastructure. | developers on sites in multiple ownership. This is a matter of implementation through Development Management. | | | |
| Green Infrastructure/Open space | Green space contributions should be meaningful spaces such as sports pitches or large open community spaces. as they are often tiny patches spread around outside new houses/developments. | Policy DM10 enables open spaces to be of a 'meaningful' size and provide for the provision of sports facilities. This is a matter of implementation (potentially including a supplementary planning document to provide further clarity if this is considered necessary). | Y | | |
| Green Infrastructure/Open space | S106 contributions for open space are not being provided, causing an imbalance of amenities. | Issues relating to the delivery of the infrastructure can be addressed without changing planning policy. Policy DM10 enables open spaces to be of a 'meaningful' size and provide for the provision of sports facilities. This is a matter of implementation (potentially including a supplementary | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|---------------------------------|---|--|--------------------------|---------------------|---------------------------------|
| | | planning document to provide further clarity if this is considered necessary). | | | |
| Green Infrastructure/Open space | Need to consider management of facilities such as play areas. If they are provided sometimes the management is taken over then not managed properly. | <p>Issues relating to the management of facilities can be addressed without changing planning policy.</p> <p>This is a matter of implementation by the Councils.</p> | Y | | |
| Transport | Improve transport links into northern Devon such as regular shuttle to Tiverton Parkway, upgrades to Barnstaple rail link and ferries to Wales | The Local Transport Plan should address these strategic matters, with a new Local Plan reflecting the LTP. | Y | | Y |
| Transport/Accessibility | Need to look at wider connectivity with roads/transport/safe footpaths and cycle paths and move away from cars being an integral part of design and layout examples raised: | <p>Policy ST10 provides the hooks to address many of the issues raised, with DM05 providing further detail.</p> <p>However, if matters extend to the strategic level, such as the connectivity between settlements this will need to</p> | Y | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|-------------------------|---|---|--------------------------|---------------------|---------------------------------|
| | | be addressed through a wider review. | | | |
| Transport/Accessibility | The road structure and infrastructure are not suitable for large vehicles used by rural businesses. Therefore, there is a need to improve connectivity between rural areas and the link road. | <p>The Local Transport Plan should play a role in addressing this issue.</p> <p>There are, however, challenges in doing so and if the wish is to enhance connectivity between settlements and to address matters relating to reducing traffic flows, this will need to be undertaken as part of a new Local Plan.</p> | Y | | Y |
| Transport | There is too much traffic in general but especially between Bideford and Barnstaple. | <p>When the spatial strategy is reviewed for a new local plan, this matter will be assessed. This cannot be undertaken through a partial review. Other measures outside of the Local Plan can also be sort to reduce traffic and influence people's habits.</p> | Y | | Y |
| Transport | Highways officers need to ensure there is robust evidence when requesting infrastructure provision. | This is an implementation issue to be addressed through the Development Management. | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|-----------------------------|---|---|--------------------------|---------------------|---------------------------------|
| Transport and Accessibility | Include the Local Cycling and Walking Infrastructure Plan (LCWIP) within the Local Plan | The Councils are working with DCC in preparing a LCWIP, which will enable improved active connectivity within Barnstaple and Bideford. It is acknowledged that this work is needed elsewhere within the plan area, and this does not require updated policies to do so, | Y | | |
| Transport and Accessibility | Cycling is not easy with few connected routes other than the Tarka Trail. Some places are not connected at all. | Policy ST10 provides the hooks to enable further projects to come forward in addition to the LCWIP project, such work could be through schemes outside of the Local Plan or as a partial review of Development Management policies. Alternatively, if the outcomes change settlement strategies this should be undertaken through a new Local Plan. | Y | Y | Y |
| Transport and Accessibility | There is a need for cycle storage and electric vehicle charging should be included on new developments | Cycle storage and electric charging points are included as a policy requirement. | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|--------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | | This is a matter of implementation through Development Management. | | | |
| Car parking | Car parking provision is not sufficient resulting in parking on pavements and neighbour dispute. | This matter is addressed in Policy DM06. This is a matter of implementation through Development Management. | Y | | |
| Design and Accessibility | There needs to be more public access into new developments as they are often inward facing | Policies ST04 and DM04 provide the opportunity for schemes to address concerns raised in relation to access/accessibility. The implementation of design codes could also address this issue as well as the NPPF and the National Design Guidance. | Y | | |
| Design Quality | The lack of a five year land supply is allowing poor development to be pushed through. Need a better quality overall with no compromise. | The NPPF and associated planning policy guidance is clear that poor quality development is not acceptable. Therefore, the concerns raised should be able to be addressed through further training for Officers and Members. | Y | | |
| Housing Requirement | The government are demanding too many new homes and some | The government is committed to boosting the supply of | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|---|---|--------------------------|---------------------|---------------------------------|
| | <p>communities feel they are losing their identity and sense of community.</p> | <p>housing. Based on evidence of need and growth ambitions the Local Plan requirement is set at an annual requirement of 861 dwellings 2011-2031.</p> <p>Following the establishment of the annualised requirement the government introduced a standard methodology, which currently sets out a requirement for northern Devon Circa 760 new homes per annum. This figure will be the starting point for a revised requirement established in a new Local Plan.</p> <p>The consequences of the absence of a five year housing land supply are in some instances resulting in development not enabled by the Local Plan.</p> | | | |
| Five Year Land Supply | <p>There is a lack of power to stop development between Bideford and Barnstaple. The Council's planning</p> | <p>The lack of a five-year housing land supply does impact on decision making as the 'titled balance' needs to</p> | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | <p>decisions for housing are allowed on appeal.</p> | <p>be applied, which has, for some proposals resulted in non-plan led sites being permitted, If the five-year housing land supply is secured, a plan led approach in respect of the enabled housing can be re-established.</p> <p>Any adjustment to the spatial or distribution strategy would need to be considered as part of a new local plan.</p> | | | |
| Five Year Land Supply | <p>Concern that the Councils are unable able to demonstrate a five-year land supply now and potentially in future years.</p> | <p>Work is ongoing to understand and update the five-year housing land supply position for the plan area.</p> <p>Undertaking a comprehensive review of the Local Plan would enable a review of the housing requirement and the five-year land supply position.</p> | Y | | Potentially |
| Viability | <p>A need to recognise how important proportional development is and address viability from the start.</p> | <p>The Local Plan is supported by a strategic level viability assessment, which provides</p> | Y | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | | <p>the basis for thresholds and targets set in the Local Plan.</p> <p>Viability is considered as required during the decision making process; the Councils' will always use best practice in doing so.</p> <p>If the comment is in relation to the allocation of sites in the Local Plan, this will be a consideration when sites are assessed as part of a new local plan.</p> | | | |
| Affordable Housing | The Local Plan is weak on affordable housing. Landowners should be able to demonstrate 30% affordable housing before sites are added to the plan | <p>It is recognised that there is a significant need for affordable housing which is not currently being met within the plan area.</p> <p>However, within the context of planning policy, the PAS Toolkit (Part 1 question A5) demonstrates that affordable housing is being delivered on qualifying sites and provides an explanation as to why this is reasonable.</p> | | | ? |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|--|--------------------------|---------------------|---------------------------------|
| | | The NPPF allows for viability matters to be considered in the decision-making process to enable development to come forward. It is not always possible to deliver 30% of housing on qualifying sites. If the Councils' were to prepare a new local plan, it is not anticipated that higher affordable housing thresholds could be sought, although this will be established through a new strategic viability assessment.. | | | |
| Affordable Housing | Social housing needs to be built to help tackle the housing crisis. This should be good quality, meeting the needs of the local community and not packed into sites. | The Local Plan prioritises the delivery of social rented affordable housing. The requirements for the size, type and density of affordable housing are set out in an Affordable Housing SPD which was adopted in 2022; it provided additional detail on such matters. | Y | | |
| Affordable Housing | Affordable housing is often included in outline applications then viability means there is less or none in the final plan | Legislation does allow local planning authorities the ability to reject requests to | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | | <p>reconsider S106 agreements within five years.</p> <p>Viability is a material consideration in the determination of planning applications, the Councils approach to which is framed by national planning policy and guidance.</p> | | | |
| Affordable Housing | The lack of social housing is possibly due to a lack of land being available for bigger sites. Having more sites available could mitigate speculative and non-plan led applications. | The Local Plan was developed in part based on having large sites to enable the delivery of affordable housing and secure strategic infrastructure. | | | Y |
| Affordable Housing | Proper social housing needs to be built to help tackle the housing crisis. This should be good quality and not packed into sites | The Local Plan has robust policies to seek affordable housing whilst having regard to the viability of housing development. The Affordable Housing SPD provides details of what is expected with regards to quality and density. | Y | | |
| Types of Housing | New developments should be affordable, to support local need | Policy ST17 sets out the scale and mix of housing, | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | e.g., family sized housing and bungalows. | and states that development proposals should reflect identified local housing needs. | | | |
| Types of Housing | New houses are being built but with no thought for who may actually live in them. Not sustainable development which meets local need | <p>Open market housing is supported within the settlements defined in policies ST06 and ST07, with ST17 addressing housing mix. To change this approach would require a change to the strategic policies of the Local Plan.</p> <p>The Local Plan is based on evidence of housing need in respect of tenure and property size, Planning applications are determined having regard to this evidence.</p> | | | Y |
| Types of Housing | Wish to increase key worker housing | The Local Plan does not prevent key housing coming forward. A detailed policy could be considered through a partial update. | | Y | Y |
| House Sizes | Homes are too small inside and are not useful spaces for modern living. | The Local Plan does not have a policy on minimum space standards. Officers do | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | | however, endeavour to secure the national technical standards wherever possible. A new Local Plan would likely be required to address this matter rather than a partial review due to potential viability implications. | | | |
| Quality of Housing | The overall quality of the current houses being developed is poor and the Councils will be picking up the pieces in the future. | <p>The quality of housing is managed through building regulations rather than planning policies.</p> <p>The policies of the Local Plan and national planning policy seek the delivery of high design standards.</p> | Y | | |
| Energy Efficiency/renewable energy | New houses should be more energy efficient as it is not sustainable to build houses which are expensive to heat e.g. solar panels and insulation | This matter is addressed through building regulations. To do more than this would require a new local plan as such changes would have an impact on viability. | | | Y |
| Sustainable construction | Sustainable materials should be used more, can we support the sourcing of better materials | This matter is addressed through building regulations. To do more than this would require a new local plan as | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|-------------------------------------|---|---|--------------------------|---------------------|---------------------------------|
| | | such changes would have an impact on viability | | | |
| Listed buildings/Conservation areas | Allowing conservation double glazing should be reconsidered for listed buildings as it is not usually allowed in Torridge | It is not an issue which the Local Plan prevents. It is a matter that development management should address. | Y | | |
| Listed buildings/Conservation areas | Suggest unlisting empty buildings as too expensive to fix up. | The Local Plan is not a barrier to this taking place. It will be a matter for individual Councils to consider in discussion with relevant stakeholders | Y | | |
| Spatial Strategy | Support for new settlements if it means building stops in areas with too much development already | This is a fundamental change to the approach taken in the Local Plan and therefore a new local plan would be necessary. | | | Y |
| Spatial Strategy | It makes sense to continue developing urban areas as the infrastructure will be in place. There has been growth here already and urban areas are working reasonably well. | This is already the approach adopted in the Local Plan. Any shift in proportional development between rural and urban areas would be a matter for a new local plan. | | | Y |
| Town Centres | Need for robust policies to create different town centres and support for businesses adapting to new circumstances e.g. have become social and leisure hubs. | If looking at the changing role of town centres in response to the issues raised, it would be pertinent to review the | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|---|--|--------------------------|---------------------|---------------------------------|
| | | defined town centre boundaries/ allocations/ opportunities which would require a wider review of the Local Plan, based on updated evidence. | | | |
| Town Centres | Question the need for primary and secondary frontages within town centres | It would be possible to remove these through a partial update (if it is concluded this is necessary), however it may be more appropriate to do so through a new local plan, alongside a review of town centre boundaries to ensure the consequences are considered holistically. | | Y | Y |
| Town Centres | People living in re-used spaces above flats could bring more people into town centres using the shops there rather than out of town retail. | The Local Plan already allows this to take place. | Y | | |
| Town Centres | More events should be supported to bring people into towns, this could be during the day or at night. | The Local Plan, in combination with Permitted Development rights allows for flexible changes to be made. A new local plan would be required to consider strategies and plans for individual settlements. | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|---------------------------|--|--|--------------------------|---------------------|---------------------------------|
| Town Centres | Pedestrianising all or part of town centres should be considered to keep traffic out of town centres and create a nice environment. | The Local Plan would not prevent this from taking place. It could be considered as part of a new plan for developing strategies for places. | Y | | Y |
| Town Centres | Budget hotels could be moved closer to town centres rather than situated on the edges of towns. | The Local Plan would not prevent this from taking place. It could be considered as part of a new plan for developing strategies for places. | Y | | Y |
| Hierarchy of Town Centres | Smaller areas are losing business as people go to Barnstaple, this also increases traffic and creates disparity between Bideford and Barnstaple. | <p>Barnstaple is the sub-regional centre for the plan area; it is expected that it would attract visitors from across the plan area. However, this should not be detrimental to lower order settlements. Revisiting the Local Plan approach would need to be considered through a new local plan.</p> <p>In the short term there maybe mechanisms outside of the planning system available to attract more visitors to the</p> | Y | Y | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|---|--|--------------------------|---------------------|---------------------------------|
| | | range of town centres in northern Devon. | | | |
| Spatial Strategy | We do have enough in the plan with boundaries allowing us to distinguish between urban and rural? | <p>The Local Plan provides a distinction in respect of the location of planned development, stated by location and settlement type, and in the rural area.</p> <p>The Local Plan establishes how needs (significantly housing and employment) will be addressed.</p> | NA | NA | NA |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|---|--|--------------------------|---------------------|---------------------------------|
| Spatial Strategy | Why does Barnstaple need to be a strategic centre? This takes away from Bideford/ other smaller towns as people travel to Barnstaple. | Barnstaple's status as a strategic centre is based on a wide ranging assessment of services/facilities/employment opportunities etc. The Local Plan identifies for Bideford to play a complimentary role to Barnstaple, significant growth is planned in both locations. To change this approach would require a revised spatial strategy as part of a new local plan. | | | Y |
| Spatial Strategy | Young people are leaving the area due to house prices and a lack of opportunities. They cannot afford to live where they grew up. Retirees and those looking for second homes are the only ones who can afford houses in northern Devon | The Local Plan seeks to meet needs including through the provision of affordable housing. | Y | | |
| Tourism | The plan is very weak when it comes to policies around tourism. | It is not clear from the comments what changes are | Y | Y | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | <p>Tourism policies are not delivering and are too constrained. They could and should go further.</p> <p>It is not always clear what the policy is on rural tourism.</p> | <p>sort to the tourism policies of the Local Plan, which provide a flexible approach, based on the spatial strategy for the plan area (policies ST13, DM17 and DM18). Clarification on the scope of change will determine whether a revised position could be undertaken as part of a partial review (through changing development management policies) or a new local plan (if the spatial strategy needs to be amended).</p> <p>Outside of the Local Plan, the Northern Devon Tourism Strategy 2018 – 2022 provides details as to how the area will be promoted and ways to secure the best tourism outcomes for the area</p> | | | |
| Tourism | Should be more scope for quality tourism. Need to recognise | The Local Plan provides for these matters to take place. | Y | Y | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|---|--------------------------|---------------------|---------------------------------|
| | increased demand for glamping and other high-quality accommodation | If the wish is to go further than DM17 then this can be explored through a partial update. | | | |
| Tourism | Need more facilities for tourists alongside holiday accommodation as we are at capacity in terms of restaurants etc. | The Local Plan provides for new and the expansion of tourism facilities and accommodation in appropriate locations, which are wide ranging. | Y | | |
| Tourism | Need to address the number of second homes and Air BnBs | This is not a matter than can be easily addressed through a development plan. Subject to justification a principal residency policy could potentially be introduced through a partial review (and also through neighbourhood plans). | | Y | Y |
| Tourism | Re-visit the 'Golden Bay' promotional campaign and improve the quality of hotels/other places people may stay. | This is not within the scope of a Local Plan. The Local Plan through Policy ST13, seeks the delivery of high quality tourism development. | Y | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|--------------------------|---|---|--------------------------|---------------------|---------------------------------|
| Rural Strategy | There needs to be plan led development for rural villages otherwise you get too much unplanned growth | The Local Plan is clear in what can be enabled in different locations. Unplanned development is a symptom of not being able to demonstrate a five-year land supply. | | | Y |
| Rural Strategy - Housing | There is a lack of housing in rural areas, but the majority should continue in larger areas, should be a true mix with associated infrastructure | The Local Plan provides for housing, in relation to the settlement hierarchy having regard to evidenced needs and community aspirations. The Local Plan provides for housing in the rural areas including the provision of exception sites and other provisions to meet housing needs. Any significant change to this approach would need to be considered through a new local plan. | | | Y |
| Rural Strategy - Housing | The Rural strategy is not working, and rural settlements do need more houses. Villages need a small amount of development to ensure their viability and contribute to meeting housing targets | A variety of comments have been raised in relation to this matter with some wishing for more development in the rural areas and others wishing for the policies to remain as they are. | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--------------|--|--------------------------|---------------------|---------------------------------|
| | | <p>Local Centres and Villages, generally contain allocations to enable growth and the accommodation of affordable housing.</p> <p>The absence of a 5 year housing land supply has impacted on the implementation of the relevant policies, with developments permitted on sites which would otherwise be refused, across defined settlements, in Rural Settlements and in the wider Countryside.</p> <p>The Local Plan does have a flexible policy for the provision of housing in Rural Settlements.</p> <p>If the wish is to change opportunities for development, it is anticipated that such change is likely to require a change to the</p> | | | |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|--------------------------|--|--|--------------------------|---------------------|---------------------------------|
| | | spatial strategy and therefore the need for a new local plan. | | | |
| Rural Strategy - Housing | Open countryside' policy makes it difficult to develop small sites in rural areas. New developments are necessary to enable young people to stay in the area and be able to afford houses. | The Local Plan enables new rural accommodation in sustainable locations, including through exception sites focused on affordable housing and local needs in Rural Settlements. Any variation in the distribution strategy would need to be considered through a new Local Plan. | | | Y |
| Rural Strategy - Housing | Half of Torridge population is outside of main centres and development should be allowed here as rural settlements need more houses | As above | | | Y |
| Rural Strategy - Housing | Change the Rural Settlements policy as it currently requires a level of facilities and services. Residents will likely have cars as they need them to get around. | This would need to be undertaken as part of a new local plan as it would impact on the spatial strategy. | | | Y |
| Rural Strategy - Economy | Need to provide more employment land in rural areas, both within settlements and in the Countryside | The Local Plan provides wide ranging opportunities for the expansion of and new rural enterprises. | Y | Y | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|---|--|--------------------------|---------------------|---------------------------------|
| | | It is not currently clear as to the scope of sought changes; the extent of which will determine if they could be achieved through a partial review, or be contained within a new local plan. | | | |
| Rural Economy | Not much in the current Local Plan around the re-use of buildings in the countryside. Could be used to support tourism rather than building new structures. | This is a matter of implementation Policy DM14, DM15 and DM27 relates to the re-use of disused and redundant rural buildings. | Y | | |
| Rural Tourism | Promotion of green tourism is important. There is a fine balance between facilitating tourism development and landscape impact. | The Local Plan supports high quality tourism, which would include green tourism; it also protects environmental assets. | Y | Y | Y |
| Agriculture | There could be more support for agriculture in the Local Plan, including being more support for applications from such businesses. | A significant amount of agricultural activity is implemented through permitted development rather than local plan policies. Therefore further work is needed to establish the detailed policy matters which could be addressed, or | ? | ? | ? |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|---|---|--------------------------|---------------------|---------------------------------|
| | | whether these matters can be dealt with outside of the planning system. | | | |
| Neighbourhood Plans | Neighbourhood plans could support rural proportional development, but some places lack expertise/money/drive needed to develop a neighbourhood plan | <p>Neighbourhood Plan do present an opportunity for parishes to prepare non-strategic planning policies, however it is recognised that it is not a simple task to do so.</p> <p>The Councils could look to provide more support to town/parish councils, or alternatively work closely with the parishes to incorporate their aspirations into a partial review or new local plan (depending on what the issues are).</p> | Y | | |
| Natural Environment | Greater protection required for non-designated biodiversity sites. | <p>Policy DM08 provides the sought protection.</p> <p>Specific concerns would need to be considered further in order to identify whether this issue should be explored further,</p> | ? | ? | ? |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--|--|--------------------------|---------------------|---------------------------------|
| Natural Environment | The plan must be specific about what is meant by sustainability/renewables, this is now of greater importance than when the plan was written. | There is scope for considering sustainability and renewables further. The extent of which would be relative to whether it was for a partial or comprehensive new local plan, | | Y | Y |
| Natural Environment | <p>Need better protection of our natural environment especially rivers, hedgerows, and wildlife. Rivers are at capacity and there is increased flooding due to climate change with reservoirs suffering despite the rain.</p> <p>New developments should include soakaway systems and rainwater harvesting. We need more trees, passive cooling solutions, more soft landscaping, and protection for existing biodiversity assets.</p> <p>More innovative approach is necessary to delivering sustainable drainage that benefits biodiversity net gain/flood prevention e.g. Green roofs, ponds, reed bed systems.</p> | The Local Plan already provides strong provisions to address these matters. This is an implementation issue to be consider | Y | | |
| Natural Environment | DEFRA policies are often changing regarding re-wilding and planting more trees. Should follow these | The Local Plan would not prevent this taking place. A new Local Plan would take | Y | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|---------------------------------|---|---|--------------------------|---------------------|---------------------------------|
| | policies to help protect our unique landscape. | into account both national and local strategies in relation to this matter. | | | |
| Renewable Energy – Onshore Wind | Promote community based onshore wind projects including the necessary infrastructure for storage. Small scale not large commercial scale or we need to look at a proper wind farm instead of lots of individual turbines scattered around because without turbines we just get solar farms which cover more land and produce less energy. | A policy on wind energy could be undertaken as part of a partial review, subject to the avoidance of prejudice to Policy ST16. | | Y | Y |
| Renewable Energy – Solar | The Plan needs to differentiate between small scale Photo-Voltaic (PV) and large-scale PV. Some are too big for the area despite the plan not supporting large scale PV developments | This matter is already covered by the Local Plan and supporting evidence, however further work could be undertaken as part of a partial review, to consider matters such as a revised landscape character sensitivity Assessment. | | Y | |
| | Climate change is a main concern as is biodiversity and offsetting and how this is implemented | Climate change/ the delivery of biodiversity on and off site are addressed in the Local Plan, however they could be strengthened in a new plan to | | | Y |

| Topic/NDTLP Policy Ref | Issue Raised | Solution(s) | Outside of a plan update | Partial plan update | Comprehensive update / new plan |
|------------------------|--------------|---|--------------------------|---------------------|---------------------------------|
| | | <p>ensure the matter is considered holistically.</p> <p>It should be noted that some concerns may be addressed through the implementation of the Environment Act.</p> | | | |

