

# Ivybridge Neighbourhood Plan



# IVYBRIDGE

*2<sup>nd</sup> November 2015*

**Consultation on the draft plan**

**The response in general**

**Key consultees' main points**

**Responding to those points**

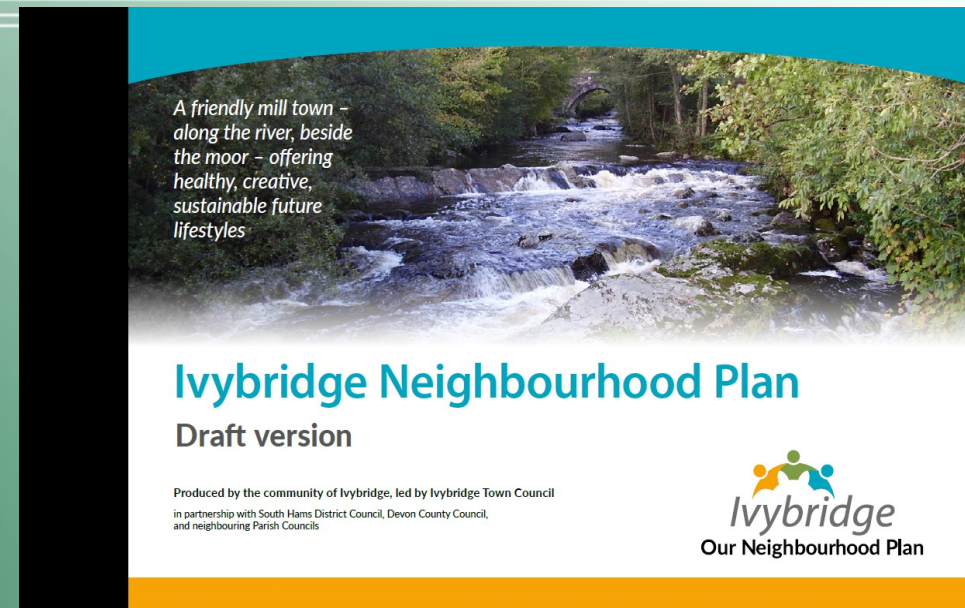
**Next steps**

***Lee Bray – Planning and Regeneration Consultant***

# Consultation on the draft plan



- The draft plan was published in early July
- It was open for consultation for more than 6 weeks (until 21<sup>st</sup> August)
- Publicity material was on display at the Town Hall and in the Watermark, and a summary leaflet was delivered to every household.



- The plan was available on the Town Council website, alongside draft versions of supporting documents.

# The response in general



There has been a fairly good level of response to the draft plan.

The local community is generally supportive of the policies and proposals.

The statutory and key consultees have raised some issues requiring changes. Many of these will improve the plan and make it more robust and effective.

Some respondents have raised objections which more fundamentally oppose the plan and its policies.

# Who has responded?



South Hams District Council (who have a **key role** as LPA)

Highways England

Natural England

Devon County Council

Environment Agency

Hannick Homes

South West Water

Gladman

North, East and West Devon  
Clinical Commissioning Group

The local community

# What are their main points?



Does the plan comply with government regulations?

Does it conform with the strategic development plan?

Is the vision sufficiently unique to Ivybridge?

Should it propose development across the whole of its area?

Is more new development needed to deliver the objectives?

Does the plan unduly burden proposed development?

Is the town centre drawn too wide?

Is there enough evidence to support the plan?

# SHDC's main points

Comments	Response
<b>South Hams District Council</b>	
Support the initiative to prepare the plan and commend hard work ...	Welcomed
<b><i>... but raise various points of concern</i></b>	
More detail, more evidence and more development proposals required.	The plan aims to be clear and succinct. Overly detailed and technical content would not help most users.
Some sound aspirations but lacking detail how these will be achieved or evidence to support them.	SHDC sets the bar too high, asking for more than is required by NP Reg's.
Few development opportunities to enable aspirations and objectives to be delivered.	Add text to explain that delivery of the plan depends not only on its own policies but also those of existing and emerging development plans, which it takes into account and does not seek to constrain.
While neighbourhood plans need to be aspirational they also need to be realistic and deliverable.	

# SHDC's main points



Comments	Response
<b>South Hams District Council</b>	
<p>The plan does not take up the government's challenge to local communities to help shape growth and allocate land for housing.</p>	<p>The requirement is to deliver sustainable development, which the plan aims to help secure, particularly in the town centre.</p>
<p>The plan's scope in the context of an emerging strategic development plan could trigger an early review or prejudice the community's right to engage in shaping development through a neighbourhood plan.</p>	<p>The plan conforms with the strategic content of the adopted development plan and aims to engage with the emerging 'Our Plan'. It does not seek to prejudge, negate or constrain existing or emerging growth or development proposals.</p>
<p>Concern about the relationship between the plan and the adopted development plan (including the Ivybridge DPD of 2011) and the emerging 'Our Plan'</p>	<p>The community's right to engage is enhanced rather than compromised.</p> <p>Any need for future review of the plan will become clear as 'Our Plan' takes shape.</p>

# SHDC's main points

Comments	Response
<b>South Hams District Council</b>	
Need to build on the town's unique identity and assets to support the vision and objectives and reflect this in policy.	The plan aims to do this, guided by local views and aspirations. There may be scope to develop this more fully.
Some policies may unduly burden development, adversely impact viability and deliverability, and thus not contribute to the requirement to positively support development.	The plan's policies are challenging but not unduly onerous. They set out community aspirations for the town and should help to align development proposals with local objectives.
Some plan policies are not consistent with the Ivybridge DPD of 2011, for example in respect of land to the east of the River Erme.	Unclear where inconsistency lies, but any significant inconsistencies with the strategic content of the adopted development plan should be resolved.
Some policies may not be CIL compliant.	Unclear why.



# SHDC's main points

Comments	Response
<b>South Hams District Council</b>	
<p>The definition of the town centre does not accord with the NPPF and the existing development plan.</p>	<p>Reconsider extent of the defined town centre although it is considered that it does not fail to accord with the NPPF.</p>
<p>The policy which requires a traffic and transportation study is a concern.</p> <p>Travel should be looked at in an integrated way, and take account of public transport, including the railway.</p>	<p>The policy aims to enable the traffic issues of the town to be considered holistically and recommended measures brought forward in association with new developments.</p> <p>An integrated approach is required, and the plan will be amended to make this clear.</p>
<p>Policies for sport and leisure should reflect the South Hams Playing Pitch Strategy. The role of green infrastructure should be fully considered.</p>	<p>The latest work will be incorporated in the plan, including green infrastructure.</p>

# SHDC's main points



Comments	Response
<b>South Hams District Council</b>	
<p>The relationship between the objectives in the Plan and the policies which aim to deliver them.</p>	<p>Objectives were set by local focus groups. The plan will be amended to make this clearer, and to express these as aspirations. Measurable objectives will be derived from them to establish a firmer basis for policies.</p>
<p>The need for further evidence to justify many of the policy requirements.</p>	<p>It is hoped that SHDC can help to furnish evidence which they consider to be missing.</p>
<p>Some relevant sites lie in Ugborough but within the designated Ivybridge NP area.</p>	<p>The plan will clarify its extent in relation to the area within Ugborough parish.</p>
<p>Policies must be clear and precise if to be used in determining planning applications.</p> <p>SHDC would welcome the opportunity to discuss these comments and assist with the plan if this would be helpful.</p>	<p>SHDC's support to review, refresh and strengthen the plan and its policies will be welcomed.</p>

# Key consultees' main points



Comments	Response
<b>General</b>	
<b>DCC</b> welcomes involvement in the plan.	Welcomed.
<b>EA</b> welcome the plan's aspirations and objectives, in particular those relating to improving the town's focus on, access to and the health of the River Erme.	Welcomed.
<b>Hannick Homes</b> say that the plan should mention the Core Strategy and adopted DPD allocations with a map. .	Amend plan to refer to the major developments already proposed and add a map showing these for information.
<b>Gladman</b> sets out the statutory framework for neighbourhood planning, with their view of the plan and its shortcomings, and their view that it fails to meet the statutory requirements.	Views on the shortcomings of the plan and draft neighbourhood plan not accepted.

# Key consultees' main points

Comments	Response
<b>Vision and Objectives</b>	
<p><b>SHDC</b> make a variety of comments about the need to sharpen up objectives.</p>	<p>These suggestions will help to guide development of measurable objectives.</p>
<p><b>EA</b> recommend adding objectives to reduce flooding and to make the river corridor as natural as possible. Also show flood plain.</p> <p>The River Erme through Ivybridge is failing with regard to barriers to fish movements (e.g. weirs and other obstructions).</p>	<p>These will be good and sound additions to the plan.</p> <p>The plan will be amended to require that new developments should not damage but enhance the Ecological Status of the river.</p>
<p><b>Clinical Group</b> say the plan's objectives echo their vision of healthy people living healthy lives in healthy communities.</p>	<p>Alignment welcome.</p>
<p><b>Gladman</b> says the plan's vision is not growth oriented, and its objectives will consequently be undeliverable.</p>	<p>The vision responds strongly to the town's recent history and anticipated growth. Indeed, the plan is geared to that growth.</p>

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>Policy INP1 – Town Centre Regeneration</b>	
<i>Only SHDC comment directly on this policy.</i>	
The policy could be stronger.	Say more than “encourage and support”.
Concerned about the requirement that ‘all’ new development should contribute.	Town centre regeneration is prioritised so new development is required to contribute.
Developing brownfield sites is referred to in the objectives so should also be a proposal.	This is captured in this and other following policies, but will be made more explicit.
Suggest building a brand to promote Ivybridge and develop opportunities to attract more visitors and employers.	The plan aims to build the town's identity in line with the vision. Scope to further promote this through a 'brand' will be considered.
A widely drawn town centre could undermine the viability of the current retail area.	Amend plan to more clearly define the town centre shopping area.
Does “limit retail developments elsewhere” preclude small scale neighbourhood shops?	Clarify what is meant by limiting retail development elsewhere.

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>Policy INP2 – Town Centre land east of the River Erme</b>	
Only <b>SHDC</b> comment directly on this policy.	
The policy could be stronger.	Amend wording to provide more effective and clearer policy.
The policy is not consistent with the adopted development plan proposals for the area as it does not provide for any housing so would not enable delivery of the overall proposal.	The policy neither proposes nor precludes housing development.
It would be helpful to include a requirement for a masterplan to ensure delivery of a viable and comprehensive scheme.	Amend policy to include a requirement for a masterplan.

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>INP3 – Glanville's Mill site</b>	
Only <b>SHDC</b> comment directly on this policy.	
The policy could be stronger.	Amend wording to strengthen policy.
Clarify what is meant by 'improved shopping experience' and 'predominantly' retail use. Define primary shopping frontages.	These terms are considered to be self-explanatory, but more detail will be added.
Include a specified residential element to assist overall viability and deliverability.	The policy allows for and does not unduly constrain residential development.
Evidence needed to show the site should be redeveloped rather than improved.	Policy allows for redevelopment but also, should this not happen, enhancement.
New bridges should be justified and sites shown because of possible effects on SSSI.	To specify bridge crossing points would unduly constrain potential redevelopment.

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>INP4 – North of Fore Street</b>	
Only <b>SHDC</b> comment directly on this policy.	
The policy could be stronger.	Amend wording to strengthen policy.
Explain what qualitative assessment has been undertaken to justify policy.	Add explanation in supporting text.
Clarify ‘high design standard’, how much and what type of residential, and whether it will be a net gain.	High design standard is self-explanatory. Housing numbers do not need to be specified.
Provide details of what parking requirements are associated with redevelopment.	Normal adopted parking standards would apply.



# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>Policy INP5 – Community Facilities</b>	
<b>SHDC</b> say the policy could be stronger.	
<p>The list of community facilities will compete with SHDC's priorities. Some requirements may be unreasonable (eg. creative arts and dual use). Consider adding neighbourhood shops, improvements to parks, accessible natural spaces and allotments.</p>	<p>Consider issues raised and possible amendments to wording.</p> <p>Improved alignment between SHDC's and local priorities will be sought.</p>
<b>DCC</b> support promoting the library as a learning facility, improved youth facilities and increased dual use of school facilities.	Support welcomed.
<b>Gladman</b> say the policy is unreasonable, will adversely affect viability and fails to comply with government requirements.	It is understood that tests of fairness must be met. The plan helpfully sets out local aspirations, but viability is not set aside.

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>Policy INP6 – Housing and Employment</b>	
<p><b>SHDC</b> has (following a High Court decision) reverted to its higher affordable housing thresholds and says the plan should follow suit. Also says strengthen policy to require mixed use development, including employment, although this may adversely affect viability if applied to lower thresholds.</p> <p>Provide evidence to support the policy, clarify proportion of lifetime homes and how financial contributions will be calculated.</p>	<p>In general the policy deliberately avoids this level of detail, requiring only that other adopted plan's policies and latest government standards be at least met or, if possible, improved upon.</p>
<p><b>Gladman</b> say the plan cannot require that set government housing standards be exceeded.</p>	<p>The plan does not require this, but invites developers to consider doing better than the required minimum standard.</p>

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>INP7 – Traffic and Movement</b>	
<p><b>SHDC</b> says a study is not needed and that the policy predetermines the findings.</p> <p>Evidence is needed. Targets are unrealistic.</p> <p>It is assumed that sites already allocated are not included in the requirement.</p>	<p>Traffic is a priority concern. A study would enable a holistic view of possible solutions.</p> <p>Targets give something to aim for.</p> <p>The policy will apply to allocated sites which have yet to receive planning consent.</p>
<p><b>Highways England</b> say extensive junction improvements not warranted and Ivybridge not a priority for improvements.</p>	<p>Understood. However, the policy aims to enable a study of how to address existing and future traffic difficulties.</p>
<p><b>DCC</b> says that proposals are unaffordable and undeliverable. There may be scope for small scale walking, cycling and traffic management measures.</p>	<p>The plan avoids prescribed solutions which may be unrealistic. A study is proposed so that a holistic, viable and deliverable set of measures may be identified and progressed.</p>

# Main points on policies

Comments	Response
<b>Policies and Proposals</b>	
<b>INP8 – Historic and Natural Environment</b>	
<p><b>SHDC</b> says the plan should more fully set out what are the town's historic and natural assets, the policy should be made clearer in parts and offers some alternative wording.</p>	<p>The plan and policy can be amended and improved as SHDC suggests.</p>
<p><b>Natural England</b> welcomes the policy.</p>	<p>Support welcomed.</p>
<p><b>EA</b> welcomes the policy, and recommends added reference to the benefits of open spaces near watercourses.</p>	<p>Support welcomed. Add reference to open space benefits.</p>
<p><b>Gladman</b> says new developments can enhance green infrastructure and that the policy must be flexible to allow this.</p>	<p>Noted. No change required.</p>

# Main points on SA and monitoring

Comments	Response
<b>Strategic Environmental Assessment and Sustainability Appraisal</b>	
<p><b>Gladman</b> says that the LPA should determine whether the plan will require an SEA. This has not been carried out.</p> <p>The Scoping Report and Sustainability Appraisal has not been undertaken in accordance with the requirements.</p>	<p>A screening opinion has been sought from the LPA.</p> <p>These documents are at draft stage and will be developed further, including necessary consultations.</p>
<b>Monitoring</b>	
<p>Several respondents, particularly including <b>SHDC</b>, have referred to the need to monitor the effectiveness of the plan's policies.</p>	<p>A simple monitoring framework will be developed for the plan.</p>

# Summary of main points



- Does the plan comply with government regulations?
- Does it conform with the strategic development plan?
- Is the vision sufficiently unique to Ivybridge?
- Should it propose development across the whole of its area?
- Is more new development needed to deliver the objectives?
- Does the plan unduly burden proposed development?
- Is the town centre drawn too wide?
- Is there enough evidence to support the plan?

# Reminder of basic conditions for neighbourhood plans



A neighbourhood plan must meet some basic conditions:

1. It must be **appropriate** having regard to national policy
2. It must contribute to the achievement of **sustainable development**
3. It must be in **general conformity** with the strategic policies of the development plan for the area
4. It must be compatible with **human rights** requirements and **EU obligations**

# Responding to main points

1. Does the plan comply with government regulations?

*Review compliance with support from SHDC (and any remaining Planning Aid support).*

2. Does it conform with the strategic development plan?

*Review conformity in discussion with SHDC.*

3. Is the vision sufficiently unique to Ivybridge?

*Consider scope to sharpen the vision and create a brand. **Is this a Steering group task or should focus groups be reconvened?***



# The Vision for Ivybridge



**Ivybridge**

**A friendly mill town**

**– along the river, beside the moor –**

**offering the opportunity**

**for healthy, creative and sustainable lifestyles**

# Responding to main points

4. Should the plan propose development across the whole of its area?

*The Ivybridge plan's focus is the town centre which is seen as the priority area for attention. Some sites on the town's periphery are already decided. Further growth is likely but is left for other plans to deal with. Indeed, it seems likely that much of that would in any case have to be outside the plan's area.*

*Proposing more sites may give the local community more say about how much development takes place and where, but it also raises the stakes and makes the process more challenging.*

***Is the town centre focus still the right course to follow?***

# Responding to main points

5. Is more new development needed to deliver the objectives?

*The plan's objectives are those set by the focus groups. They are aspirational and it is suggested that the plan makes this clearer and that a sharper and more realistic set of objectives be derived from them.*

*This may be seen as a choice between much more development (to deliver the aspirations) or more realistic objectives (more likely to be deliverable from the plan's town-centre focused proposals).*

***Who should draw up the new objectives?***

# Responding to main points

## 6. Does the plan unduly burden proposed development?

*Objectors say that viability is fundamentally undermined when the plan's policy requirements are added to existing adopted policies.*

*Already developments must (as well as meeting their own needs) provide for or contribute towards other wider needs, particularly affordable homes, open space, sport and recreation.*

*The plan's policies aim to set out local aspirations so that these can help to guide decisions about scarce resources whilst not placing absolute requirements against developments.*

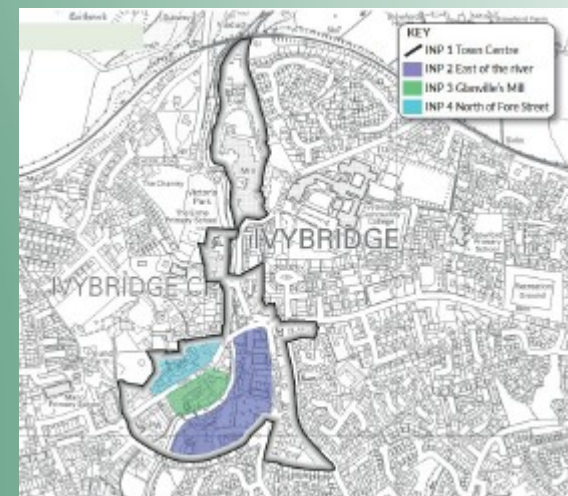
*Review the plan's policies with support from SHDC (and any remaining Planning Aid support).*

# Responding to main points

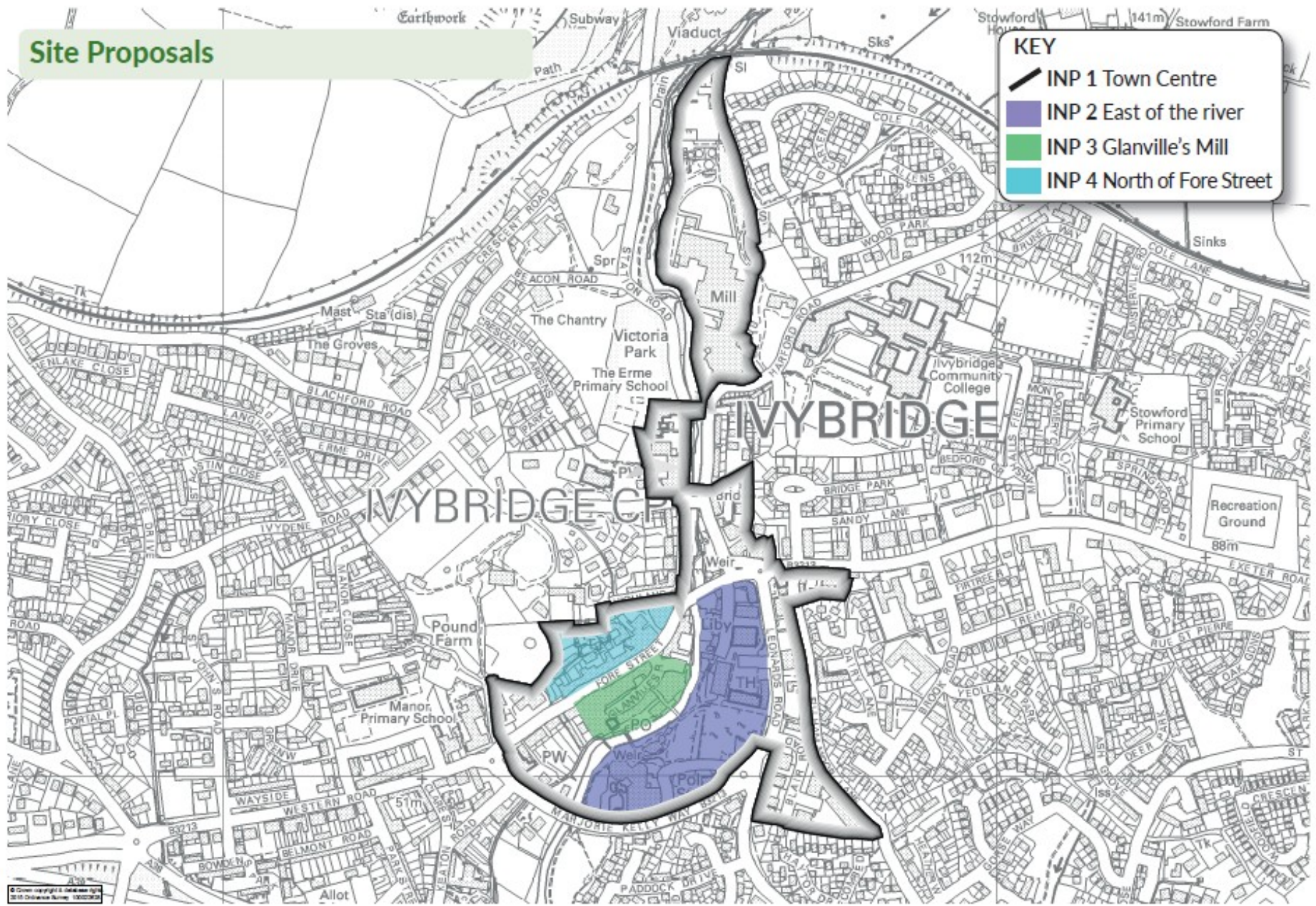
## 7. Is the town centre drawn too wide?

*The town centre boundary is drawn wide (including Stowford Mill in the north and the Methodist Church in the south west). The aim is regeneration through redevelopments and improvements, many of which are likely to be predominantly retail.*

***Should the town centre boundary be drawn tighter to focus investment?  
If so, who should redraw it?***



# Site Proposals



# Responding to main points

8. Is there enough evidence to support the plan?

*This concern relates to the fact that aspects of the plan's policies are highly aspirational, and again primarily relates to viability.*

***Should new evidence be gathered or can we rely on existing evidence elsewhere?***

# What happens next?



- Comments received are drawn together in a report
- Make any **amendments** in response to consultation
- Complete supporting documents
- **Submit** the plan to South Hams District Council
- Independent **examination**
- Public **referendum**
- The plan is **adopted** as part of the development plan and used to guide **planning decisions** in Ivybridge



# Neighbourhood Plan Process

## Getting Started

Clarify why a plan is needed.  
Publicise the intention to produce a plan.  
Identify and contact key local partners.  
Dialogue with the local planning authority.  
Produce a project plan with costings.

## Neighbourhood Area

Determine the neighbourhood area.  
Submit neighbourhood area proposal.  
LPA consults.\*  
LPA approve.

## Neighbourhood Forum

Put together prospective neighbourhood forum.  
Submit forum proposal.  
LPA consults.\*  
LPA determines area.

## Community Engagement & Involvement

Publicity.  
Engage local partners.  
Initial community engagement (broad issues).  
Provide feedback.  
Ongoing community engagement (aims, content, detail).

## Building the Evidence Base

Review existing evidence.  
Identify gaps in evidence.  
Compile new evidence.  
Analysis of evidence.

## Themes, Aims, Vision, Options

Identify key issues and themes.  
Prioritise issues and themes.  
Develop key aims.  
Look at options.

## Writing the Plan

Policies, proposals, site allocations.  
Consider sustainability, diversity,  
equality, delivery.

## Consultation

Consultation on plan.\*  
Amend plan.

## Submission

Submit to LPA.  
LPA publicises.\*

## Independent Examination

LPA appoints examiner.  
Examination takes place.  
Examiner's Report.

## Referendum

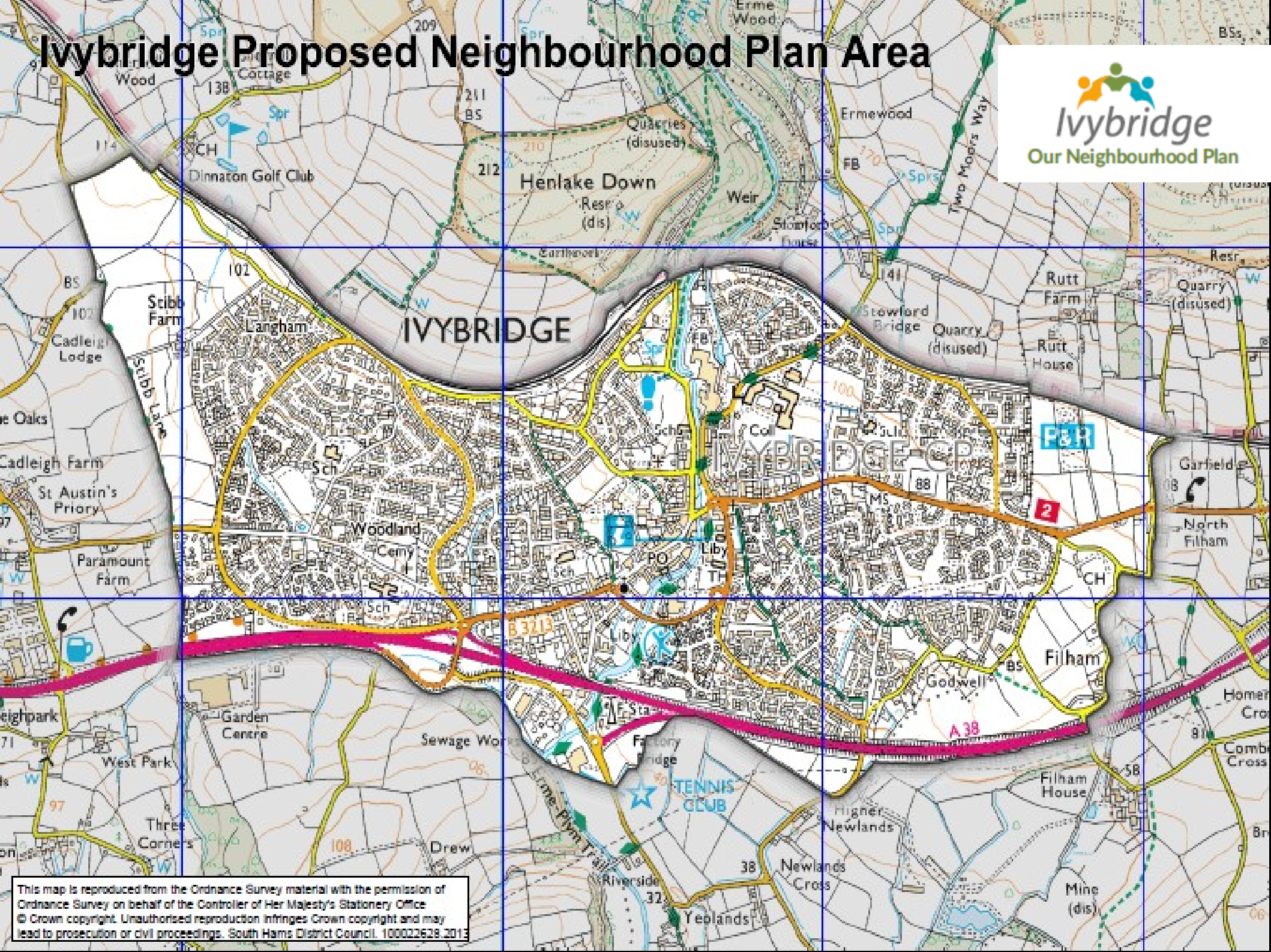
Publicise referendum.\*\*  
Referendum.

The plan  
is made

\* Minimum time - 6 weeks

\*\* Minimum time - 25 working days

# Ivybridge Proposed Neighbourhood Plan Area



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