

Working together



South Hams District Council

Response to the

Ringmore Neighbourhood Plan Regulation 16 consultation

August 2021

The Ringmore Neighbourhood Plan (Reg 15 Submitted Copy) was submitted to South Hams District Council on 24th May 2021. The Council was satisfied that the submission draft and accompanying documents complied with all the relevant statutory requirements

The plan was publicised in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations and representations invited between 14th June 2021 and 26th July 2021. South Hams District Council made a full response to the Regulation 14 consultation carried out by the Qualifying Body in respect of the Ringmore Neighbourhood Plan.

This document sets out South Hams District Council's response to the Regulation 15 version of the plan, focussing on the extent to which it is considered that the current version of the draft plan has responded to comments made at Regulation 14.

Overall, the Council is satisfied that the Regulation 15 draft neighbourhood plan has largely taken adequate account of comments made at Regulation 14, and that the consequent rewording of the document has resulted in a stronger plan. There remain, however, areas of concern that are detailed below.

Comments on the General Text

Policy/Text	Comments
<p>Policy RNP1 - Development within the Settlement Area</p> <p>New development will be supported within the Settlement Boundary, where justification of local need is proven, and proposals are in line with: -</p> <ol style="list-style-type: none"> 1. The development is contained within the Settlement Boundary shown in Figure 10 and the priority requirement for development will be for affordable local housing needs and the need for such development is clearly demonstrated. 2. The development meets the requirements of other relevant policies of the NP. 	<p>No comment.</p>
<p>Policy RNP2 - General Design Principles for New Development</p> <p>New housing development will only be supported where it can be demonstrated that: -</p> <ol style="list-style-type: none"> 1. The design is of good quality and sympathetic with the character of the surrounding built and non-built environment. 2. The character of the parish is not negatively affected for example current "Dark Skies" status is not affected. 3. Listed buildings and heritage assets are not adversely affected. 4. "Off Road" only parking is provided in line with the standards required by South Hams District Council. 5. New roof heights are not to be higher than existing attached buildings and no higher than the general height of 	<p>No Comment</p>

<p>buildings in the local area. The development should not impinge upon the outlook or obstruct protected public views as demonstrated in the Proposal Maps 2 and 3 on pages 42/43 and in Section 15 Proposal Maps.</p> <p>6. Any new development satisfies the latest septic tank regulations (Jan 1st, 2020) and/ or complies to the existing South West Water Notice of Modification of Consent to Discharge ref NRA-SW-5244 & NRA-SW-5245.</p> <p>7. The development meets the requirements of all other relevant policies of the Plan.</p>	
<p>Policy RNP3 - Development on “Rural Exceptional Sites” through CLT or other Private Self Build initiatives</p> <p>Proposals for small scale community led schemes or private self-build developments will be supported on rural exception sites (defined as land adjoining or very near to an existing settlement, which would not otherwise be released for residential purposes) where the developments can achieve affordable housing to meet proven local needs subject to the following: -</p> <ol style="list-style-type: none"> 1. The design meets the requirements in Policy RPN 2. 2. It meets a proven need for affordable housing for local people as defined in the NPPF and the JLP SPD 2020 (paras 11.65 and 11.66) and management of any such scheme will ensure that the dwellings continue to be occupied by local people in perpetuity. 	<p>The development of rural exception sites should not be limited to CLT or Private Self Build initiatives. General development proposals should also be included.</p>
<p>Policy RNP4 – Principal Residence Housing and Holiday Lets</p>	<p>No comment.</p>

<p>Any proposals for new housing development within the settlement boundary, will be supported if the proposal satisfies the following criteria: -</p> <ol style="list-style-type: none"> 1. It is only to meet identifiable local housing need and first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a Principal Residence. 2. The restriction will be secured prior to the grant of planning permission through appropriate Planning Obligations created and enforceable under section 106 of the Town and Country Planning act 1990, or subsequent legislation. 3. The development is in keeping with all other requirements set within the housing policy section and meets all other relevant policies in the Plan. 	
<p>Policy RNP5 - Other development, subdivision of existing plots for building or extension to existing buildings</p> <p>Development such as extensions, replacement houses, building on subdivided plots will be supported if it is demonstrated that: -</p> <ol style="list-style-type: none"> 1. There is no loss to the character or environmental quality of the surroundings. 2. The site is adequately serviced by suitable existing highways allowing safe access and egress to the property. 3. The development respects the amenity of adjoining properties. 4. The development is in keeping with all other requirements set within the housing policy section and meets all other relevant policies of the Plan. 	No comment.
<p>Policy RNP6 - New Tourism Developments</p> <p>Support will be given to new tourism developments which are primarily aimed at high turnover short occupancy forms of holiday.</p>	No comment.

<p>Development proposals related to tourism must demonstrate economic and social benefit to the local community, and this will be weighed against any potential loss of amenity for permanent residents of the parish. Where it is evident that economic and social gain for the local community will not significantly outstrip loss of amenity, the proposed development will not be supported. Particular attention must be given to the siting, scale, and form of proposals for new tourism development, and it is vital that any such development does not compromise the distinctive landscape character and preservation of both the South Devon AONB and the Undeveloped Coast. Proposals for new tourism development in Ringmore Parish are unlikely to be supported unless it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. demand for the proposed development is measurable. 2. undue pressure will not be imposed upon the local road network and other aspects of infrastructure, including water supply, sewerage, and communications systems. 3. the safety of the rural road network will not be compromised. 4. the development will not contribute to light pollution. 5. the natural environment will not be threatened and there will be no loss of habitats. 6. the development will be screened to reduce visual impact, by landform, trees, or hedgerows. 7. the requirements of all other relevant policies in this Plan have been met. <p>Only holiday development proposals that are accompanied with practical measures to ensure that they will remain as holiday accommodation in perpetuity will be supported.</p>	
<p>Policy RNP7 - Expansion and Intensification of Static Holiday Caravan Provision Proposals for expanding or intensifying static caravan park provision in Ringmore Parish are</p>	<p>No comment.</p>

<p>unlikely to be supported unless it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. demand for the proposed expansion or intensification is measurable and cannot possibly be met in any other way. 2. no alternative location exists for the proposed development. 3. the development will not exert adverse visual impact upon the local landscape. 4. undue additional pressure will not be imposed upon the local road network and other aspects of infrastructure, including water supply, sewerage, and communications systems. 5. the safety of the rural road network will not be compromised. 6. the development will not contribute to light pollution. 7. the natural environment will not be threatened and there will be no loss of habitats. 8. the development will be screened on a permanent basis by landform, trees, and hedgerows. 9. the development will contribute to the local economy through creation of employment for local people and generation of income for local businesses. 10. all other policies in this Plan have been addressed. <p>For clarity, expansion and intensification are deemed to include the re-purposing of existing holiday park facilities such as car parks, boat parks, dog-run areas, and waste storage areas to accommodate more static caravans or "lodges".</p>	
<p>Policy RNP8 - Enhancement and Updating of Existing Tourism Facilities</p> <p>Proposals for enhancement and updating of existing tourism facilities, including holiday caravan parks, will be supported, provided that the development will:</p>	<p>.No comment.</p>

<p>1. avoid adverse visual impact upon the local landscape and employ screening by landform, trees and hedgerows as may be necessary to achieve this.</p> <p>2. offer measurable reductions in levels of light pollution and noise.</p> <p>Any proposal to return all or any part of existing holiday provision, including the seafront and carparks, to a natural state will be supported.</p> <p>Proposals for enhancement and updating of tourism facilities must meet the requirements of all other relevant policies in this Plan.</p>	
<p>Policy RNP9 - Employment and Business: providing employment opportunities</p> <p>This Plan supports proposals for expansion of employment opportunities in Ringmore Parish, in particular opportunities for home-working, where:-</p> <ol style="list-style-type: none"> 1. The privacy and amenity of residents in the parish are not adversely affected due to noise, inappropriate or excessive vehicle parking and any other type of disturbance. 2. The privacy and amenity of immediate neighbours are not compromised. 3. The peaceful and tranquil atmosphere of the parish is not unduly compromised. 4. Appropriate proposals for screening and landscaping are included where necessary to preserve the parish aesthetic. 5. Any proposed new buildings are sensitive to their surroundings and comply with other policies in this plan. 	<p>No comment.</p>
<p>RNP 10 - Employment & Business: agricultural development and farm diversification</p>	<p>No comment.</p>

<p>Proposals for repurposing agricultural land and buildings will be supported where:</p> <ol style="list-style-type: none"> 1. the development will not exert adverse visual impact upon the local landscape. 2. the development will not impose additional pressure upon the local road network and other aspects of infrastructure, including water supply, sewerage, and communications systems. 3. the safety of the rural road network will not be compromised. 4. the development will not contribute to light pollution. 5. the natural environment will not be threatened and there will be no loss of habitats. 6. the development will be appropriately screened by landform, trees, or hedgerows. 7. the requirements of all other relevant policies in this Plan are met. 	
<p>Policy RNP11 - Maintain or develop community assets</p> <p>Proposals which seek to maintain or improve the community assets as viable business and important community hubs will be supported so long as they meet the following criteria: -</p> <ol style="list-style-type: none"> 1. "The Journeys End Inn" as a parish asset is maintained such that if a change of use is required for any reason it is still maintained as some form of community space which adds to the social life of the parish and does not diminish its sustainability. 2. All Hallows Church is maintained to continue to provide pastoral care and act as a community hub and thereby continues to support the sustainability of the parish. 3. The facilities of the Parish Room are maintained and/or improved as a social space for the benefit of all to promote the sustainability of the parish. 	<p>It was suggested this Policy was reworked taking account of the following comments (<i>italicised</i>):-</p> <ol style="list-style-type: none"> 1) <i>"Identify the criteria against which improvement to these facilities will be considered.</i> 2) <i>Seek to prevent inappropriate change of change of use of the buildings and require any planning application seeking such a change of use be accompanied by marketing evidence covering a suitable time period say 2 years."</i>

<p>4. The Women’s Institute Hall and grounds are maintained and/or improved as a social space for the benefit of all and continues to play an important part in the sustainability of the parish.</p> <p>5. If any change of use, for any of the above mentioned Community assets is required, it should be supported by a four year marketing plan and consultation with all Stakeholders including residents of the parish.</p>	
<p>Policy RNP12 – Improvement to health and wellbeing facilities</p> <p>Support will be given to any proposal, which contributes towards the health and wellbeing of residents, provided it does not contravene other policies in the Plan.</p>	<p>No comment.</p>
<p>Policy RNP13 – Area of Outstanding Natural Beauty</p> <p>Proposals which retain and enhance the Natural Beauty of the Parish, which sits wholly within the South West AONB, will be supported provided that: -</p> <ol style="list-style-type: none"> 1. The proposals do not cause harm to the appearance and character of the AONB or result in harm to significant views on the approach and across the parish. These public views can be found in appendix iv and Proposal Maps 3 and 4 on the previous two pages. 2. Developments which result in the loss or deterioration of irreplaceable habitats will be refused unless there are wholly exceptional reasons and provision of a suitable mitigation strategy. 3. Development proposals that demonstrate that there are no adverse impacts on the natural environment (landscape and biodiversity) or that satisfactorily mitigate these impacts and enhance the natural environment where there is the opportunity to do so, will be supported. 	<p>No comment.</p>

<p>4. Where mitigating measures are unavoidably required for development to be acceptable within its landscape setting, appropriate landscaping should be employed to mitigate the impact of the development, and such measures should include the use of native species of trees and hedges where planting is required.</p>	
<p>Policy RPN14 – Biodiversity Proposals which support, protect, and enhance the biodiversity of the parish and maintain the Devon Banks and public access via public footpaths, permissive paths, and the coastal path will be supported provided that: -</p> <ol style="list-style-type: none"> 1. Proposals that adversely affect wildlife sites and habitats are avoided. Sites for the Cirl Bunting and Horseshoe and other varieties of bats exist in the parish and enjoy special protection which must be respected. 2. If it is possible to satisfactorily mitigate any adverse effects on the wildlife and biodiversity of the parish this must form part of the planning application at its inception. 3. All new developments should include measures to enhance the biodiversity of the area. 4. Any wildlife survey must be carried out at an appropriate season of the year and must not be conducted immediately after farming methods which would clear the area of species thus masking the true richness of its diversity. E.g. Grass cutting, hay making etc. 	<p>Criteria 2: The wording marked in red should be removed. It would be unreasonable not to enable amendment to a planning application during its consideration. The inclusion of the necessary wildlife/biodiversity information accompanying a planning application would be considered as part of the validation process for appropriate planning applications.</p> <p>Criteria 4: The nature and extent of survey information is a matter for individual planning applications as part of the validation process. This criteria exceeds the usual requirements.</p>
<p>Policy RPN15 – To protect the tranquillity of the environment and maintain the dark skies. Any appropriate development should meet the E1 standard for any outside lighting, including</p>	<p>No comment.</p>

<p>security lighting, as detailed in Guidance Note 01/2020, Guidance notes for the reduction of obtrusive light, issued by the Institution of Lighting Professionals.</p>	
<p>Policy RNP16 – Maintaining the Visual Appearance of the Heritage Character of the Parish</p> <p>All planning applications should avoid a negative visual impact on any Heritage Asset listed in appendices i and ii or in its proximity, especially those that contribute to our 'sense of place' and those that are valued or relevant to our local community. The latter has, in this respect, the similar weight as Grade II Listing.</p>	<p>It was suggested this Policy was reworked taking account of the following comments (<i>italicised</i>):-</p> <p><i>“I would suggest that reference is made to NPs that have passed examination which will give a guide to acceptable and perhaps more robustly worded versions of a Policy that seeks to control development that may affect heritage assets. National and JLP policy is sufficient to protect Statutory Assets. Suggest this Policy is reworded based on the wording in made NPs to protect the non-Statutory Assets that are identified in Appendix ii. Non -statutory assets cannot be awarded the same weight as statutory assets.”</i></p>
<p>Policy RNP17 – Local Green Spaces</p> <p>All planning applications should avoid a negative visual impact and should not infringe on the area of any Green space listed or in its proximity. Proposals for development on these sites will not be supported except in very special circumstances, unless they are related to the enhancement or enjoyment of the Local Green Space:</p> <ul style="list-style-type: none"> • The Town Well site at SX 65085 45879 – the Well Head is Grade II listed. • The Bowling Green – a ½ acre strip of land centred at SX 65107 45711. • The Bus Shelter Green at SX 65262 45963. • The Challaborough Boat Green at SX 64759 44954. 	<p>It was suggested this Policy was reworked taking account of the following comment (<i>italicised</i>):-</p> <p><i>“I would suggest that reference is made to NPs that have passed examination which will give a guide to acceptable and perhaps more robustly worded versions of a Policy that seeks to protect Local Green Spaces.”</i></p> <p>There should be a cross reference in this Policy to Proposals Maps 4 and 5.</p>

<p>Policy RNP18 - Maintenance or Improvement to Transport infrastructure delivering safety improvements for all road users.</p> <p>New developments which deliver improvements to safe access to and within the Parish will be supported if: -</p> <ol style="list-style-type: none"> 1. Any proposed road scheme does not damage the existing network of traditional Devon Banks. <p>Any loss of Devon Bank due to road schemes is to be restored like for like such that the rural character of the parish is not negatively affected.</p> <ol style="list-style-type: none"> 2. Consultation with all "Stakeholders" is exercised prior to any road scheme proposal within the Parish. 3. Existing footpaths, cycle ways and bridleways are maintained or improved. 4. Separation of non-motorised vehicle users from motorised vehicles is improved. 5. To protect the dark Skies of Ringmore Parish, new street lighting should be avoided. 	<p><i>I believe the purpose of this Policy requires some thought. Improvements to the system of roads is under the control of Devon CC such improvements as they may carry out may not require planning approval.</i></p> <p><i>Improvements that result from the implementation of a planning consent I am assuming are the target of this Policy. If so</i></p> <p><i>Examination. Criterion 1) is so restrictive as to allow no improvement. Criterion 2) This happens as a matter of course as planning applications are determined and need not be stated. Criterion 3) Most Groups include a separate Policy in relation to footpaths, bridleways and cycleways. Criterion 4) needs to be more specific. On face value it conflicts with Criterion 1). Criterion 5) is not justified. This is the responsibility of Devon CC: have they been consulted specifically on this issue? Finally here's the wording used in Kingston NP which recently passed Examination:-</i></p> <p><i>"To protect the dark skies of the Kingston parish, new street lighting should be avoided"</i></p> <p>.</p>
<p>Policy RNP19 - Connectivity Infrastructure.</p> <p>Proposals which seek to improve connectivity for either business or private use will be supported, so long as they meet the following criteria: -</p> <ol style="list-style-type: none"> 1. The scale of any such development is sympathetic to the surrounding environment with transmitters/ receivers or other equipment placed such that there is no loss of amenity or damage to Heritage buildings or sites. 2. Any such equipment is sensitivity sighted, screened, or camouflaged such that it does not detract from or diminish the essential qualities of the AONB. 	<p>No comment.</p>

<p>3. Any tower or structure erected to improve connectivity will not negatively impact locally important views, skylines, and vistas.</p> <p>4. In respect of development proposals for communications infrastructure, applicants must demonstrate that they have fully explored opportunities to erect apparatus on existing buildings, masts or other structures and ensure that the number of radio and telecommunication masts are kept to a minimum consistent with the efficient operation of the network.</p> <p>5. Wherever possible, provision should be made for suitable ducting to enable more than one service provider to provide connections to individual properties from connection cabinets located on the public highway, or some alternative point available to different service providers.</p>	
<p>Policy RNP20 - Development of low carbon energy production within the Parish.</p> <p>Schemes which are small in scale, unobtrusive and deliver improvements to low carbon or renewable energy creation within the Parish will be supported if: -</p> <p>1. The scale of any such development is sympathetic to the surrounding environment.</p> <p>2. Any such scheme is sensitively sighted and screened such that it does not detract from or diminish the essential qualities of the AONB.</p> <p>3. Proposals for the change of land use to accommodate the installation of renewable energy equipment, such as solar panels or wind turbines, will be supported only where the visual impact does not affect the amenity of residents or the general parish aesthetic.</p>	<p>No comment.</p>

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