

## **Appendix to Consultation Statement**

### **Consultation Comments and Neighbourhood Plan Steering Group Responses**

The table below summarises the comments received following the Regulation 14 Pre-Consultation to the Draft Neighbourhood Plan (NP) and how these comments have been considered by the Neighbourhood Plan Steering Group (NPSG) and have informed the amendments made in the Regulation 15 Submission Version of the Draft Neighbourhood Plan.

Consultee	Comments	NPSG response
<p><b>South Hams District Council (SHDC)</b></p>	<p>Email dated 23 01 19 advised that the initial HRA screening was carried out without consultation with Natural England which is a statutory requirement. The HRA screening also failed to consider mitigation measures which is now required following the ‘Sweetman’ Judgement. It was therefore necessary to carry out a further HRA Screening.</p> <p>A new HRA Screening/Appropriate Assessment has been carried out by SHDC.</p> <p>The Council’s full consultation response to the Regulation 14 NP is set out below.</p>	<p>Change made to text of NP.</p>
<p><b>Vision</b></p> <p><i>‘To conserve and enhance the unique and special character of our rural and coastal community retaining its heritage significance and its outstanding natural beauty, whilst considering sensitive</i></p>	<p><b>Vision and Objectives</b></p> <p>The Vision effectively provides a good summary of what is seeking to be achieved.</p> <p>Underneath the Vision is a set of Objectives. These are clearly presented and link logically from the Vision to the Policies and are consistent with strategic planning policy.</p>	<p>No changes required.</p>

<p><i>enhancements for the benefit of residents and visitors’.</i></p>		
<p><b>Policy BP1 – Housing Allocation</b>  <b>Provision will be made for the development of a maximum of 13 dwellings on the site to the rear of Holywell Stores. At least 60% of the dwellings will be affordable and include a range of two and three bedroom properties including some bungalows. The highways access should be from the B3392 to the north of St Ann’s Chapel and a pedestrian link should be provided to link into Holwell Lane to provide safe and easy access to the Holywell Stores and the school bus stop in front of the store. A pedestrian link to the Hilltop development should also be provided to enable safe access to the Memorial Hall, children’s playground and playing fields and the other school bus stop. An area of public open space should be provided on site to serve the needs of the residents.</b></p>	<p><b>Policy BP1 – Housing Allocation</b></p> <p>No comments on the Policy.</p> <p>A Proposals Map should be included showing this allocation and other allocations/land use issues that are subject to specific Policies as identified in the relevant Policies below.</p>	<p>A Proposals Map is now included with the NP.</p>
<p><b>Policy BP2 – Other housing development</b></p>	<p><b>Policy BP2 – Other housing development</b></p> <p>Suggest that this Policy be split into two Policies. One related to</p>	<p>Agreed. There</p>

<p><b>Extensions or replacement houses, will be supported where appropriate. Any additional housing should be contained within the settlement boundaries of St Ann's Chapel, Bigbury Village and Bigbury on Sea.</b></p>	<p>extensions the other to replacement houses. Also suggest that each new Policy includes criteria against which proposals are assessed since the phrase 'where appropriate' is open to wide interpretation.</p>	<p>are now three separate policies, one for replacement housing, one for extensions and one for additional dwellings. Criteria against which proposals will be considered have also been added.</p>
<p><b>Policy BP3 – Subdivision of existing plots</b>  <b>The subdivision of existing plots will be permitted only where the following apply:</b>  a) There is no loss to the character or environmental quality of the surroundings;  b) The site is serviced by a suitable existing highway on one or more boundaries;  c) The proposed plot sizes and dwelling sizes are in keeping with other building plots and dwelling sizes in the surrounding area;  d) Proper respect is given to the amenity of adjoining properties including outlook and views;  e) Provision is made for useable private garden space for both the existing and proposed dwellings;  f) The existing front building line is maintained;  g) There is adequate space for off street parking together with areas of soft landscaping;  h) Verges in front of properties are maintained and the front boundary</p>	<p><b>Policy BP3 – Subdivision of existing plots</b>   No comment</p>	<p>Minor changes have been made to this policy.</p>

<p>treatment is consistent with that of neighbouring properties; i) Significant features such as trees, hedges or stone walls should be preserved.</p>		
<p><b>Policy BP4 – Principal residence</b> Due to the impact on the local housing market and uncontrolled growth of dwellings used for holiday accommodation (second homes or holiday lets) new open market housing, other than one for one replacement dwellings, will only be supported where there is a Section 106 Agreement in place to ensure its occupancy as a principal residence. A principal residence is defined as a dwelling where the resident(s) spend the majority of their time when not working away from home. Proof of principal residence includes, but is not limited to being registered on the local electoral roll, at a local school or at the local healthcare centre. Where proposals for the replacement of existing dwellings by more than the number of dwellings to be demolished is approved the additional dwellings will be subject to a Section 106</p>	<p>Policy BP4 – Principal residence</p> <p>No comments.</p>	<p>No changes required.</p>

<p>Agreement to ensure occupancy as a principal residence. Proposals for open market housing (excluding one for one replacement dwellings) without a Section 106 Agreement to ensure occupancy as a principal residence will not be supported.</p>		
<p><b>Policy BP5 – Housing for the elderly</b>  Proposals for sheltered housing or assisted living accommodation will be encouraged providing this is on a previously developed site or site within the village settlement boundaries. It would also need to meet the other policies of the plan, including those relating to layout and design, and any new development would need to ensure that the appearance and character of the villages was not harmed.</p>	<p><b>Policy BP5 – Housing for the elderly</b></p> <p>No comments.</p>	<p>Minor changes have been made to the wording of this policy.</p>
<p><b>Policy BP6 – Residential care and nursing homes</b>  Proposals for residential care or nursing homes will be encouraged providing these are on previously developed sites or sites within the existing village settlement boundaries. Existing homes for the elderly</p>	<p><b>Policy BP6 – Residential care and nursing homes</b></p> <p>Suggest that this be split into two policies. One relating to new proposals and the other relating to the retention of existing facilities.</p> <p>In terms of the former it should be stated that any proposal should comply with other Policies of the Plan.</p> <p>In terms of the latter a marketing test should be included should such a facility become vacant and be subject of proposals for change of use.</p>	<p>Agreed. Now two policies, one for loss of existing facilities and one relating to new care homes or nursing homes. The first policy includes criteria relating to the change of use or redevelopment of existing care</p>

<p>should be retained unless facilities of a similar type, including residential care or nursing homes for the elderly, are provided.</p>		<p>homes or nursing homes. This includes:</p> <p>The need to demonstrate that new facilities of a similar type are provided in the area to replace the facilities being lost, or there is a proven absence of demand for the continuation of the use and the site has been marketed effectively for such use over a period of 12 months at an appropriate level.</p> <p>In circumstances where the loss of an existing care or nursing home is considered to be acceptable, the site should be used for some alternative provision for the elderly, such as the provision of dwellings specifically designed for the elderly, and subject to an occupancy restriction to ensure that the dwellings are used for this purpose in perpetuity.</p>
<p><b>Policy BP7 – General design principles for new housing development</b> When considering</p>	<p><b>Policy BP7 – General design principles for new development</b></p> <p>Suggest the wording ‘will need to be met’ be replaced with ‘should be taken fully into account’.</p> <p>Criteria v) mentions ‘adequate off street parking’. This should be</p>	<p>Changes have been made in accordance with these comments</p>

<p><b>new and replacement housing development, in locations which are considered to be acceptable in principle and which meet the other relevant policies of this plan, the following criteria will need to be met:</b></p> <p><b>i. Proposals should be locally distinctive, reflecting the appearance and character of the area in which the development is to be located. In this respect regard should be had to the design guidance set out in the village studies set out in Appendices 7-10. Innovative contemporary design solutions may be acceptable in some locations providing these do not have a harmful effect on the overall appearance and character of the area and do not by reason of an excessive amount of glazing result in unreasonable levels of light pollution.</b></p> <p><b>ii. The height, scale and density of development should reflect the existing grain, height, density and pattern of development in the surrounding area and the materials used should preferably be natural materials and be consistent with those used for other buildings in the locality, providing these do not detract from the</b></p>	<p>cross reference to Policy BP28 to provide clarity.</p>	<p>and three new criteria added.</p>
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<p>appearance and character of the surroundings</p> <p>iii. Proposals should protect residential amenity and should not have an unacceptable impact on the living conditions of occupiers of neighbouring properties by reason of loss of outlook, loss of important views, including views of the sea, island, estuary, river valleys and moorland, overlooking or loss of privacy, overbearing and dominant impact, noise or other disturbance.</p> <p>iv. Proposals should be designed to limit the impact of light pollution from artificial light resulting in harm to local amenity or areas of intrinsically dark landscape.</p> <p>v. There should be a safe means of access to the site, which does not result in the unacceptable loss of natural features, or the need to provide excessive widening of local roads. Adequate off street car parking should also be provided on part of the site which would not cause nuisance to the occupiers of neighbouring properties.</p> <p>vi. Proposals should ensure that the infrastructure needs of the development can be provided and</p>		
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<p>put in place prior to the commencement of the development where appropriate or provided prior to the occupation of the development.</p> <p>vii. Proposals should retain important natural features including the retention of existing trees, hedgerows and grass verges and should include proposals to enhance the landscaping of the site and improve its biodiversity.</p> <p>viii. Proposals should seek to ensure protection of statutory and non-statutory heritage assets both above and below ground.</p> <p>ix. High levels of sustainability should be used in the design and construction.</p>		
<p><b>Policy BP8 – Existing and proposed employment</b></p> <p>Existing employment facilities should be retained where possible and proposals for new employment, industry or business development will be supported providing the size, scale and any new buildings proposed for the use are sensitive to their surroundings, particularly in proximity to residential properties. In addition, the proposed use should not give rise to use of a large number of heavy goods vehicles, undue noise, disturbance</p>	<p><b>Policy BP8 – Existing and proposed employment</b></p> <p>Suggest this should be split into two policies. One relating to new proposals and the other to the retention of existing facilities.</p> <p>In terms of the former it should be stated that any proposal should comply with other Policies in the Plan following the specific descriptive already present.</p> <p>In terms of the latter a marketing test should be included should such a facility become vacant and be subject to change of use.</p>	<p>Two policies now provided.</p> <p>In relation to proposals for redevelopment or change of use, a marketing condition (12 months) has been attached. This includes the need to demonstrate that the site or premises could not be used for an alternative employment use.</p>

<p>or other type of nuisance.</p>		
<p><b>Policy BP9 – Agricultural development</b>  <b>Proposals for agricultural development requiring planning permission (ie outside permitted development rights) or farm diversification project will be supported provided that:</b>  i. It is sited within the farmstead or existing agricultural complex;  ii. It will not give rise to a significant increase in traffic or use of heavy goods vehicles;  iii. It will make a continuing contribution to the economic viability of an existing farm unit.</p>	<p><b>Policy BP9 – Agricultural development</b></p> <p>Suggest that a further criterion is added that requires the associated infrastructure (ie parking, garden, amenity space) respects the character and appearance of the area).</p>	<p>New criteria relating to associated infrastructure has been added.</p>
<p><b>Policy BP10 – Conversion of Farm and Rural Buildings for Residential Purposes</b>  <b>Proposals for the conversion of farm or rural buildings for residential use will be supported In cases where it can be demonstrated that the premises are no longer required for agricultural or any other economic use, that the building is structurally sound and is capable of conversion without significant rebuilding or extensions and respects the original character</b></p>	<p><b>Policy BP10 – Conversion of Farm and Rural Buildings for residential accommodation</b></p> <p>No comment</p>	<p>No changes required.</p>

<p>of the building. Any new dwelling or dwellings created by the conversion will be subject to the principal residence policy as set out in Policy BP4.</p>		
<p><b>Policy BP11 – Tourism related development</b>  Proposals which will support the existing tourism facilities such as new or extended beach shops, cafés, restaurants, leisure facilities, or enhanced facilities for the RNLI or Coastguards will be supported. These facilities should not however result in undue noise or disturbance or result in a significant increase in traffic, and they should not be located in locations outside of the existing villages, on the beach or any undeveloped part of the coastline or the Avon Estuary. Development on Burgh Island will be supported where it is related to the preservation, renovation or enhancement of the existing hotel, inn or other buildings and assists in the preservation and enhancement of the function of the island as a tourist attraction and important area of open green space.</p>	<p><b>Policy BP11 – Tourism related development</b>  No comment</p>	<p>No changes required.</p>
<p><b>Policy BP12 – Catered holiday</b></p>	<p><b>Policy BP12 – Catered holiday accommodation</b></p>	

<p><b>accommodation</b> Existing hotels, hostels and bed and breakfast establishments should be retained. Proposals for new hotels, hostels, bed and breakfast establishments and extensions to existing facilities will be supported on existing developed sites or within existing village settlement boundaries.</p>	<p>Reference to a marketing test should be included in this Policy as it relates to retaining existing facilities. In terms of new catered holiday accommodation suggest a separate Policy is formulated in which reference to compliance with other Policies in the Plan is mentioned.</p>	<p>Two policies now provided with reference in retention of existing facilities including a marketing test.</p> <p>Policy relating to new facilities also refers to other relevant policies of the Plan.</p>
<p><b>Policy BP13 – Camping and caravan sites</b> Having regard to the size and prominence of existing caravan and camping sites and the harm which has already been caused to the otherwise rural and open character of the parish within an Area of Outstanding Natural Beauty any proposals for new, or the extension or intensification of existing, camping and caravan sites, will not be supported unless it can be demonstrated that the proposal will not cause any harm to the character of the countryside and will be well screened by landform, trees or hedgerows.</p>	<p><b>Policy BP13 – Camping and caravan sites</b></p> <p>Suggest adding ‘or appearance’, to better reflect standard planning practice of considering character and visual impact as discrete areas as follows: <i>‘...unless it can be demonstrated that the proposal will not cause any harm to the character <u>or appearance</u> of the countryside ...’</i></p>	<p>‘Appearance’ has now been added.</p>
<p><b>Policy BP14 – Community facilities</b> Existing retail, leisure and other types of community facilities should be retained unless</p>	<p><b>Policy BP14 – Community facilities</b></p> <p>Reference to a marketing test should be included in this Policy in regard to existing facilities.</p> <p>In terms of new community facilities suggest a separate Policy in which reference to compliance with other Policies in the Plan is</p>	<p>Now two policies one relating to loss of existing facilities and one relating to new facilities.</p>

<p>replaced by community facilities of similar or better quality or value to the local community. New community facilities will also be encouraged including the reopening of The Royal Oak public house, The Bay View Café, and the local shops and post offices at Bigbury Village and Bigbury on Sea.</p>	<p>included.</p>	<p>A 12 month marketing test has now been included in relation to loss of existing facilities</p> <p>The policy relating to new facilities also refers to the need to comply with other Policies of the Plan.</p>
<p><b>Policy BP15 – Local Green Spaces</b>  The designated ‘Local Green Spaces’ as listed above should remain permanently open and will be protected from inappropriate development in accordance with local and national policy for Green Belts.</p>	<p><b>Policy BP15 – Local Green Space</b>  (These comments apply to Policies BP15 and BP16)</p> <ol style="list-style-type: none"> <li>1) The Local Green Space Allocations should be shown on the Proposals Map.</li> <li>2) Whilst the NPPF criteria for assessing LGS are mentioned in the text of the Plan, there appears to be no analysis of the proposed sites against these tests in the Appendices. There are concerns, taking one of the proposed allocations at Bigbury Golf Club, at the extent of land included in the light of these criteria. The NPPF states at criteria c) that a LGS allocation should be:- <i>local in character and is not an extensive tract of land</i></li> <li>3) As such, it is considered each of the sites allocated should be subject of recorded analysis that evidences the reasons for choice.</li> <li>4) The interrelation between Policy BP15 and BP16 is not clear since the same sites are covered by each of the Policies.</li> <li>5) Furthermore these Policies cover a range of issues which in some cases overlap and in others are better covered by separate Policy(ies).</li> <li>6) Finally there are Policy approaches to protect larger areas of ‘green space’. I suggest that I meet you to discuss this and the overall issue of LGS allocation.</li> </ol>	<p>Local Green Space allocations are now shown on the Proposals Map.</p> <p>An analysis of all of all of the Local Green Spaces is now included as an Appendix to the Plan.</p> <p>The Bigbury Golf Club has been deleted as it was considered that this allocation was unnecessary as the need to retain the openness of this site was adequately covered by other policies including the fact that it is AONB, within the Heritage Coast and Undeveloped Coast and would be subject to the separate Policy relating to Open</p>

		Spaces and recreation.
<p><b>Policy BP16 – Open spaces and recreation</b>  Public and private open spaces, used for recreation, leisure or sport should remain open and in use for those purposes including the recreational ground and playing fields adjacent to The Memorial Hall at St Ann’s Chapel, the open space to the north of Bigbury Court and the Bigbury Golf Club. A new area of public open space will be provided as part of any new housing development of 8 or more units. There will also be support for existing and any new or improved recreational facilities including the swimming pools, fitness centres and beach based water sports activities at Bigbury on Sea and Challaborough</p>	<p>Policy BP16 – Open spaces and recreation</p> <p>SEE ABOVE</p>	<p>Following further discussions with SHDC it has been decided to retain this policy.</p>
<p><b>Policy BP17 – Footpaths and cycle tracks</b>  Existing footpaths within the parish will be protected and enhanced where possible and opportunities will be sought and supported to provide new footpaths (whether public rights of way or permissive paths), bridleways and cycle tracks</p>	<p>Policy BP17 – Area of Outstanding Natural Beauty</p> <p>No comment</p>	<p>No changes required.</p>

<p>to link villages and to provide more access to the Avon Estuary and the countryside.</p>		
<p><b>Policy BP18 – Area of Outstanding Natural Beauty</b>  <b>Major development within the AONB will not be supported except in exceptional circumstances where it is specifically designed to meet the identified local needs of the parish and is designed to ensure that development will not cause undue harm to the landscape and scenic beauty of the AONB.</b>  <b>In considering any development within the AONB great weight will be given to:</b>  <ul style="list-style-type: none"> <li>•Conserving and enhancing the natural landscape and scenic beauty of the area;</li> <li>•Conserving and enhancing facilities for wildlife, the cultural heritage and the built heritage of the area;</li> <li>•Avoiding light pollution due to excessive glazing or external lighting;</li> <li>•Avoiding development that would cause undue noise and disturbance, resulting in loss of existing tranquillity;</li> <li>•Avoiding loss of wide, unspoilt and iconic views of the coast and countryside;</li> <li>•Retaining natural</li> </ul> </p>	<p><b>Policy BP18 – Heritage Coast and Undeveloped Coast</b>   No comment</p>	<p>No changes required.</p>



<p>heritage features, including Devon hedgebanks;  •Retaining the ancient and intricate network of winding lanes, paths and recreational routes.</p>		
<p><b>Policy BP19 – Heritage Coast and Undeveloped Coast</b>  Development which would have a detrimental effect on the undeveloped and unspoilt character, appearance and tranquillity of the Heritage Coast, Undeveloped Coast, its beaches and the Avon Estuary will not be permitted. Development will only be permitted in the Undeveloped Coast where the development:</p> <ol style="list-style-type: none"> <li>1. Can demonstrate that it requires a coastal location;</li> <li>2. It cannot be located in an area which is not designated as Undeveloped Coast, such as within existing village settlement boundaries of Bigbury on Sea, St Ann's Chapel or Bigbury Village;.</li> <li>3. Protects, maintains and enhances the unique landscape and seascape character and special qualities of the area;</li> <li>4. Is consistent with policy statements for the local policy unit as set out in the Shoreline Management Plan</li> </ol>	<p>No comment</p>	<p>No changes required.</p>

<p><b>(SMP2) Durlston Head to Rame Head.</b></p> <p><b>5. Is consistent with the policies of the South Devon AONB Unit Management Plan Development for the purposes of agriculture, forestry, public access and enjoyment of the coast and estuaries or for community or recreational facilities that meet the objectively assessed needs of the parish will be supported if it meets the above tests.</b></p>		
<p><b>Policy BP20 – Woodlands, trees, hedgerows and Devon banks</b></p> <p><b>Woodlands, trees, hedgerows and Devon banks which make a significant contribution to the landscape, local amenity, environmental character of the area or are of important nature conservation value should be retained. If it is essential to remove any hedgerows or Devon banks as part of new development this should be kept to a minimum and mitigation measures such as the planting of new hedgerows and provision of Devon banks should be provided where possible.</b></p>	<p>No comment</p> <p>The Tree Specialist, Lee Marshall, has commented generally as follows</p> <p>“Firstly I would like to commend the community/ plan authors for including trees within their documents and seeking ways to protect and enhance the sylvan setting of their parishes in the various guises trees can attribute. I hope I am able to offer comfort that South Hams and West Devon Council is in fact well placed already in using its available resources to seek the protection of trees wherever necessary and expedient. The recent employment of myself as dedicated Tree Specialist and the use of our online TPO request tool, I hope will have greatly aided in our ability to respond. Please find the link to the tool here -</p> <p><a href="https://www.southhams.gov.uk/article/3916/Request-for-a-Tree-Preservation-Order">https://www.southhams.gov.uk/article/3916/Request-for-a-Tree-Preservation-Order</a></p> <p>We are extremely fortunate within our Authority in already having a great depth of knowledge in tree and hedgerow protection, as legislatively required of ourselves under the TCPA1990.</p> <p>The information captured by the parish will be of significant use to themselves as possible land use changes are mooted throughout the life of any plan. However due to resource implications and the robust processes we already have in place I would be cautious in offering any suggestion that we will be able to change our actions in any way regarding tree protection based upon any Local plan Policy or a supporting appendix.</p> <p>We are presently in the early stages of planning a Tree and Woodland Strategy for the Boroughs which will have due regard to such issues and offer greater clarity on what we may or may not be able to practically deliver in terms of tree and hedgerow protection.”</p>	<p>Minor change made to this policy to refer to loss or deterioration of irreplaceable habitats.</p>

<p><b>Policy BP21 – Wildlife sites and biodiversity</b>  <b>Proposals that might affect wildlife sites and habitats should be avoided. If these sites are affected appropriate mitigation measures should be put in place and form part of any planning application proposals.</b></p>	<p><b>Policy BP21- Wildlife sites and biodiversity</b></p> <p>No comment</p>	<p>No changes required.</p>
<p><b>Policy BP22 – Coastline, beaches and the Avon estuary</b>  <b>The coastline, beaches and the Avon estuary shall be protected and conserved and no new development which might cause harm to the stability and/or beauty of the coastal cliffs, coastal pathways, beaches or the Avon estuary will be allowed. Ways to reduce pollution of the Avon Estuary, litter on the beaches and harm to the marine life will be promoted.</b></p>	<p><b>Policy BP22 – Coastline, beaches and the Avon estuary</b></p> <p>No comment</p>	<p>No changes required.</p>
<p><b>Policy BP23 – Views and vistas</b>  <b>Important views and vistas should be protected and any new development which might affect the importance of these views will not be supported. This includes development that might cause harm to the openness of the area, be visible on the skyline, or affect important views of the sea,</b></p>	<p><b>Policy BP23 – Views and vistas</b></p> <p>Other Neighbourhood Plans have identified key views/vistas for protection and identified them on the Proposals Map. As it stands this Policy is too general to be applied to development proposals that may arise. Furthermore South Hams’ Landscape Officer has suggested rewording the Policy as follows:</p> <p><i>‘Important views and vistas should be protected and any new development which <u>might adversely affect the importance of</u> these views will not be supported. This includes development that <u>introduce incongruous features,</u> cause harm to the openness of the area, be visible on the skyline, <u>intrude into</u> or <u>otherwise adversely affect</u> important views of the sea, island, the Avon Estuary, river valleys, moorlands or views of heritage assets.</i></p>	<p>Suggested amendments have been made to this policy and the key views and vistas are now identified on the Proposals Map.</p> <p>The plan showing views now includes two arrows to identify the extent of the views.</p>

<p>island, the Avon Estuary, river valleys, moorlands or views of heritage assets.</p>		
<p><b>Policy BP24 – Built heritage</b> Great weight shall be given to the conservation of both designated and non-designated heritage assets as identified within the Neighbourhood Plan and special regard shall be given to the desirability of preserving the asset or its setting and any features of special architectural or historic interest which it possesses.</p>	<p><b>Policy BP24 – Built heritage</b></p> <p>National and Local policies provide adequate protection for statutory heritage features. You may want to tailor this Policy taking this into account.</p>	<p>No changes have been made to this policy. It was considered necessary to ensure that this policy adequately protected both designated and non-designated assets.</p>
<p><b>Policy BP25 – Transport and highways</b> The existing network of mainly single track roads with passing places should be retained, together with the high Devon banks which are important to the character of the area. Any new development should have regard to the need to retain as much Devon bank as possible whilst ensuring adequate visibility. Speed restrictions should be monitored and enforced, with appropriate speed restriction signage displayed, to avoid accidents due to illegal speeding. Existing footpaths should be maintained, and new or improved footpaths and</p>	<p><b>Policy BP 25 – Transport and highways</b></p> <p>The text in this Policy....'Speed restrictions should be monitored and enforced, with appropriate speed restriction signage displayed, to avoid accidents due to illegal speeding' ....is not a land use issue and should be removed from the Policy. It can be referred to in the text of the Plan.</p>	<p>This sentence has now been removed from the Policy. Policy now includes reference to opportunities for providing further passing places.</p>

<p>cycle ways provided, where possible, to provide better access to the countryside and greater safety for pedestrians and cyclists.</p>		
<p><b>Policy BP26 – Car parks</b> Proposals to develop a car park which is considered essential to support the tourist industry at Bigbury on Sea or to serve the needs of the local community will be supported providing this does not have a harmful effect on the landscape and beauty of the natural environment.</p>	<p><b>Policy BP26 – Car Parks</b> These comments apply to BP25 and BP27</p> <ol style="list-style-type: none"> <li>1) If the sites have been identified for either or both of these proposals, they should be shown on the Proposals Map.</li> <li>2) Each Policy should state that any proposal should comply with other Policies in the Plan</li> </ol>	<p>Car park and air ambulance sites now shown on Proposals Map.</p> <p>Requirement that proposals should comply with other Policies of the Plan now added.</p>
<p><b>Policy BP27 - Air Ambulance Night Landing</b> Proposals to develop further air ambulance night landing sites to serve the parish will be supported providing this does not result in harm to the special qualities of the AONB and Heritage Coast and is controlled so that it does not result in unacceptable levels of light pollution.</p>	<p><b>Policy BP27 – Air Ambulance Night landing</b></p> <p>See above</p>	<p>See above</p>
<p><b>Policy BP28 – Parking provision for new housing developments</b> Proposals for housing development will be required to provide a minimum of one off-street parking space per unit with 1-2 bedrooms and a minimum of two off-street</p>	<p><b>Policy BP28 – Parking provision for new housing developments</b></p> <p>Is this Policy better placed in Housing Section. The usual requirement appearing in Neighbourhood Plans is 2 spaces for a 2 bed property and 3 spaces for 3 bed properties and above.</p> <p>Evidence will need to be provided for the visitor space requirement.</p> <p>The requirement in respect of grass verges needs to be explained and evidenced.</p>	<p>Policy has remained in same location with other transport policies but includes reference to car parking for all types of development nit</p>

<p>parking spaces for units of 3 or more bedrooms. Proposals for housing developments of four or more dwelling units will also be required to provide one further off-street visitor parking space per four dwelling units. Grass verges should be provided in front of properties where appropriate to avoid unauthorised parking taking place in front of residential properties.</p>		<p>just housing.</p> <p>Change made to standards as recommended by SHDC. This also includes the provision of visitor spaces where possible for developments comprising three or more dwellings.</p> <p>Requirements for grass verges further explained and evidenced.</p>
<p><b>Policy BP29 - Connectivity</b> Proposals to improve mobile services or Broadband speeds will be supported subject to the following criteria: (i) transmitters, receivers (or other structures) are located close to an existing road or access tracks; (ii) the equipment is sympathetically designed or camouflaged where appropriate; and (iii) there is no harmful visual impact on skylines or important views or vistas.</p>	<p>Policy BP29 – Connectivity</p> <p>No comment</p>	<p>No changes required.</p>
<p><b>Policy BP30 – Renewable energy</b> Proposals for small scale renewable energy schemes, close to or attached to individual properties will generally be supported</p>	<p>Policy BP30 – Renewable energy</p> <p>No comment</p>	<p>No changes required.</p>

<p>providing these have no harmful impact on the appearance or character of a designated or undesignated heritage asset or on the South Devon AONB, including cumulative landscape and visual impact. Proposals for solar arrays or wind turbines on open farmland will not be supported.</p>		
<p><b>Evidence base</b></p>	<p>The Evidence Base appears to cover all the issues that have been referred to in the Plan. Attention has been drawn, in the comments relating to Policies BP15 AND 16, to the need provide evidenced and robust analysis for the choice of Local Green Spaces. It is suggested I meet you to discuss this issues and others that may arise from this consultation response.</p>	
<p><b>Conclusion</b></p>	<p>The Bigbury Neighbourhood Plan seeks to manage development within a sensitive landscape, whilst enabling small-scale organic development that meets the priorities and needs of the local community. The broad aspirations of the plan are consistent with adopted and emerging local policy.</p> <p>For the most part, this consultation response poses questions or proposes amendments that are designed to make a positive contribution to the next iteration of the neighbourhood plan.</p> <p>It is clear that a great deal of work has been undertaken to bring the Plan to this stage of the Neighbourhood Planning process. The draft plan is well presented with good illustrations and clear plans and graphics. There is however a need for a composite Proposals Map.</p> <p>SHDC considers that the draft Bigbury Neighbourhood Plan can be brought into compliance with local policy and national guidance subject to the advice and guidance provided being followed and would welcome dialogue with the NP group to help to achieve this.</p>	<p>The Bigbury Parish Council and the Neighbourhood Plan Steering Group were appreciative of the positive response and the helpful advice provided by SHDC and they have taken on board the recommendations made.</p> <p>A Proposals Map has also been prepared.</p>
<p><b>Devon CC Historic Environment Team</b></p>	<p>Thank you very much for sending us the link through to the draft Bigbury neighbourhood plan. You have certainly put a lot of work into it.</p> <p>Thank you for incorporating our earlier comments. As I think I said previously, it is good to see a plan with so much historical and heritage detail, and also with such a good use of photos and maps. The production of a neighbourhood Plan provides an ideal opportunity to determine what parts of your historic environment are important to the community and how they are best managed.</p>	<p>Reference to the Barton Fields now set out in Agricultural Section of Plan</p>

	<p>There is an interesting mix of buildings and other structures on your proposed local list and we would be pleased to receive a copy of the finalised list to add to the HER in due course. I note that section 4.19 states that some respondents would like to see more protection for some of the unlisted older buildings and structures. I'm sure you are aware of this, but it is possible to apply direct to Historic England for a site to be protected through listing - <a href="https://historicengland.org.uk/listing/apply-for-listing/">https://historicengland.org.uk/listing/apply-for-listing/</a> .</p> <p>I just have one comment to make and that is, that you might like to also include a reference to the historic landscape characterisation. In short it shows the agricultural nature of the parish with areas of barton fields: relatively large regular enclosures that are likely to have been laid out in the 15<sup>th</sup>-18<sup>th</sup> centuries and also post medieval enclosures, some of which are probably based on medieval fields - <a href="https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/historic-landscape-characterisation/">https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/historic-landscape-characterisation/</a> . It would perhaps fit into section 2. 5 under History of the parish (the paragraph numbering appears to have gone awry here)?</p>	
<p><b>Historic England</b></p>	<p><b><u>Policy BP1: Housing Allocation</u></b></p> <p>Our interest in this policy is to ensure that an understanding of the significance of relevant heritage assets has informed the formulation of this policy in conformity with national and local policy for the protection and enhancement of the historic environment.</p> <p>We note from the Plan that discussions have taken place with South Hams District Council officers on the issues associated with the site selection process and we would hope that these have addressed the necessary considerations given the heritage assets with potential to be affected or harmed which the Site Assessment Matrix on the Plan's website identifies.</p> <p>From this information and the supporting text in the Plan it is not clear how these heritage assets have been assessed or the basis for determining that the site can be developed in principle and specifically with up to 13 dwellings.</p> <p>We understand from previous correspondence that an SEA is being prepared for the Plan. In our response to that consultation we recommended that our guidance on relevant matters be referred to but can find no reference to an SEA or related information on the Plan's website or other indication as to how that guidance may have been utilised (see separate attachment).</p> <p>While we do not necessarily dispute the suitability of the site for the development proposed it would be helpful to provide more demonstrable evidence as to the manner in which relevant heritage assets have been identified and their significance used to inform the policy. This will not only assist in demonstrating conformity with overarching national and local policy for the protection and enhancement of the historic environment but help discharge the requirements for SEA Report preparation.</p>	<p>SEA was sent to Historic England for their further comments.</p>



	<p>Given the liaison with Council officers which has taken place a simple expedient would be to ensure that any advice from its Conservation Officer which gives the site allocation as specifically proposed a clean bill of health is secured in writing.</p> <p>We recommend that this matter is addressed prior to the submission of the Plan to the Council and would be happy to view additional information and update our advice as part of that exercise.</p> <p>Otherwise, we have no other comments than to congratulate your community on the preparation of such a detailed and comprehensive Plan and particularly the impressive extent to which it is underpinned by an understanding of the rich historic character of the area.</p> <p>We wish your community well in the making of its Plan.</p>	
<p><b>Environment Agency</b></p>	<p>Thank you for your consultation of 23 January 2019 providing us with the opportunity to comment on the pre-submission version of the Bigbury neighbourhood plan (Regulation 14).</p> <p>We support the neighbourhood plan's overarching objectives. In particular, the objective to encourage environment friendly farming methods, to conserve and enhance the biodiversity value of the area and to protect and enhance the green infrastructure of the parish. We apologise for our delay in responding and hope that our advice can still be considered.</p> <p>We welcome the range of environmental policies set out in the plan. In particular we are supportive of policy BP21 (Wildlife Sites and biodiversity) however, it would be good if the plan acknowledged the government's 25 Year Environment Plan and the objective of Net Gain of habitats rather than just the appropriate mitigation measures for sites affected by proposals.</p> <p>We also support policy BP15 identifying Local Green Spaces to be protected from inappropriate development. It would be good for the plan to include that these spaces also provide benefits in terms of protecting water quality to the river Avon which already has 'Good' ecological status.</p> <p>We support point 4.104 regarding the long term plan for the Avon Estuary and suggest including a link to the ecological status of the river as mentioned in the above point.</p> <p>We also acknowledge that, whilst the plan references flood risk in two areas, it does not address potential future impacts of flood risk. We recognise that only a very small part of the area is within a flood zone. We suggest it may be beneficial to include reference to climate change data to address the potential flood risk from tidal and fluvial sources over the course of the plan (to 2037).</p> <p>Thank you also for your email regarding the SEA for the neighbourhood plan. We do not provide responses to SEAs normally as we consider that it is unlikely that neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been</p>	<p>Changes made to the Plan to address these comments.</p>

	addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.	
<b>Natural England</b>	<p>Thank you for your consultation on the above dated 22 January 2019.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We welcome the pre-submission version of the Bigbury Neighbourhood Plan. We have no comments to make.</p> <p>Please note however that we have not been able to find the SEA report on your website so we cannot at this time comment on this assessment and its implications for the neighbourhood plan. We would be happy to comment in future should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Corine Dyke on 02080 268177 or <a href="mailto:corine.dyke@naturalengland.org.uk">corine.dyke@naturalengland.org.uk</a>. For any new consultations, or to provide further information on this consultation please send your correspondences to <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>	<p>No changes required.</p> <p>Natural England has been sent a copy of the SEA and comments on this are awaited.</p>
<b>Woodland Trust</b>	<p>Thank you very much for consulting the Woodland Trust on your neighbourhood plan for Bigbury, we very much appreciate the opportunity. Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.</p> <p><b><u>Vision and Objectives</u></b></p> <p>The Woodland Trust is pleased to see that your Neighbourhood Plan identifies the important role that trees play, and that opportunities should be taken to increase tree cover in appropriate locations in Bigbury.</p> <p>Trees are some of the most important features of the area for local people. Already, this is being acknowledged with the Draft Plymouth and South West Devon Joint Local Plan, and Policy DEV24 (Landscape character) which identifies the need for development to conserve and enhance site features, such as trees and hedgerows. Also, Policy DEV30 acknowledges the visual contribution that trees, woodlands and hedgerows make to communities, and how development should avoid the loss of this critical component. Therefore, this should also be taken into account with one of the objectives for the Neighbourhood Plan for Bigbury and include the following:</p> <p><b>‘To conserve and enhance existing woodlands, trees and hedgerows, and given the visual contribution that these make to our communities, avoid the loss or deterioration of veteran trees and hedgerows and minimise the impact of new development.’</b></p> <p><b><u>Natural Environment</u></b></p>	<p>It was not considered necessary to amend the objectives but changes have been made to Policy BP20.</p>

We are pleased to see that Policy BP20 specifically acknowledges the vital contribution of trees and hedgerows in Bigbury, and how your plan can assist with safeguarding these from encroachment, whilst also seeking to protect and enhance. But this should also recognise the fact that development should not lead to loss or degradation of trees in your parish. Increasing the amount of trees in Bigbury will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.

Information can be found here:  
<http://www.magic.gov.uk/MagicMap.asp> and <http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/>

Ancient woodland would benefit from strengthened protection building on the National Planning Policy Framework (NPPF). On 24<sup>th</sup> July 2018 the Ministry of Housing, Communities and Local Government published the revised NPPF which states:

**development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists**

The Woodland Trust believe this must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland and trees. Therefore, we would recommend that Policy BP20 also acknowledges this and should include the following sentence:

*'There should be no harm to or loss of irreplaceable habitats such as ancient trees and veteran trees'*

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information:  
<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

We would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Bigbury. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is

reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them as well.

### **Community Facilities, Health and Wellbeing**

Whilst your Draft Policy BP14, BP15 and BP16 do identify the fact that any shortfalls in community provision is going to be acknowledged as something is taken forward, protecting natural features such as community space provision should also be taken into account. It should seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new development proposals, such as housing. There are Natural England and Forestry Commission standards which can be used with developers on this:

The Woodland Access Standard aspires:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication *Stemming the flow* – the role of trees and woods in flood protection - <https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/>.

### **Woodland Trust Publications**

We would like to take this opportunity to draw your attention to the Woodland Trust's neighbourhood planning microsite: <https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/> which may give you further ideas for your plan.

Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document and is intended for policy planners, such as community groups preparing Neighbourhood Plans. Our guide can be found at: <https://www.woodlandtrust.org.uk/mediafile/100820409/planning-for-ancient-woodland-planners-manual-for-ancient-woodland-and-veterandtrees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff>

In addition other Woodland Trust research which may assist with

	<p>taking your Neighbourhood Plan foreword is a policy and practice section on our website, which provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease: <a href="https://www.woodlandtrust.org.uk/publications/">https://www.woodlandtrust.org.uk/publications/</a></p> <p>Our evidence base is always expanding through vigorous programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query. You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season: <a href="http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/">http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/</a></p> <p>If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this further with you. If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price – Planning Advisor 0343 7705767 <a href="mailto:victoriabankesprice@woodlandtrust.org.uk">victoriabankesprice@woodlandtrust.org.uk</a></p> <p>Best wishes and good luck with your plan  <b>Ian Lings</b> – Local Planning Support Volunteer</p> <p>On behalf of the Woodland Trust</p>	
<b>Marine Management Organisation (MMO)</b>	<p>The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO’s response.</p> <p>The MMO have provided guidance relating to marine licensing and marine planning. They state that planning documents with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the <a href="#">Marine Policy Statement</a> for guidance on any planning activity that includes a section of coastline or tidal river</p>	<p>There are currently no marine plans in place for this part of the coastline although the MMO are currently in the process of developing Marine Plan for the South West</p> <p>The NPSG have reviewed the Marine Policy Statement. The NPSG do not consider it necessary to make any changes to the plan to address the matters raised by the MMO.</p>
<b>South West Water</b>	Confirmation that the anticipated level of new housing for the parish is not going to present any difficulties in our ability to support such.	No changes required.
<b>National Grid</b>	An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high	No changes required.

	<p>voltage electricity assets and high pressure pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>	
<b>Devon Countryside Access Forum (DCAF)</b>	<p>A copy of a position statement prepared by DCAF was sent to the NSPG. The DCAF requested that the NSPG ensure that the comments in the position statement have been followed in the Plan.</p> <p>More specifically, they noted that one of the health and wellbeing objectives is to improve safety. The objective includes provision of bridleways so the DCAF advised that this objective should include reference to increased safety for horse riders, as well as pedestrians and cyclists. One of DCAF's concerns in improving safety for vulnerable road users.</p>	Change made to health and wellbeing objective to include reference to horse riders and all vulnerable road users.
<b>Highways England</b>	<p>Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the A38 to the north. As the plan area is some distance from the SRN, we are satisfied that the plan's proposed policies will not impact on our network and we therefore have no comments to make.</p>	No changes required.
<b>Edgars Ltd on behalf of The Bantham Estate</b>	<p><b><u>1. Introduction</u></b></p> <p>These comments are made by The Bantham Estate (hereon The Estate) in response to the Bigbury Neighbourhood Plan Pre-submission Consultation 2019.</p> <p>1.2 The Estate welcomes the opportunity to provide comments on the emerging draft of the Bigbury Neighbourhood Plan and recognise the considerable effort of volunteers in preparing a comprehensive planning document.</p> <p>1.3 The Bigbury Neighbourhood Plan is a unique opportunity to support the economic, social and environmental sustainability of the parish for at least the next 18 years and The Estate suggests anything incorporated into the plan should be capable of enduring beyond the plan period.</p> <p>1.4 The Estate is a major landowner in the area and has a unique role to play in contributing to the prosperity and sustainability of the area in the short, medium and long-term. Within the parish, the Bigbury Golf Course forms the majority of the land in the ownership of The Estate.</p> <p>1.5 On that basis, The Estate have read the emerging draft plan and would like to provide comments to assist the Parish Council in preparing the final draft.</p> <p>1.6 The Estate welcomes continued discussion with the Parish</p>	No changes required.

	<p>Council and Neighbourhood Plan volunteers in seeking to prepare a final draft of the plan that will successfully deliver the identified vision and objectives.</p> <p>1.7 These comments are provided having regard to national and local planning policy, including the relevant policies of the Development Plan and National Planning Policy Framework.</p>	
	<p><b><u>2.The Bantham Estate</u></b></p> <p>2.1 The Bantham Estate has always been a private estate and today is managed in a careful and respectful way to maintain the strong heritage and community of the area. The continued success of The Estate will require the holistic management of The Estate with a view to becoming self-sufficient.</p> <p>2.2 The Estate manages 728 acres of land, all of which is in the South Devon Area of Outstanding Natural Beauty. This gives The Estate unique responsibilities in the management of the land and The Estate is farmed and managed holistically to enhance its beauty and attract wildlife.</p> <p>2.3 The farmland is arable and grassland under a combination of demanding stewardship schemes with large areas under higher level stewardship or managed organically to Soil Associated standards.</p> <p>2.4 The careful management of The Estate involves working in agreement with Natural England and is carefully monitored to identify the required improvements. The pasture is managed to create an invertebrate rich habitat that supports a range of bird species.</p> <p>2.5 A family shoot is managed within the existing management regime and contributes to the wider ecology and conservation of all the farmland in The Estate’s ownership.</p> <p>2.6 The Estate administers the nearby tidal River Avon and oversees the sporting rights, harbour facilities, boathouses and moorings. The needs of the working river and the welcoming of visitors requires careful management to balance these uses against the need to maintain the river and surrounding as a delicate aquatic habitat.</p> <p>2.7 The Estate owns a number of residential properties in the adjacent parish, primarily in the village of Bantham, including nine 17th Century Grade II Listed cottages that run down to the beach. Repair and improvement works are regularly undertaken to retain and preserve the unique heritage and character of the area. These</p>	<p>(Paras 2.1 – 2.5) Further reference has been included in the Plan to the responsibilities of the Bantham Estate and support given for the holistic management of the estate to enhance its beauty and attraction to wildlife can be included in the text to the Plan.</p> <p>The pheasant shoot is a commercial operation. It does have some advantages in terms of the tourist industry and presumably provides a useful income for the long term management of the estate.</p> <p>However, the recent expansion and intensity of the pheasant shoot operations has caused harm to the quiet enjoyment of the countryside and recreational use</p>

	<p>works form part of the comprehensive approach to the management of The Estate.</p> <p>2.8 Within Bigbury Parish, The Estate is custodian over a large area which includes farmland and the Bigbury golf course to the west of the Avon Estuary. The Golf Course is run by the golf club and the land is rented to the club by The Estate. The Golf Club is identified in the plan as an important community asset that is also used by many visitors to the area.</p> <p>2.9 The Estate’s assets will continue to contribute to the holistic and comprehensively planned approach to managing the land in its ownership in seeking to ensure a long-term sustainable future for the area.</p> <p>2.10 The Estate would like to continue working closely with the Parish Council, Neighbourhood Plan volunteers and other stakeholders to ensure the success of the local area long into the future. The comments provided below are made within that context and The Estate would be happy to discuss them further or answer any questions.</p>	<p>of the Avon Estuary during the winter months when the pheasant shooting is taking place. It has also caused harm to the amenity of the residents who live close by.</p> <p>(Para 2.6) The Bantham Estate does not ‘administer’ the Avon Estuary. The fundus is owned by the Duchy of Cornwall up to Mean High water level. The sporting rights and moorings on the estuary are licensed by the Duchy of Cornwall.</p> <p>The current Manager for the Bantham Estate has now taken over the role of Bantham Harbourmaster working under the auspices of the Salcombe Harbourmaster, who still has overall responsibility and control over the policing of the estuary.</p> <p>(Paras 2.7 – 2.10) The NPSG welcome the support of the Bantham Estate and their willingness to engage with the local community</p>
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		in terms of ensuring the long-term sustainable future for the area.
	<p><b>3.Vision</b></p> <p>3.1 The community’s vision for the future of Bigbury, as identified in the Neighbourhood Plan, is as follows:</p> <ul style="list-style-type: none"> <li>• <i>“To conserve and enhance the unique and special character of our rural and coastal community retaining its heritage significance and its outstanding natural beauty, whilst considering sensitive enhancements for the benefit of residents and visitors”.</i></li> </ul> <p>3.2 Having a unique heritage and being able to trace its origins to when Lt Cr Charles Evans bought the defunct Bantham village Smithy in 1919 and surrounding land in the 1920s, The Estate recognises and understands the unique heritage significance of the area.</p> <p>3.3 It is suggested by The Estate that it has a substantial role to play in assisting the delivery of the vision, particularly as a major landowner in the area which includes the Bigbury golf course.</p> <p>3.4 Indeed, The Estate has recently sought to protect key buildings that contribute to the heritage significance of the wider area and sought to retain the outstanding natural beauty of the land in its ownership through comprehensive and carefully considered management.</p> <p>3.5 Overall, The Estate supports the vision of the community and recognises the importance of the area’s special qualities to the people of the parish and the need to consider sensitive enhancements for the benefit of residents and visitors.</p> <p>3.6 The Estate would welcome discussion with those preparing the plan about how the assets owned or managed by the estate could contribute to delivering an enduring and successful future for Bigbury parish.</p>	(Paras 3.1 – 3.6) The NSPG welcome the support given by the Bantham Estate to the Vision of the community and are pleased that they recognise the importance of the area’s special qualities to the people of the parish and the need to consider sensitive enhancements for the benefit of residents and visitors.
	<p><b>4.Objectives</b></p> <p>4.1 In seeking to deliver the Vision of the community for Bigbury, the Neighbourhood Plan identifies 13 objectives on page 9. The 13 objectives provide the basis on which the policies in the plan have been developed by those preparing the plan.</p> <p>4.2 The objectives stated in the Pre-Submission draft of the plan are as follows:</p>	(Paras 4.1-4.9) The NSPG consider that the objectives of the Plan do adequately cover matters relating to the future of the Bantham

	<ul style="list-style-type: none"> <li>• <i>To conserve and enhance the outstanding natural beauty of the countryside, coastline, beaches and the Avon estuary.</i></li> <li>• <i>To conserve and enhance the designated and non-designated heritage assets within the parish.</i></li> <li>• <i>To conserve and enhance existing woodlands, trees, hedgerows, Devon banks, green spaces and other important features of our natural landscape which are important to the overall environment and have important biodiversity value.</i></li> <li>• <i>To support the agricultural economy of the parish and to encourage environment friendly farming methods which support biodiversity and which retain existing field boundaries and hedgerows.</i></li> <li>• <i>To conserve and enhance the biodiversity value of the area and to protect and enhance the Green Infrastructure of the parish.</i></li> <li>• <i>To restrict new housing development to that which is essential to meeting local needs and only on sites within the existing village settlement boundaries or on the allocated site at St Ann’s Chapel.</i></li> <li>• <i>To maintain the vitality and viability of existing villages within the parish by retaining existing and encouraging new community facilities.</i></li> <li>• <i>To promote a healthy and socially inclusive community by maintaining and enhancing our open space, recreation, leisure and sporting facilities.</i></li> <li>• <i>To retain existing and provide new tourist facilities, if appropriate, ensuring that any new facilities are provided in a manner which preserves the beauty and unspoilt nature of the countryside, the coastline and the beaches.</i></li> <li>• <i>To retain existing employment uses and to provide new facilities for local employment, providing this does not cause harm to the AONB and is in a sustainable location.</i></li> <li>• <i>Any development should be of high quality and sympathetic to the character of the local area.</i></li> <li>• <i>To retain the existing network of local roads and footpaths and encourage the provision of new footpaths, bridleways and cycle ways to provide better access to the countryside and increased safety for pedestrians and cyclists.</i></li> <li>• <i>To seek opportunities for improving infrastructure to make the parish more sustainable.</i></li> </ul> <p>4.3 Overall, The estate welcomes the plan’s objectives, many of which align with the practices and approaches of The Estate to managing the land under its ownership. The Estate would like to highlight the substantial contribution it already makes locally in support of many of the objectives.</p>	<p>Estate and do not see the need for an additional objective as suggested in paragraph 4.4.</p>
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	<p>4.4 The Estate would like to suggest and would strongly support the inclusion of an additional objective in the plan that recognises its ownership, management practices and the need to ensure a long-term and self-sufficient future for The Estate and how that will assist in delivering many of the objectives identified in the plan.</p> <p>4.5 The Estate would welcome discussion with the Parish Council about how an additional objective could be incorporated.</p> <p>4.6 Having read the Neighbourhood Plan, The Estate notes the special qualities of the area as identified by the community whilst recognising the challenges facing the parish, such as the impact of tourism, loss of community facilities and the loss of local shops. The desire of the parish to re-open the pub, shops, café and Post Office is noted by The Estate.</p> <p>4.7 The Estate would like to work with those preparing the plan and wider community to identify opportunities to enhance and improve the sustainability of the villages within the parish in seeking to ensure their long-term future.</p> <p>4.8 The Estate is a significant local employer and is seeking to ensure the long-term sustainability of The Estate as well as provide for new job opportunities.</p> <p>4.9 The Estate would also welcome discussion of how the assets in its ownership could be beneficial in supporting the delivery of the community’s objectives in the short, medium and long term.</p>	
	<p><b><u>5. Employment</u></b></p> <p>5.1 The employment objective, set out on page 20 is as follows:</p> <ul style="list-style-type: none"> <li>• <i>To retain existing and provide new tourist facilities, if appropriate, ensuring that any new facilities are provided in a manner which preserves the beauty and unspoilt nature of the countryside, the coastline and the beaches.</i></li> </ul> <p>5.2 The supporting text in the employment section identifies that opportunities for employment are limited to agriculture, tourism, construction and other services, and local shops and facilities.</p> <p>5.3 Policy BP8 (Existing and Proposed Employment) which seeks to assist the delivery of the employment objective is stated as follows:</p> <ul style="list-style-type: none"> <li>• <i>Existing employment facilities should be retained where possible and proposals for new employment, industry or business development will be supported providing the size, scale and any new buildings proposed for the use are sensitive to their surroundings, particularly in proximity to residential properties. In addition, the</i></li> </ul>	<p>(Paras 5.1 – 5.4) The NPSG welcome the support of the Bantham Estate to the employment objective and to Policy BP8.</p>

	<p><i>proposed use should not give rise to use of a large number of heavy goods vehicles, undue noise, disturbance or any other type of nuisance.</i></p> <p>5.4 Overall, The Estate support the intention of this policy. In the supporting text, The Bigbury golf club is identified as providing local employment and this is welcomed by The Estate. It is the intention of The Estate to ensure the golf course can endure for the long-term on a sustainable basis.</p>	
	<p><b><u>6.Agriculture</u></b></p> <p>6.1 The agriculture objective, set out on page 21 of the plan is as follows:</p> <ul style="list-style-type: none"> <li>• <i>To support the agricultural economy of the parish and to encourage environment friendly farming methods which support biodiversity and which retain existing field boundaries and hedgerows.</i></li> </ul> <p>6.2 The supporting text states that the needs of the farming community will be supported and that proposals to support the future viability of this sector will be supported, including through farm diversification.</p> <p>6.3 Policy BP9 (Agricultural Development), which seeks to assist the delivery of the agriculture objective is stated as follows:</p> <ul style="list-style-type: none"> <li>• <i>Proposals for agricultural development requiring planning permission (ie outside permitted development rights) or farm diversification project will be supported provided that:</i> <ul style="list-style-type: none"> <li><i>i. It is sited within the farmstead or existing agricultural complex;</i></li> <li><i>ii. It will not give rise to a significant increase in traffic or use of heavy goods vehicles;</i></li> <li><i>iii. It will make a continuing contribution to the economic viability of an existing farm unit.</i></li> </ul> </li> </ul> <p>6.4 Overall, The Estate support the intention of this policy. However, it is suggested that limiting any farm development requiring permission, or farm diversification project, to the existing farmstead or existing agricultural complex may not allow any development to be sited in the most appropriate location for operational or other purposes.</p> <p>6.5 The Estate would welcome discussion on how an appropriate level of flexibility could be incorporated into this policy to deliver on the plan’s objective of supporting agriculture in the parish.</p>	<p>(Paras 6.1 – 6.5) Policy BP9 criterion (i) was included to be consistent with the Policy DP15 of the previously adopted LDF which required <i>‘all development in the countryside to be well related to an existing farmstead or group of buildings, or be located close to an existing settlement.</i></p> <p>Policy TTV26 of the adopted JLP also seeks to avoid isolated development in the countryside.</p> <p>The policy has however been amended to allow agricultural development outside farmsteads or existing agricultural complexes where it can be shown that there are very special reasons why these cannot be located elsewhere.</p> <p>There are no</p>

		<p>farmsteads on the land owned by the Bantham Estate within the Parish of Bigbury and the farmland is currently managed by farmers who owns farmyards which fall outside of the estate boundaries on the Bigbury Parish side of the Avon Estuary. If there is a need to provide buildings related to farm activities which are carried out within the estate it will be necessary to provide sufficient justification to demonstrate why this is required.</p>
	<p><b><u>7. Tourism</u></b></p> <p>7.1 The tourism objective, set out on page 22 of the plan is as follows:</p> <ul style="list-style-type: none"> <li>• <i>To retain existing and provide new tourist facilities, if appropriate, ensuring that any new facilities are provided in a manner which preserves the beauty and unspoilt nature of the countryside, the coastline and the beaches.</i></li> </ul> <p>7.2 The supporting text outlines that tourism is a very important part of the local economy and provides local employment. It is identified that some provision of catered accommodation has been lost and there is now a shortage of this kind of facility in the parish.</p> <p>7.3 The supporting text encourages development of new catered facilities provided any new buildings do not cause harm to the openness of the AONB, Heritage Coast, or Undeveloped Coast.</p> <p>7.4 Policy BP11 (Tourism Related Development) which seeks to assist the delivery of the tourism objective is stated as follows:</p> <ul style="list-style-type: none"> <li>• <i>Proposals which will support the existing tourism facilities such as new or extended beach shops, cafés, restaurants, leisure facilities, or enhanced facilities for the RNLI or Coastguard will be supported. These facilities should not however result in undue noise or</i></li> </ul>	<p>(Paras 7.1 – 7.6) We do not want to see the encroachment of tourist related development outside of existing villages. This would also be contrary to JLP Policy DEV25.</p> <p>The NPSG do not wish to encourage tourist related development in the open countryside.</p> <p>Extensions or development specifically related to the future sustainability of the Golf Club as an important recreational</p>

	<p><i>disturbance or result in a significant increase in traffic, and they should not be located in locations outside of the existing villages, on the beach or any undeveloped part of the coastline or the Avon Estuary. Development on Burgh Island will be supported where it is related to the preservation, renovation or enhancement of the existing hotel, inn or other buildings and assists in the preservation and enhancement of the function of the island as a tourist attraction and important area of open green space.</i></p> <p>7.5 Overall, The Estate welcome the provision for proposals which support tourism and the recognition that tourism plays a significant role in the local economy and provides local employment. The Estate understands the importance of the AONB, Heritage Coast and Undeveloped Coast and the need to avoid harmful impact on these designations.</p> <p>7.6 The Estate suggests that, given the importance of tourism to the local economy and a need to protect the character of the existing settlements, the policy should incorporate sufficient flexibility so as to not restrict appropriate tourism development to only coming forward within the existing villages.</p>	<p>facility is given support in the Plan. This will also have benefits in terms of tourism. However, proposals relating to possible development relating to the golf club is adequately covered in the Health and Wellbeing Section.</p>
	<p><b>8. Community Facilities</b></p> <p>8.1 The community facilities objective, set out on page 23 of the plan is as follows:</p> <ul style="list-style-type: none"> <li>• <i>To maintain the vitality and viability of existing villages within the parish by retaining existing and encouraging new community facilities.</i></li> </ul> <p>8.2 The supporting text states that a survey of the parish was sent out that included a question on the use of existing community facilities and whether it was considered they should be protected. The responses are presented in a table in the plan on page 23.</p> <p>8.3 The table highlights that the Bigbury Golf Club is well-used by the local community. The Golf Club is used by 60% of the respondents, with 45% stating it needs to be protected.</p> <p>8.4 Indeed, the Neighbourhood Plan supporting text states that “it will be seen that all of the existing community facilities are well used particularly the Memorial Hall, St Lawrence Church, the Bigbury Golf Club...”.</p> <p>8.5 The Estate agrees that the golf course is well used but would highlight the Golf Club is currently privately owned and run, with a membership fee for using the course paid to the club.</p>	<p>(Paras 8.1 – 8.8) The NPSG welcome the support being given by the Bantham Estate to the future of the golf club and would be pleased to discuss with them how land in its ownership and other community assets may support other elements of the policy that could help the parish in seeking to meet its objectives and ensure the long-term sustainable future of the parish.</p>

	<p>8.6 Policy BP14 (Community Facilities), which seeks to assist the delivery of the community facilities objective is stated as follows:</p> <ul style="list-style-type: none"> <li>• <i>Existing retail, leisure and other types of community facilities should be retained unless replaced by community facilities of similar or better quality or value to the local community. New community facilities will also be encouraged including the reopening of The Royal Oak public house, The Bay View Café, and the local shops and post offices at Bigbury Village and Bigbury on Sea.</i></li> </ul> <p>8.7 Overall, The Estate welcome the support for the retention of community facilities and wish to see the Bigbury Golf Club on a sustainable footing for the future.</p> <p>8.8 The Estate would welcome discussion about how land in its ownership and other community assets may support other elements of the policy that could help the parish in seeking to meet its objectives and ensure the long-term sustainable future of the parish.</p>	
	<p><b>9. Health and Wellbeing</b></p> <p>9.1 The health and wellbeing objectives, set out on page 24 of the plan are as follows:</p> <ul style="list-style-type: none"> <li>• <i>To promote a healthy and socially inclusive community by maintaining and enhancing our open space, recreation, leisure and sporting facilities.</i></li> <li>• <i>To retain the existing network of local roads and footpaths and encourage the provision of new footpaths, bridleways and cycle ways to provide better access to the countryside and increased safety for pedestrians and cyclists.</i></li> </ul> <p>9.2 Overall, The Estate welcome the support for maintaining and enhancing open space, recreation, leisure and sporting facilities. The Estate also recognises the importance of retaining existing routes and the need to provide better access to the countryside for all users.</p> <p>9.3 Paragraph 4.92 states that the club is one of the larger providers of local employment and is a genuine tourist attraction for the parish and wider area. The plan suggests some people in the parish are members of the club and the facility should remain.</p> <p>9.4 The Estate understands that the Bigbury Golf Course is used by some people in the parish and recognises the desire to see the facility retained.</p> <p>9.5 The Neighbourhood Plan proposes to designate the land as Local Green Space. The supporting text to this section states that the Neighbourhood Plan can identify and designated Local Green Spaces which are of particular importance to the local community.</p> <p>9.6 Policy BP15 (Local Green Spaces), which seeks to assist the delivery of the health and wellbeing objective is stated as follows:</p> <ul style="list-style-type: none"> <li>• <i>The designated 'Local Green Spaces' as listed above should remain</i></li> </ul>	<p>(Para 9.1 - 9.4) The NPSG welcome the support from the Bantham Estate in terms of maintaining and enhancing open space, recreation, leisure and sporting facilities.</p> <p>The NPSG also welcomes the Bantham Estate's support for retaining existing routes and providing better access to the countryside for all users. It is proposed to have further discussions with the Bantham Estate to discuss how this might be achieved.</p> <p>(Para 9.5 – 9.19) Agreed. The Bigbury Golf Club is no longer designated as Local Green Space.</p>

	<p><i>permanently open and will be protected from inappropriate development in accordance with local and national policy for Green Belts.</i></p> <p>9.7 The Neighbourhood Plan states the purpose of the designation is to protect these sites from inappropriate development with proposals to be treated in decision making in accordance with local and national policy for Green Belt.</p> <p>9.8 To be designated as Local Green Space, the proposed sites must meet all of the criteria set out in paragraph 100 of the NPPF. The policy states the following:</p> <ul style="list-style-type: none"> <li>• The Local Green Space designation should only be used where the green space is: <ul style="list-style-type: none"> <li><i>a) in reasonably close proximity to the community it serves;</i></li> <li><i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li><i>c) local in character and is not an extensive tract of land.</i></li> </ul> </li> </ul> <p>9.9 The Estate suggests that as a golf course, the proposed designation does not meet all of the required criteria and the Local Green Space designation is not appropriate in this instance.</p> <p>9.10 The Estate recognises that, as a golf course, the land is used for recreation. However, The Estate would submit this does not meet the requirement for the site to be demonstrably ‘special’ and suggest the land does not hold a particular ‘local significance’.</p> <p>9.11 The Estate suggests that, as a golf course, the site is not particularly ‘local’ in character and as such is also considered to be an extensive tract of land.</p> <p>9.12 The Estate would highlight that the proposed Local Green Space washes over areas of built development, including a private club house with associated catering, dining and shop facilities with a holiday let.</p> <p>9.13 Overall, The Estate would conclude the golf course does not meet the stringent tests set out in national and local policy to be designated as Local Green Space. Furthermore, this designation is likely to hamper the objective of the parish in seeking to retain the golf course through securing a long-term sustainable future for the course. This is considered further in the section below.</p> <p>9.14 Policy BP16 (Open Spaces and recreation), which seeks to assist the delivery of the health and wellbeing objective, is stated as follows:</p> <ul style="list-style-type: none"> <li>• <i>Public and private open spaces, used for recreation, leisure or sport should remain open and in use for those purposes including the recreational ground and playing fields adjacent to The Memorial Hall at St Ann’s Chapel, the open space to the north of Bigbury Court and</i></li> </ul>	
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	<p><i>the Bigbury Golf Club. A new area of public open space will be provided as part of any new housing development of 8 or more units. There will also be support for existing and any new or improved recreational facilities including the swimming pools, fitness centres and beach-based water sports activities at Bigbury on Sea and Challaborough.</i></p> <p>9.15 The supporting text (paragraph 4.92) to this policy highlights how the golf club is operating in a financially challenging external environment. Indeed, in seeking to retain the golf club as an important local facility, the plan states that support will be given to any necessary improvements, extensions and/or such development which would ensure the long-term viability of the club.</p> <p>9.16 The Estate welcomes and supports the inclusion of text recognising the need to ensure the long-term viability of the club and the ways in which this could be achieved. The Estate also welcome the proactive stance of the plan in seeking to find a comprehensive and sustainable long-term future for the golf course.</p> <p>9.17 However, the Estate suggest the proposed Local Green Space designation will be a substantial hurdle for any proposal to overcome that will significantly hamper the delivery of the health and wellbeing objectives and Policy BP16 (Open Spaces and Recreation).</p> <p>9.18 Therefore, the Estate suggest the designation of the Golf Course as Local Green Space appears to run contrary to the positive and proactive stance being taken in the objectives, policy and supporting text elsewhere in the plan.</p> <p><u>Conclusion</u></p> <p>9.19 In conclusion, The Estate suggest that the Local Green Space designation is not the most appropriate mechanism for achieving the long-term sustainability and retention of the golf course facility in this instance. This is particularly the case given the existing AONB, Heritage Coast and Undeveloped Coast designations that already wash over the area.</p> <p>9.20 Alternatively, it is suggested that an additional objective in the plan could further provide support to The Estate in seeking a long-term and sustainable future for the land in its ownership and the continuing contribution being made to the parish of Bigbury.</p>	
	<p><b><u>10.Natural Environment</u></b></p> <p>10.1 The natural environment objectives, set out on page 27 of the plan are as follows:</p> <ul style="list-style-type: none"> <li>• <i>To conserve and enhance the outstanding natural beauty of the countryside, coastline, beaches and the Avon estuary.</i></li> <li>• <i>To conserve and enhance existing woodlands, trees, hedgerows, Devon banks, green spaces and other important features of our</i></li> </ul>	<p>(Paras 10.1 – 10.2) The NPSG are pleased that the estate is being managed in a way which does support the natural environment</p>

	<p><i>natural landscape which are important to the overall environment and have important biodiversity value.</i></p> <ul style="list-style-type: none"> <li><i>• To conserve and enhance the biodiversity value of the area and to protect and enhance the Green Infrastructure of the parish.</i></li> </ul> <p>10.2 The Estate consider the practices and approaches of The Estate to managing the land under it owns make a substantial contribution in support of these objectives.</p> <p>10.3 Policy BP19 (Heritage Coast and Undeveloped Coast), which seeks to assist the delivery of the natural environment objectives is stated as follows:</p> <ul style="list-style-type: none"> <li><i>• Development which would have a detrimental effect on the undeveloped and unspoilt character, appearance and tranquillity of the Heritage Coast, Undeveloped Coast, its beaches and the Avon Estuary will not be permitted. Development will only be permitted in the Undeveloped Coast where the development:</i></li> </ul> <ol style="list-style-type: none"> <li><i>1. Can demonstrate that it requires a coastal location;</i></li> <li><i>2. It cannot be located in an area which is not designated as Undeveloped Coast, such as within existing village settlement boundaries of Bigbury on Sea, St Ann’s Chapel or Bigbury Village;</i></li> <li><i>3. Protects, maintains and enhances the unique landscape and seascape character and special qualities of the area;</i></li> <li><i>4. Is consistent with policy statements for the local policy unit as set out in the Shoreline Management Plan (SMP2) Durlston Head to Rame Head.</i></li> <li><i>5. Is consistent with the policies of the South Devon AONB Unit Management</i></li> </ol> <p>10.4 The Estate recognises the unique qualities of the environment in the parish, including the land in its ownership. The undeveloped coast is a unique selling point for the entire district of South Hams which draws millions of visitors to the region each year.</p> <p>10.5 The Estate suggests the policy being proposed in the Neighbourhood Plan introduces additional tests that development will be required to meet beyond those required by local and national planning policy.</p> <p>10.6 The Estate would welcome discussion about how the policy could be suitably worded to ensure it is aligned to the local plan, including Policy DEV25 Undeveloped Coast and Heritage Coast.</p>	<p>objectives of the Plan.</p> <p>(Paras 10.3 – 10.6)</p> <p>It is considered that Policy BP19 does accord with JLP Policy DEV25 and see no need to amend the wording of this policy.</p>
	<p><b>11. Conclusion</b></p> <p>11.1 These comments are made by The Bantham Estate (hereon The Estate) in response to the Bigbury Neighbourhood Plan Pre-submission Consultation 2019.</p>	<p>(Paras 11.1 – 11.6)</p> <p>The NPSG welcome the support given by the Bantham</p>

	<p>11.2 The Estate is a major landowner in the area and has a unique role to play in contributing to the prosperity and sustainability of the area in the short, medium and long-term. Within the parish, the Bigbury Golf Course forms the majority of the land in the ownership of The Estate.</p> <p>11.3 The Estate would like to continue working closely with the Parish Council, Neighbourhood Plan volunteers and other stakeholders to ensure the success of the local area long into the future.</p> <p>11.4 In seeking to support the preparation of a final draft of the Bigbury Neighbourhood Plan, The Estate has made comments on the vision and objectives as well as the following themes within the plan:</p> <ul style="list-style-type: none"> <li>• Employment;</li> <li>• Agriculture;</li> <li>• Tourism;</li> <li>• Community facilities;</li> <li>• Health and wellbeing; and</li> <li>• Natural environment.</li> </ul> <p>11.5 With specific reference to Bigbury Golf Club, The Estate welcomes the proactive stance of the plan in seeking to find a comprehensive and sustainable long-term future for the golf course. However, it is suggested that, as a golf course, the Local Green Space designation is unlikely to be a suitable mechanism to successfully deliver the plan's objectives.</p> <p>11.6 The Estate welcomes continued discussion with the Parish Council and Neighbourhood Plan volunteers in seeking to prepare a final draft of the plan that will successfully deliver the identified vision and objectives.</p>	<p>Estate to the Neighbourhood Plan and look forward to having further discussions with the Estate in being able to deliver the Vision and to be able to meet the objectives of the Plan.</p>
<p><b>John Cullen, Hingston Farm</b></p>	<p>Para 4.76 Misleading and factually incorrect CROW Act 200 is the law you can't opt out and has nothing to do with access to existing footpaths.</p>	<p>Agreed. Text changed accordingly.</p>
	<p>Para 4.90 If a requisite of a 'local green space' is that it is local in character and is not an extensive tract of land, does the Golf Course meet these requirements.</p>	<p>Debateable in terms of whether it is local and to what extent it can be regarded as an extensive tract of land. However, the NPSG decided to remove the designation of Golf Course as a Local Green Space as the retention of this</p>

		<p>area as an open space used for recreational purposes is adequately covered by the Open Space and Recreation policy.</p>
	<p>Para 4.95 You refer to the footpath network on the west side of the estuary as inadequate. What is the basis for this assertion? The footpath is part of the Avon Estuary walk. It has interpretive audio clips on route, geocoaching locations and its own website. <a href="http://southdevonaonb.org.uk/explore/walks-trails/avon-stuary-walk">http://southdevonaonb.org.uk/explore/walks-trails/avon-stuary-walk</a>. It is probably the least inadequate footpath in the parish!!</p>	<p>The reference to the footpath network being inadequate relates to the fact that there is no continuous footpath along the Estuary. It is not a criticism of the standard of footpaths which do exist particularly those which pass through John Cullen's land where the footpath system is clearly signposted and does provide excellent views of the Avon Estuary.</p> <p>Text changed to avoid ambiguity.</p>
	<p>Para 4.96 The use of the word 'unfortunate' is a perjorative term and has no place in this document. You say the footpaths could be greatly improved. As referred to above we have both well maintained and extensive footpaths in this area. If you want to improve the paths in the parish maybe take a look at the north of the parish where there are virtually no footpaths.</p>	<p>The clause 'It is unfortunate' has now been deleted but the reference relates to the fact that there is no continuous footpath system from Bigbury on Sea to Doctor's Wood.</p> <p>The Plan does state at para 4.99 that 'The northern part of the parish is not well served in terms of off road walking facilities and opportunities</p>

		to provide some off road public rights of way would be beneficial particularly for residents living in the northern part of the parish.
	Para 4.97 To complain that the footpaths are muddy in the countryside is ridiculous. When it is wet high traffic paths will get muddy, and of course they are unsuitable for cyclists who have no right to be using the footpath network let alone complain about it.	<p>The reference to the fact that footpaths can be quite muddy was not intended as a criticism. It is one of the reasons why most of the existing footpaths in the parish are currently considered to be unsuitable for cyclists and those with mobility needs.</p> <p>National guidance and District Policies encourage the provision of cycle routes and upgrading existing and providing new routes suitable for horse riding and cycle use as well as routes suitable for those with mobility needs. This is also a policy contained in the Position Statement of the Devon Countryside Access Forum.</p>
	Para 4.101 I think the heritage coast stretches inland more than 300m!	Agreed. Changed to approximately 3km.
	Figure 13 Page 29 incorrectly shows the areas of ancient woodland. See below	Ancient woodland designation is

		correctly shown on this map.
	Para 4.118 Recommendation for TPO on sycamore in field south of Butterwell Barn. See below	The sycamore tree in question is within the Bigbury Village Conservation Area and is already under statutory protection. A TPO is therefore not necessary.
	Appendix 6 Local Green Spaces: Is it appropriate to list someone's private garden as a local green space re Pond at Butterwell Barn and also dovecote at Bigbury Court which as a listed structure already has its curtilage protected. Surely we should not just be layering up the red tape where it is not warranted.	Land which includes the pond, adjacent to Butterwell Barn has been removed from designation as a Local Green Space.  Land in front of Bigbury Court is private land but not part of a garden. The listing of the dovecote provides no statutory protection for the land around the dovecote.
	Appendix 7: I might have misread but there doesn't appear to be reference to the houses between St Ann's and Bigbury Village.	These properties are not within the village of Bigbury or the village of St Ann's Chapel.
	Appendix 11: You suggest a TPO on sycamore of Butterwell Barn. This tree currently forms a part of a higher level environmental steward scheme under which it is being managed. It would be inappropriate to have two potentially conflicting layers of bureaucracy.	This tree is within the Bigbury Conservation and is already therefore under the statutory protection. It is considered that there is no need to make an application for a TPO for any of the trees within the Bigbury Village as

		previously recommended in the report prepared by the Parish Tree Warden.
	<p>Page 79: Drs Wood is referred to as ancient woodland. This is incorrect. The part with the footpath through which was originally part of Bigbury Manor is not ancient. The original sessile oak has been totally removed. What is there now is pollarded sycamore regrowth and overgrown orchards and meadows. However the right hand arm of the wood which was never part of the manor is still the original Sessile oak and probably could be considered Ancient woodland.</p> <p>It is surely unwarranted to voice unfounded supposition about a piece of woodland in isolation. The vast majority of woodland in the parish is used for pheasant shooting in the winter. Why is it only deemed appropriate to mention Drs Wood? Why is every other shoot operation in the parish not similarly mentioned?</p> <p>As the owner of Dr Wood I can assure you that all sporting rights are retained by myself. However within the remit of this report the legal status of my rights is totally irrelevant!!</p> <p>What is wood 6? It appears to be floating in the river? If it does refer to the right hand part of Drs wood then you could probably refer to it as ancient.</p>	<p>The whole of Doctors Wood (left and right sides) are included within the Ancient Woodland statutory designation as advised by SHDC.</p> <p>The reference to the designation of Doctors Wood as 'Ancient Woodland' is not a designation placed on this wood by the Parish Tree Warden or NPSG.</p> <p>Our understanding is that the pheasant shoot within Doctors Wood is now part of the commercial shooting activities carried on in the Bantham Estate irrespective of who owns the shooting rights. As far as the NPSG is aware there are no other 'commercial' shooting operations taking place within the Parish. However, reference to the shooting rights at Doctors Wood</p>

		have now been removed.
	Appendix 12 Views and Vistas: Presumably these can only be publicly accessible views. View no 15 has been taken from private land with no public access. Why are all the views clustered together? Looks like someone just did their favourite walks. Also all the arrows are pointing in random directions.	View No 15 is taken from the northern end of Footpath 4 to the south of Bigbury Court Farm.  A full survey of the parish was undertaken by the NPSG and other parishioners also provided recommendations as part of the consultation exercise.  There are a few views situated in close proximity to each other but with views in different directions as shown by the arrows.
	Appendix 13: Underground Reservoir is not brick domed but stone domed.	Change made accordingly.
<b>Discovery Surf School</b>	<p>The Discovery Surf School have provided some very helpful and informative background information with regard to this local business, tourist and community facility.</p> <p>Para 2.32 – Discovery Surf School is a community facility and we are a business that provides a service all year around. We run a local Surf Club for children which annually has up to 70 members. The club provides surf lessons, an annual surf competition, beach cleans and a sociable group for children to be part of. Discovery is part of the vision for the future as we are already part of the community, for example we work with many schools throughout the South Hams and Plymouth providing lessons, activity weeks and after school clubs for hundreds of school children every year, we are nationally renowned as a centre of excellence for Special Needs surf lessons, as we provide specialist surf lessons for children and adults with many additional needs including autism, downs syndrome, physical disabilities etc. We also work with The Wave Project and Lifeworks charities for special needs surfing.</p> <p>Discovery Surf School is also regarded as a destination facility for Bigbury on Sea as a well regarded and long established surf school. Many of the bookings we take are from people who are specifically coming to Bigbury to surf and we are often asked for recommendations for accommodation/eating out once they have</p>	<p>New paragraphs added after para 2.32 and 4.93 relating to the Discovery Surf School.</p> <p>Reference made to employment of 25 seasonal staff in para 4.70.</p>



	<p>booked their lessons with us.</p> <p>Discovery Surf School has a centre at Bigbury on Sea (next to the Venus Café), a licence to operate from the beach (we open this facility seasonally) and a shop at Challaborough (also seasonal).</p> <p>We did some rough calculations and we have an average of 11,000 customers (lessons and hire) a year – this is a significant number of locals and tourists coming to Bigbury on Sea to surf with us.</p> <p>Para 4.70 – the Employment section – we employ 25 seasonal staff.</p> <p>Para 4.93 – Health and Wellbeing section. We are a watersports centre and encourage people to use our facilities as part of their enjoyment of the area and health and fitness. We provide many types of lessons, including surf and paddle boarding and we work with the South Devon AONB to provide discounted lessons for local residents (PL, TQ and EX postcodes). We also hire out surfboards, wetsuits, bodyboards, paddle boards and kayaks from Bigbury on Sea and at Challaborough (which is also open on a seasonal basis).</p> <p>Discovery Surf School also has online surf educational resources – 110% Surfing Techniques. Our instructional videos (x4 volumes of 110% Surfing Techniques and a Surfboard Guide, as well as stand-alone videos. These videos are highly regarded and our biggest markets are in the USA, Brazil and Australia.</p>	
<p><b>Trish Bagley (Bigbury Parish Tree and Footpath Warden)</b></p>	<p>Ms Bagley asked whether reference could be made to the need to keep existing hedges and encourage trees within the hedge lines for bat roosting and feeding.</p>	<p>Additional text added to para 4.121 in relation to Greater Horseshoe Bats, dormice and Cirl Buntings and minor change to Policy BP20 to include need to replace trees as part of mitigation measures.</p>
<p><b>Mr &amp; Mrs G Phillips, owners of The Korniloff</b></p>	<p>We are submitting our <u>objection</u> to the proposal of quote: ‘The Members of the Steering Group and the Parish Council would like this site (The Korniloff) to be replaced as a residential home or used as some other other purpose which serves the need of the elderly.’</p> <p>We hope that the attached letter and information will be helpful.</p> <p>Korniloff has been our main residence for the past 20 years and we intend to stay living in the village in alternative accommodation after selling Korniloff.</p> <p>Para 4.61 and Page 73 (right hand side, 5<sup>th</sup> paragraph up). Our comments are to explain our objections and concerns.</p> <p><u>The Care Home</u></p> <p>To complete</p>	<p>The quote was not entirely correct as the word used was ‘retained’ and not ‘replaced’.</p> <p>The retention of existing care homes is a policy of the Joint Local Plan (Policy DEV18). We have now changed the policy to include a marketing/ viability test.</p>

		<p>If it can be demonstrated that the loss of the care home is considered acceptable having regard to the criteria set out in this policy there would be a requirement for the site to be used for an alternative use, which would serve the needs of the elderly. A use such as housing, specifically designed for the elderly, and subject to an age related occupancy condition would be an appropriate alternative use in these circumstances.</p>
<p><b>Nick Alford – Prospective purchaser of The Korniloff</b></p>	<p>Paragraph 4.53 – the Draft Plan suggests that existing building sites should only allow less than 5 dwellings – this is too arbitrary as the number of dwellings capable of being accommodated on a site depends on its physical size – a site could take 1 or 100 houses depending on its acreage. This should be changed to simply state that over development will be resisted - a typical industry standard density is 12 houses to the acre . As drafted this goes against government planning policy which is seeking to maximise development on existing developed sites to relieve pressure on the need for green field sites where possible. It is still possible to take into account other factors such as the landscape designation in determining what is appropriate but this arbitrary figure should be deleted.</p>	<p>Reference to the number of dwellings has now been removed.</p>
	<p>Paragraph 4.59 New developments unless 1 for 1 replacements will be principle residence only –This will detrimentally affect developments and prices creating an artificial 2 tier market and will stop renewal and investment – The building trade is a major employer in the south hams and most small scale development schemes are replacing out of date, poorly constructed and unsightly housing for more modern, well designed energy efficient housing which is a key desire of government policy – this is a misguided attempt to provide housing for permanent residents (which does not even ensure local people will be given any priority) and will just stifle development and renewal which is key to the longevity of a community and also the building industry in the south hams which is a major employer in the</p>	<p>This is a policy for new housing only and will not affect one to one replacement houses or the tenure of existing properties. It is a policy which has received widespread support from the local community</p>

	<p>district – we support positive allocations such as St Ann’s Chapel which is the right way to meet local housing need – the figures given stating local housing need responses create a misleading impression when only expressed in percentage terms and are relatively small in absolute numbers – the numbers should be stated too, to avoid misrepresenting the facts.</p> <p>We object to the proposal to restrict new development where not replacement dwellings to be for principle dwellings only ie no 2nd home owners. This will not redress the concern that permanent residencies are being replaced by second home owners as the existing stock will remain unrestricted. All it does is create an artificial market for an extremely limited number of new houses, but more worryingly potentially restricting values and thereby making redevelopment proposals uneconomic. This will ultimately impact on the employment prospects for the building trade and their suppliers. By way of an example our company alone has approximately 30 people on site in the locality at any one time, plus sub contractors and if redevelopment is no longer viable we will simply stop trading which will seriously affect those people we currently employ. Redevelopment is a good thing as it often increases the supply of housing stock, the lack of which is the main driver behind house price inflation, whilst new houses are generally of a better design standard, more energy efficient and improves the appearance of the community, which in itself will attract greater visitor numbers that is good for the local economy in a tourist dominated region. In addition people are now able to live and work in different ways with the advances in technology, meaning many people now lead more flexible lifestyles and we are seeing greater numbers of people living full or part time in the district – the traditional school holiday peak seasons are no longer the norm with visitors spending more time in the region throughout the year, or working from home, all of which means that there is no need for such a restriction. Instead the positive approach adopted at St Ann’s Chapel is to be supported whereby affordable homes subsidised by a larger development on agricultural land ensure affordable local housing is provided. If that is the true aim of the plan then consideration should be given to further development land being released for housing.</p> <p>Many second home owners become permanent residents as some of the steering committee have done themselves, so we object to this well meaning but flawed policy which will achieve nothing positive, but will have negative consequences.</p>	<p>and it is not proposed to change this.</p>
	<p>Policy BP3 - subdivision of plots – this should be encouraged where there is sufficient space to do so, rather than discouraged. It stops green fields from being developed if sufficient land within the development boundary can be found. It also contradicts government policy which encourages intensification of development on existing brownfield sites.</p> <p>Respect of outlook and views – The policy as drafted goes against government policy which has a presumption in favour of development – the draft policy is too general and should be specific to publicly important views only. To suggest any impact on any one individuals view should mean a proposal should be refused is</p>	<p>Policy BP3 does permit subdivision of existing plots providing the criteria set out in this policy can be met.</p> <p>The policy states that ‘proper respect’ be given</p>

	<p>ridiculous. No property has a right to a view and whilst we accept sensitivity should be considered where possible, this policy would prevent even minor alterations to houses (eg a dormer window) let alone extensions or development proposals.</p> <p>We suggest a policy whereby it is stated that where possible consideration should be given to neighbouring properties by utilising ground levels to minimise height levels would be more achievable without stifling investment in the villages. The important public views should be set out for protection rather than a blanket parish wide policy.</p> <p>The existing front building line is to be maintained – this is too restricting and depends entirely on the circumstances of the individual site – some sites should maintain a building line – others may be capable of alteration without the need for this restriction eg where a house sits in a generous plot</p>	<p>to the amenity of adjoining properties including views. Policy DEV20 of the Joint Local Plan requires development proposal to have proper regard to the pattern of local development and the wider development context and surroundings in terms of style, local distinctiveness, siting, layout, orientation, <b>visual impact, views</b>, scale, massing, height, density, materials, detailing, historic value and character, and the demands for movement to and from nearby locations.</p> <p>The criterion to maintain the front building line has been amended to clarify that this relates to front and side elevations which front on to roads.</p>
	<p>Para 4.56 states that the resident survey concluded that 81% of people said some or all of new builds should be principle residence only – some is very different to all and I think the plan should be more open about how many people said some as the proposed policy suggests all should be when it may be the case that a large number of people just required some to be built.</p> <p>There is limited mention of the employment types in the parish or any meaningful analysis – if there was it might lead to a better recognition of the building industry and its investment, money generation through wages and expenditure in the south hams and massively important contribution to the local economy in</p>	<p>We consider that the fact that 81% of the respondents said that some or all of new builds should be principal residence only is a significant amount. The results showed</p>

	<p>comparison to the other examples given in the plan – we should suggest that this is included in the final version of the plan and that policies should aim to maintain and encourage this key employment sector to thrive.</p>	<p>that 49.9% considered that <u>all</u> private housing built within the parish should be restricted to main residence only and 31.45% considered that some should be restricted. The policy as worded relates only to new build dwellings other than replacement housing and therefore not all new dwellings.</p>
	<p>Paragraph 4.61 suggests that Korniloff is retained as a residential home or to serve the needs of the elderly ie assisted living – steering group desire for sheltered housing or assisted living – it is unusual for a plan to be property specific and this should be deleted. The care home has closed down as it is uneconomic to run, as has recently occurred in several locations in the district. Staffing recruitment issues have been a real problem and the location is not sustainable with limited public transport and the remote location. The site would be a good brownfield housing site and should be allocated as such. In such a case the type of housing should not be dictated to by the steering group. It is a matter for the market to decide.</p>	<p>At the time of writing this Plan Korniloff was the only care home in the parish. It had previously been a popular place to reside and well supported by the local community. It will be requirement for anybody wishing to change the use or to redevelop the premises to demonstrate why it would not be possible to retain this use or to provide a suitable alternative care or nursing home facility for the elderly.</p> <p>There is also a requirement for any alternative type of development on this site to be for a use specifically designed for elderly.</p>
	<p>BP6 – the Korniloff care home has closed down due to it no longer</p>	<p>See above.</p>

	being commercially viable. As with several care homes in the area which have recently closed there are issues with the remote location and retaining staff where the public transport facilities are very restricted. As such alternative elderly facilities will not attract interest – the market is more focussed in providing such facilities in towns rather than villages where there is an array of accessible facilities for residents and staff. We object to this proposed policy.	
	The age summary has a typo on the 0-9 age group in the parish.	
<b>Stuart Watts</b>	Mr Watts is pleased that Cockleridge Ham is designated as a Local Green Space and supports better footpath between Bigbury on Sea and Doctors Wood.  Refers to need to remove words ‘to discuss’ at end of Agriculture Objective.  Policy BP10 – minor change to wording to remove ‘in cases’ and to add words ‘that any conversion’ be added before ‘respects the original character....’	Changes made accordingly.
<b>Charles Harrington</b>	Considered that the Plan represented an excellent effort. Pointed out that the golf course and club house were developed in the 1920s not the 1930s (para 2.13) and the Memorial Hall was used for private events by parishioners (para 4.7).	Changes made accordingly to paras 2.13 and 4.7.
<b>Gill Middleton</b>	Expressed thanks to NSPG to preparing Neighbourhood Plan and regret that this was not in place some 5 years ago as the village of Bigbury on Sea has seen an influx of inappropriate, oversized and inconsiderate development. Due to the increased numbers of rental properties and holiday homes we have seen the community spirit sucked out of the village.	No changes required.
<b>Pam Trundle</b>	Reference to para 2.33 re weekly bus to Plymouth advising that the bus journey is one and a quarter hours not two hours.	Para 2.33 Amendment made to journey time.
<b>Alison Bender</b>	Immensely impressed by this document and the work that has gone into it. She has paid particular attention to the sections on Bigbury on Sea and she endorses the recommendations.	No changes required.
<b>Gilbert Snook</b>	Given the very thorough consultation that has occurred, Site 1 which was subject to speculative outline planning consent should not receive detailed planning consent being at odds with the Neighbourhood Plan. Given the relative isolation of our community, access and actual need should take precedence. Site 4 has been clearly identified as the best site and he supports this. The redirection of the road under the plans for Site 1 will increase car speeds through St Ann’s Chapel and pedestrians are more likely to be killed or injured.  Overall well thought out plan.	Details for Site 1 had not been submitted at the time of writing this report. If a new application is submitted it will need to be considered in relation to the policies in force at that time.
<b>John Simes</b>	Excellent document and great read. Pointed out two typos. Para 2.12 comma after ‘restaurant’. Para 4.66 insert space after comma ‘design,high’. Para 4.92 suggested rephrase as follows: ‘Any new development which would be prominent on the skyline should only complement – but not exceed- the existing clubhouse building’s volume and profile’.	Typographical errors have been corrected and para 4.92 changed as recommended.

	<p>Para 2.38 Suggested reference to e-living and 'green' housing and village planning, the ownership/stewardship of the golf club should be embracing these approaches and creating new facilities and footpaths/viewing zones for bird watchers, Nature lovers, landscape painter and performing arts.</p> <p>The golf club could easily include a rural business hub within its premises. Along with farming businesses, it should be linking work-experience and rural educational programmes offered by schools and colleges. A 'green' industrial estate?</p> <p>Para 4.96 the positioning of animal feeding/watering troughs close to gates and footpaths tends to result in some paths being impassable at certain times of the year. This should be addressed by landowners.</p>	<p>Community-led housing scheme at St Ann's Chapel aspires to achieve Passivhaus certification with a shared aspiration of achieving this using natural materials.</p> <p>The criterion relating to sustainability in Policy BP7 has been amended to include a requirement to aim for zero levels of carbon emissions.</p> <p>It was considered that it would not be appropriate to require the provision of a rural business hub or green industrial estate within the Policies of Plan.</p>
<p><b>Richard Baker</b></p>	<p>Have you counselled resident opinion in Houghton regarding the Holiday Parks in Challaborough, they have to cope with the traffic and the numbers in the summer totally dwarf any permanent residents.</p> <p>I think that your dates for the park being open in your NP are wrong. The park is only closed for 4 weeks in a year.</p> <p>There is concern that the park is being used for permanent residents and that any move to 'lodges' may encourage this due to the initial investment cost. There are national definitions of 'holiday use'.</p>	<p>Houghton is within the Parish of Bigbury and the residents of this area have had the opportunity to comment on matters relating to the Holiday Park at all stages of the Neighbourhood Plan process. There have, however, been no comments made by these residents to the Challabrough Holiday Park. Ringmore Parish Council and the Ringmore Parish</p>

		<p>Neighbourhood Plan Steering Group have also been consulted on the Plan but no comments have been received.</p> <p>The Holiday Park does have permission to open for eleven months a year. This permission was granted a few years ago but so far they have not exercised this. Last year the park was closed, as usual, by the middle of November and opened on 1<sup>st</sup> March 2019. The top part of the park, which is within the Ringmore Parish, is however closed for just six weeks. A change to the Holiday Park opening dates has been made.</p>
<p><b>Bryn and Sue Evans</b></p>	<p>We occupy Portolano, a property at the rear of the Korniloff site, which we have owned for the last 17 years. We know that the site is to be sold and note that it is now under offer to a local developer, so are naturally concerned regarding the type of development that may be envisaged for the site and its effect upon our current outlook. We participated in the questionnaire to assist with information to include in the Village Plan and have a current copy of the document. We feel that the final version of the Plan is a very well-constructed document and addresses many of the difficulties of development planning and community concerns likely to face the Parish in the coming years. Whilst noting that the period for formal response has just lapsed we hope that the following remarks can nevertheless be taken into account.</p> <p>Under Policy BP3 of the Village Plan provision is required under section (d) for the protection of outlook and views of adjoining properties and under section (f) for front building lines to be maintained. However there is a case for equal maintenance of side elevation boundary lines. Most developers at Bigbury-on-Sea seek planning applications for buildings that utilise the full width of the available plot in order to maximise the sea views offered. This not only markedly reduces the likely views of existing properties to the</p>	<p>Changes have been made to the care home policy which now includes a marketing test.</p> <p>The policy also states that any alternative development including new housing would need to meet to be specifically designed for elderly.</p> <p>The policy relating to the subdivision of</p>



	<p>rear but also results in less green space being retained on the re-developed plot. There has been a significant reduction of green space in developments permitted at Bigbury-on-Sea in the last 10 years.</p> <p>As we know the Korniloff has been a residence for older people for at least the last 20 years. There is a case for requiring any redevelopment of the site to include lower cost housing units which would allow older local residents to ‘downsize’ from their existing homes, when it became difficult for them to maintain them, but still remain in the community. There is provision for this under Policy BP6 in the Village Plan.</p> <p>We also hold the view that given the potential for 13 dwellings to be provided at St. Ann’s Chapel there is little or no need for additional housing at Bigbury-on-Sea. The applications sought by developers are not to satisfy any local need but rather for their own commercial gain. In nearly all cases sites have either involved applications for larger dwellings or for multiple units, with the extra occupancy putting stresses on the narrow local road layout and other facilities, particularly the sewage system. Policy BP4 in the Village Plan should begin to mitigate this problem.</p> <p>One of our concerns is that the Village Plan is not likely to be finally adopted into planning legislation until near June with the larger Joint Local Plan unlikely to be adopted until about the same date. We trust that if the developer of the Korniloff site should apply for planning permission prior these documents being adopted that the planning authorities would judge the merits of any such application with reference to the contents of both these documents.</p> <p>We are sorry that these comments are after the due date but nevertheless hope that they can be taken into account.</p>	<p>existing plots includes a criterion relating to the need to respect the amenity of adjoining properties including outlook and views. The policy relating to design principles for new development also require the need to protect residential amenity. The NPSG considered that it would not be appropriate to have a criterion which prevented any increase in the width of properties eg side extensions as there are many instances where side extensions or new development to the side of existing properties would not have a harmful impact on the views or outlook of adjoining or nearby properties.</p> <p>We have however amended the policy to make it clear that the definition of ‘front building line’ refers to front and side elevations fronting on to a road, for example where a building is on the corner</p>
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		of two roads it would need to respect the front building lines of both roads.
<p><b>Cathy Case, Lower Willings Farm</b></p>	<p><i>1.6 – St Anns Chapel is the only sustainable village.</i></p> <p>The plan group have failed to pay any attention to what makes our parishes villages sustainable. Instead taking the default Joint Local Plan position as read and not challenging it for our parish. They have allowed St Anns Chapel to become the affordable housing mecca, keeping all residents who need affordable housing congregated in one 'lower property value' location. Not allowing any mixing of residents from higher value Bigbury-on-Sea properties with those who are more financially deprived. This social exclusion means that the residents/ holiday home owners of Bigbury-on-Sea who usually need cleaners, plumbers, electricians, gardeners, key holders etc all have to bring in workers by car &amp; van to deliver these services. Bigbury-on-Sea has significant employment opportunities as well – the Burgh Island Hotel, Pilchard Inn, Venus Café, Beach Shop, Lifeguards, Surf School, Beach Barista, Henley Hotel, Causeway Leisure Club, Golf Club and Farm. All employees have to drive into the village as there is no affordable housing in walking distance.</p> <p>St Anns Chapel by having a shop &amp; pub is by default 'sustainable' – unyet the opportunities to work are minimal.</p> <p>The school buses to 2 primary schools and 2 secondary schools serve all of the villages – yet this sustainability feature of all of our villages is not mentioned.</p> <p>We can all see what amazing community cohesion there is in Kingston by having affordable social housing right in amongst holiday homes and permanent residents. They have such a sense of community that is lacking in our hollow villages.</p> <p>The plan is so clear that any development must be within existing residential areas. It fails to recognise that if a home owner has an incredibly valuable Bigbury property plot they are not going to want to develop it for any wider community value (eg BP5).</p>	<p>St Ann's Chapel is the only village in the Parish which scored highly enough to be regarded as a 'sustainable village'. In addition to a shop and public house it also has a post office, Memorial Hall and recreation facilities. It is also 3 miles of the A379 road and within 5 miles of the higher order centre of Modbury. The Sustainability Assessment used is that provided by SHDC. St Ann's Chapel had a fairly generous score of 27 out of a total of 40 points. Bigbury on Sea had a score of 14.5. This includes giving points for being a local employment and having outdoor recreation facilities.</p> <p>The plan does not prevent sites within Bigbury or Bigbury on Sea being used for affordable housing but the Plan does provide for the affordable housing needs of the Parish at St</p>

		<p>Ann’s Chapel, which is a more sustainable location.</p> <p>Policy BP5 refers to housing for the elderly. This policy allows such uses on previously developed sites or sites within village boundaries. If the Korniloff site is allowed to be developed for use other than use as a care home the amended policy would allow this site to be redeveloped for housing for the elderly, providing the marketing test for use as a care home has been satisfied.</p> <p>Bigbury Parish is within the AONB, with the southern half of the parish also within the Heritage Coast and the Undeveloped Coast. These designations are also part of the SHDC Joint Local Plan and in themselves result in a restriction to the location of any new development.</p>
	<p><i>Vision &amp; obj 3.3</i>  <i>To restrict new housing development for essential local need <b>and</b> only on sites within the existing villages.</i> Is tantamount to absolutely no new housing.  No home owner/ brown field location would want to offer up high value land for affordable housing. So if the 13 houses are built at St Anns Chapel this plan will not facilitate any new affordable housing developments. That is it. For 20 years. The affordable housing</p>	<p>The policy does not prevent new housing for people who want to live in the parish. It will only prevent new</p>

	needs of my 4 children when they leave home in 10-15 years will be unable to be met.	<p>housing, other than replacement housing, being used as second homes and holiday lets and it will also ensure that prices for new houses are kept at a reasonable price.</p> <p>The Plan will be reviewed every 5 years and if there is a need for more affordable housing during the period of the Plan this can be considered. However, at the moment the Neighbourhood Plan has been designed to provide for the affordable housing needs currently anticipated during the period of the Plan.</p>
	<p>2.29 <i>'few other employment opps in the village'</i> Completely misleading statement. There are LOTS of jobs and work needing to be undertaken in the parish. There is a bigger problem finding people to do work.</p>	These employment opportunities are set out in para 2.29.
	2.32 <i>community facilities</i> - what about the oyster shack?	Now added
	2.34 <i>Poor public transport</i> - is not the problem with attracting families with children. Property house prices are!!	Hence the need for affordable housing and a policy requiring new housing to be for main residence only.
	<p><i>Vision and Objectives 'Which preserves the beauty and unspoilt nature of the countryside'</i> – leaves no scope to do anything. Any change is changing 'unspoilt nature' and will be used by NIMBYs to veto all projects.</p> <p>To seek opportunities for improving infrastructure - particularly the importance of road passing spaces and improved road vision to help reduce hold ups. Not mentioned.</p>	Bigbury Parish is within the AONB, which is has the highest status of protection in relation to ensuring that the natural landscape is conserved and

		<p>enhanced (NPPF para 172). The southern half of the parish is also within the South Devon Heritage Coast and Undeveloped Coast. This Vision and this objective recognise the importance of these designations.</p> <p>Policy BP25 now includes reference to the need to encourage opportunities of providing additional passing places.</p>
	<p>4.51 Why don't you just say we don't want any more housing for 20 years anywhere!  According to 4.51 you can build within 'your plot'. But according to BP3 there are so many restrictions to this your neighbours will always find reasons to object. When BP4 is live the proliferation of subdivided plots will cease – but similarly we will not get more people actually living in Bigbury-on-Sea – they will just develop fancier &amp; bigger holiday homes.</p>	<p>There is no reason why some of the existing plots cannot be subdivided providing that any additional housing is for main residence purposes only. There does, however, need to be better control over new development to ensure that subdivision of plots does not result in loss of amenity to existing residents and that new development is not overly cramped and just designed to accommodate more housing only suitable for second homes and holiday lets.</p>
	<p>BP5 &amp; BP6 – The high value sites in our parish will never be developed into residential care or nursing homes! So how can you</p>	<p>Policy BP6 does seek to prevent</p>

	<p>achieve 4.6? It is a complete contradiction. You have missed such an exciting opportunity here to provide retirement living for your parishioners.</p>	<p>the loss of the existing care home at Korniloff but if this cannot be achieved the policy does require this site to be used for housing specifically designed for the elderly. Other opportunities might arise for new residential or nursing homes within settlement boundaries or on previously developed sites.</p>
	<p>BP7 is SO restrictive nothing can happen. How can any building anywhere not have some impact on iii.</p>	<p>The wording in this criterion is 'unacceptable impact'.</p>
	<p>4.71 Why do employment opportunities need to be in built up areas or previously developed sites? Surely this is something that should be welcomed wherever it may be so long as it is sensitively done.</p>	<p>It is necessary to protect the AONB and the South Devon Heritage Coast and as such new employment development should generally be retained within existing settlement boundaries or previously developed sites. New employment opportunities might also be brought forward as part of farm diversification measures.</p>
	<p>4.74 We have huge need for unskilled temporary labour on our farm. Typically 6-9 workers per day throughout the winter. These all have to be brought in from an hour away. Other farm employees travel from Kingston, Ivybridge &amp; Aveton Gifford as they would be unable to afford to have a house in the parish.</p>	<p>The new affordable housing in St Ann's Chapel would be available for farm workers who live or work in the parish. The journey time from Kingston,</p>

		Ivybridge and Aveton Gifford is considerably less than one hour.
	4.78 All diversification projects create some harm through noise, traffic or disturbance. The inclusion of this text puts a veto on these projects – NIMBYS will use this. REALLY GUTTING for my business going forward.	The wording in the paragraph is ' <i>significant harm</i> '.
	BP9 completely misses the point that sometimes agricultural relocation is beneficial in the wider farm business development. Particularly in locations that may give rise to pollution of watercourses or other sensitive locations. This is often one of the reasons traditional farmsteads move to the tops of hills/ skylines. Modern farm buildings need to be substantial in size to cope with modern farm machinery & scale of operation. Trying to keep buildings within existing agricultural complexes is often not practical. All modern farms use HGV's throughout the year for the movement of animals & crops and the delivery of seeds, fertilisers, diesel, oils & feed etc. It may be by allowing a farm to put up new facilities there are less road movements as more efficient deliveries are possible. I think this policy is really damaging for our farm business development and will massively hamper our farm going forward.	Amendment now made to Policy BP9.
	BP24 – My elderly parents are absolutely <b>distraught</b> that their farmhouse has been listed as a heritage asset. They cannot believe that a small group of parishioners are able to suddenly impose a listing on their property which materially affects its value and their ability to improve it and change it. They are disgusted that this is an outcome of the plan process. If it did have such significant heritage value it would have been listed – but it has not been. They are livid.	Mr and Mrs Tucker, who live in Mount Folly Farmhouse, have not previously objected to the inclusion of the Mount Folly Farmhouse as a Local Heritage Asset. This is not the equivalent to being on the statutory list and would not affect their ability to improve or change it. It should improve rather than reduce its value but NPSG are willing to exclude this from the list of local heritage assets, if the owners are objecting to this listing.

	<p>BP25 – this is inadequate. There is nothing about improving passing spaces or improving visibility. As will be seen with the Royal Oak car park. The restriction of pulling in spaces will have major traffic implications for residents.</p> <p>Particular hot spots include the stretch from Holwell Farm to the SWW tanks at the top of the hill. And the Bardens Garage corner. Improvements to the Holwell Farm stretch could have been tied into the housing development. A vision verge near the top would help prevent so many hold ups.</p> <p>Whenever the Bardens Garage site is redeveloped this passing space provision must be included.</p> <p>Tristan, Weyside &amp; Cranmere have very dangerous pedestrian entrances right onto the busy B3392. Opportunities to maintain road width (for farm vehicles – artics etc) while improving the pedestrian use will be really useful in future.</p>	<p>Amendment made to Policy BP25 to include opportunities for more passing places.</p> <p>Amendment also made to Appendix 8 to include need for passing place if site of Bardens Garage is redeveloped.</p>
	<p>BP26 – There has been no mention of bus parking. This has been a hugely contentious issue for several years. We are wanting to encourage public transport but there is no where for busses to park in Bigbury-on-Sea. They are not allowed in the SHDC operated car park. They are not allowed in our field car park (following a judges ruling). The closest location would be on the single yellow line on Folly Hill or the Golf Club.</p> <p>The Surf School uses numerous buses throughout the school activities weeks, and there are other bus companies who visit. We should be encouraging bus transport!</p> <p>There has been no mention of improving parking facilities for the Oyster Shack or Pickwick Inn. The Oyster Shack have had issues with insufficient parking at peak times. If we want to ensure that businesses remain viable supporting adequate parking for local businesses seems important.</p>	<p>An amendment has been made to Policy BP26 to include the need for coach parking facilities.</p> <p>The Oyster Shack did make provision for some overspill car parking in the field opposite the shack during the peak holiday season last summer.</p> <p>There was a larger car park available for The Pickwick Inn prior to the recent development which was permitted on part on the site. The car parking available is however adequate most of the time and customers have to find alternative places to park during the very busy periods.</p>
	<p>BP29. As part of the government’s previous mobile infrastructure project considerable survey work was undertaken to solve the parishes not spot reception areas by putting a mobile phone mast near Bigbury Golf Club. Due to the operators concern for being</p>	<p>Opportunities to put up further mobile receptors are being</p>



	<p>taken to another judicial review application by Bigbury-on-Sea residents they did not take this project to apply for planning permission. The designers considered the only way to cover all of the not spots was to have a high mast. Your phrasing ‘no harmful visual impact on skylines’ is impossible to deliver with any mast. You cannot deliver the parishioners wish for mobile signal if you do not have more flexibility on this policy wording. This objective will fail to be delivered.</p>	<p>considered. It is not yet known whether there is likely to be a need for a mast at Bigbury Golf Club or land nearby but impact on the skyline will be an important consideration in relation to any new mast.</p>
	<p>Annexe 10 The coastal path from Chall-B-o-S is owned &amp; maintained by the farm.</p>	<p>Amendment made to Appendix 10.</p>