

DRAFT IVYBRIDGE NEIGHBOURHOOD PLAN – RESPONSE REPORT

Policy / para no	Name	Rep' no	Summary of Comment (original available for inspection)	Response
General comments				
General	South Hams District Council		The LPA fully supports the initiative to produce a Neighbourhood Plan and recognises the extent of work and community involvement undertaken, commending the group for all the hard work already put into the plan.	Support welcomed.
			The scope of a neighbourhood plan depends on a number of factors. These include what is already covered in the development plan and its status, the expected level of future growth for the area, the key issues for the community, what they wish to engage with and their preferred outcomes. It can be detailed, including allocating land for future growth, set general principles for development or focus on a few key issues.	The plan will be amended to make its relationship to existing and emerging plans clearer, with reference made to what is known about the anticipated level of future growth.
			The LPA notes the plan's focus on the town centre. It suggests that the plan should state that this focus is not intended to undermine the existing local plan or the need to plan for growth to meet future needs.	The plan will be amended to make it clear that the focus on the town centre does not aim to undermine the existing adopted plan or the need to plan for growth to meet future needs.
			The community may wish to engage with future growth through a review of the neighbourhood plan or by alternative mechanisms the LPA may put in place as it prepares Our Plan.	Any need to review the plan will become clearer as Our Plan is progressed. Meanwhile, the local community wish to progress the neighbourhood plan without delay in order to address the priority needs of the town centre.

General	South Hams District Council		The LPA has made a number of suggestions for further consideration prior to submission of the draft plan to help ensure its success at examination. The plan contains sound aspirations but lacks detail as to how they will be achieved, evidence to support them or development opportunities to enable their delivery. The plan must be realistic and deliverable.	The need for a realistic and deliverable plan is agreed and the LPA's support in attaining this is welcomed.
			<p>The main areas of concern are:</p> <ol style="list-style-type: none"> 1. The plan does not take up the government's challenge to local communities to help shape growth and allocate land for housing. 	1. It is not a requirement that land be allocated for housing but that sustainable development be delivered. It will be made clear that the plan does not aim to constrain growth but that its focus is the regeneration of the town centre.
			<ol style="list-style-type: none"> 2. The scope of the plan in the context of an emerging local strategic development plan with a similar plan period. This could trigger an early review and/or prejudice the community's right to engage in shaping future development through a neighbourhood plan 	2. The relationship with Our Plan will be clarified in light of progress made and information available at the time.
			<ol style="list-style-type: none"> 3. The relationship between the Draft INP and the adopted development plan for the South Hams, including the Ivybridge DPD (Feb 2011) and emerging Our Plan 	3. The relationship to the adopted development plan will also be clarified.
			<ol style="list-style-type: none"> 4. The need to look at ways to build on the town's unique identity and assets to support the Draft INP vision and objectives and reflect this in policy 	4. The vision and objectives have been shaped by the community and it will be important not to fundamentally change them. Ways to strengthen their purpose and delivery in policy will be explored.

General	South Hams District Council		5. The definition of the town centre does not accord with the National Planning Policy Framework (NPPF) and the existing development plan	5. The defined extent of the town centre will be re-examined.
			6. The relationship between the neighbourhood plan and the Ivybridge DPD (Feb 2011) where policy is not consistent, for example in respect of land to the east of the River Erme.	6. The plan will be brought in line with the adopted DPD.
			7. The lack of development proposals and opportunities to deliver the NP policies	7/8. The plan identifies a range of development opportunities in the town centre and these, in combination with developments proposed elsewhere in the town, will enable policy delivery.
			8. Whether the NP policies are viable, deliverable and achievable.	
			9. Some overly restrictive policies may not contribute to the requirement for neighbourhood plans to positively support local development	9/10/11. It is not intended that policies be overly restrictive so that local development is not supported; nor that they be non-CIL-compliant. This will be carefully considered and any necessary amendments made to try to ensure that development, investment and regeneration can proceed.
			10. Policy requirements could place undue burden on development and impact on the viability and deliverability of housing, including sites allocated in the Ivybridge DPD (Feb 2011).	
			11. Policies may not be CIL compliant	
			12. The need for further evidence to justify many of the policy requirements	12. It is hoped SHDC can help to identify appropriate evidence to support the plan's policies, also bearing in mind that the views and involvement of the local community are a very important element of the plan's evidence.

General	South Hams District Council		13. The inclusion of a policy which requires a traffic and transportation study	13/14. The traffic and transport issues faced in Ivybridge are long-standing and well-known. It is considered that a holistic long-term study is an appropriate way to enable a long-term strategy to be put in place to address them.	
			14. The need to look at travel in an integrated way, and to take account of public transport, including the railway, to build opportunities for Ivybridge		
			15. The need to ensure that policies for sport and leisure reflect the South Hams Playing Pitch Strategy		15/16. It is hoped that the LPA can assist in ensuring that the plan fully reflects the South Hams Playing Pitch Strategy and embraces the role of green infrastructure.
			16. The need to fully consider the role of green infrastructure		
			17. The relationship between the objectives in the Plan and the policies which take these forward to deliver these objectives; and		The relationship between objectives and policies will be explained further.
			18. The need for clear and precise policies to ensure they are effective and can be used by a decision maker determining planning applications.		The LPA's support in producing effective policies will be welcomed.
			The LPA would welcome the opportunity to discuss their comments and further assist with the draft plan if this would be helpful.		
General	Devon County Council		As a main infrastructure provider the County Council has a key role in ensuring development proposals come forward in a sustainable manner and welcomes the opportunity to be involved in the production of the Neighbourhood Plan.	The County Council's continued involvement in progressing the plan is welcomed. Indeed, a further meeting has already taken place.	
General	Environment Agency		Welcome the aspirations and objectives set out in the Plan, in particular those relating to improving the town's focus on, the access to and the health of the River Erme. Also provide advice and recommendations (below) to strengthen the plan from an environmental perspective.	Support and advice welcomed.	

General	South West Water		No specific comments but feel free to consult us on any particular concerns going forward.	Comments welcomed.
General	Northern, Eastern and Western Devon Clinical Commissioning Group		We have sent your original email to NHS England, requesting that they correspond separately. Their Area Team contract with GP practices for core primary medical services and GP premises and therefore they will be interested to read of your plans to create a health and leisure hub incorporating new leisure and medical centres.	The NHS Area Team's views and engagement in delivering the plan will be welcomed.
General	Hannick Homes		<p>South Hams Core Strategy and the adopted Ivybridge Site Allocations DPD set out requirements for new housing and employment and allocate sites to meet these requirements in Ivybridge. In setting out a vision for the future of the town, the plan should make mention of these allocations.</p> <p>Suggested change: In Section 2 (Ivybridge Context) add text referring to Proposal I1 of the DPD and add a plan of the town showing the location of the proposal.</p>	<p>Although the plan “focuses first and foremost on the town centre with the aim of encouraging and enabling investment and regeneration at the heart of Ivybridge” (para 4.1) it is agreed that reference to the major developments already proposed would be helpful.</p> <p>The plan will be amended accordingly, including a map to show the extent of the town's projected growth for information purposes.</p>
General	Gladman		Gladman set out a lengthy exposition of the statutory framework for neighbourhood planning, a commentary on their view of the local development plan and its shortcomings, and a view that the neighbourhood plan fails to meet the statutory requirements, as set out in more detail below.	<p>Commentary noted.</p> <p>Views on the shortcomings of the local development plan and draft neighbourhood plan not accepted, for reasons set out in response to detailed comments below.</p>

Foreword				
Foreword	South Hams District Council		For transparency, explain that the draft plan has been prepared by Lee Bray (MRTPI) on behalf of the INPG.	The consultant's role will be referred to, although not necessarily in the Foreword.
			Clarify that the INP will be used, alongside local and national planning policy, to help determine planning applications.	Para 6 will be expanded to refer more explicitly to the plan's role in helping determine planning applications.
Introduction				
Introduction	South Hams District Council		Explain the plan's town centre focus and that it does not cover future housing growth and employment. Clearly state that it neither constrains development proposed in the adopted local plan nor restrains future growth to meet the development needs of the area.	Para 1.4 clearly states the plan's focus on the town centre. Additional wording will be added to explain that it does not seek to undermine or constrain existing or future planned growth.
			Refer to local strategic context with adopted local plan to 2016 and preparation of a new plan with a horizon to 2031 or later.	The relationship to the current and emerging local plans will be made clear although, since there is as yet little public detail of the new plan's content it has been impossible to engage with it as effectively as had been hoped.
			It would add clarity to explain how the document is set out. (beginning with the local context; then aspirations and objectives, which form the basis for the detailed planning policies which follow.)	Although the contents page sets out the document structure, text will be added to further explain how the plan is set out.
			A neighbourhood plan can focus on a small number of local concerns or provide policies across a wide range of issues. Local people decide what should be included. A NP area can extend beyond a parish boundary so long as it is included in the designated area.	The plan's town centre focus is what local people identified as the priority, concentrating on the priority issues that remain unresolved.

Introduction	South Hams District Council		It would be helpful to explain the role of the neighbourhood plan in the statutory planning framework. This would explain that when the preparation process is completed the INP will form part of the statutory development plan for the District, alongside the local plan (Our Plan) and national planning policy.	This is explained in the plan (at para 6 of the Foreword, and at para 1.2). The aim has been to keep the plan clear, succinct and user-friendly – not unnecessarily weighed down with technicalities.
Paragraph1.2			The regulations refer to an ‘independent’ examination rather than a ‘public’ examination.	Change word ‘public’ to ‘independent’ examination.
Paragraph1.3			This paragraph could be strengthened to better explain the purpose of the plan and what it is trying to achieve.	This is explained elsewhere. The aim is to keep the plan clear and succinct. No change.
Ivybridge NP Area map			Plan area must be clear.	Strengthen boundary edge on the map.
Para 1.4			It is important to be clear about the neighbourhood plan area, which includes a part of Ugborough parish.	Amend plan (mapping and text) to make this clearer. Also refer to the Ugborough Neighbourhood Plan
Para 1.6			Explain how community and stakeholders have been involved. Explain that more information about this is set out in the Statement of Consultation.	Amend para 1.6 accordingly.
Paras 1.10 & 1.11			Clarify information about the process of preparing neighbourhood plans and the key stages involved. Provide further detail to explain submission to LPA, formal consultation, examination and referendum etc.	Amend plan and include flow diagram.
Para 1.13			Clarify examination of neighbourhood plans.	Change word ‘public’ to ‘independent examination’
Para 1.13			Neighbourhood Plans help shape development in an area but It is unrealistic to give the impression that the plan alone will guide and manage development in the town.	The text says that the plan will “help” make planning decisions. However, more can be added to emphasise that it will only be one part of the development plan.

Paragraph1.14	South Hams District Council		The LPA welcomes alignment of the NP with the plan period for 'Our Plan'. However, the 'Our Plan' period is under review and it would be helpful if the INP could reflect this (once agreed).	Update plan period to reflect revised 'Our Plan' plan period once it has been agreed by the LPA.
Page 7			Great photographs giving a real feel for the process. It would be interesting to add references?	Add captions.
Section 2: Ivybridge in Context				
General comment	South Hams District Council		Local context should include the local planning context (Ivybridge DPD Feb' 2011, saved policies from the 1996 Local Plan, the emerging Our Plan and relevant evidence).	Add section about the planning context. This will be included in the introduction.
General comment			The evidence base schedule does not include reference to ecology or heritage designations. The plan should refer to relevant designations (e.g. SSSI, conservation area, listed buildings, etc).	Include ecology and heritage related evidence and add reference to designations and their sensitivities.
Para 2.5			Use up to date evidence.	Amend plan to add reference to 2011 census and latest ONS figures.
Para 2.6			Include reference to all forms of transport – including the main line railway, bus services and cycling/walking.	The railway is referred to in para 2.4. This chapter aims to paint a broad picture only. No change.
Para 2.8			Reference is made to 'a successful school'. Clarify if this means the secondary school and refer to its specialist sports status to qualify success.	Specify "a school with specialism in sports, sciences and languages" to add clarity and bring the plan up to date.
Para 2.10			Be more specific about the changes to help secure the town's future. Reiterate the plan's town centre focus.	Amend plan accordingly.
Section 3: Vision and Objectives				
General	South Hams District Council		These objectives are supported in principle. However, the links to evidence need to be strengthened to provide a robust basis for the policies which follow.	The objectives are those set down by local focus groups. The plan will be expanded to clarify this as their

				basis in evidence.
General	South Hams District Council		SHDC makes many points (below) concerning the NP objectives, raising varied concerns.	<p>The objectives are aspirations set down by local focus groups. The plan will be amended to more fully explain this.</p> <p>The community's aspirations will be used as the basis for a new set of objectives expressed to help show how the policies have been shaped, and better able to be measured and monitored.</p> <p>Suggestions made by SHDC will also be incorporated where they align with the community's set objectives.</p>
Transport & Movement Objectives			Should include reference to the railway. The railway does not feature on the 'Transportation' map (page 20).	Add reference to the railway in set objectives. Include railway on Transportation map.
			It is important to quantify what 'much more' cycling and walking and 'many fewer' car journey's means.	Add reference to a shift in travel patterns in favour of non-car modes as part of the plan's monitoring framework.
			Although the key issues identified for the transportation study may reflect community views, it is important to provide evidence that these are the key issues for transport in the town. A transportation study could identify the key issues and make recommendations about how to address them.	Community views are key evidence. However, the suggestion that a study should aim to identify key issues is helpful and the plan will be amended accordingly.
			Include 'an integrated travel plan' as a key issue for a	This is helpful and the plan will be

			transportation study to consider (including reference to bus and rail links).	amended accordingly.
Transport & Movement Objectives	South Hams District Council		Include objective about how to build on opportunities for tourism and increasing local visitors to town based on travel links, including bus and rail.	This is helpful and the plan will be amended accordingly.
Sport & Leisure Objectives			These establish some good principles around the promotion of sport and leisure, but could also include; <ul style="list-style-type: none"> • Parks and accessible natural spaces (e.g. nature reserves, community orchards, accessible woodlands) • Public rights of way, permissive paths and unclassified county roads to promote access to the surrounding countryside and moor. 	This is helpful and the plan will be amended accordingly.
			South Hams are preparing a template to help towns and parishes prepare Open Space, Sport and Recreation Plans. This could inform and provide evidence for the plan.	Ivybridge Town Council are already working closely with SHDC on these matters and will continue to do so.
SLT Objective 1			It is important to be able to measure these objectives.	Develop a monitoring framework for the plan.
SLT Objective 2			The reference to catering for any talent or chosen sport or activity is ambitious. There is no indication of how this could be achieved. Rewrite with a more realistic and achievable objective.	This is the objective set by the community. It will now sit with the list of community aspirations (see above).
SLT Objective 3			Is the reference to 'teens' and 'elderly' appropriate? Is there evidence that these groups are particularly in need of facilities and opportunities? Have these groups been consulted? What about other groups such as disabled people, young Mums etc	Amend to refer to 'younger and older people' . Local knowledge and expressed views support these as priority needs.

SLT Objectives 4 and 5			Reference to facilities should reflect the SH OSSR and Playing Pitch Strategy (PPS).	The plan will reflect SHDC's PPS. The PPS should also seek to reflect the neighbourhood plan.
SLT Objective 5	South Hams District Council		Explain what is meant by dual use of school pitches and which facilities are referred to and provide evidence to support this. Should the objective refer to exploring opportunities to increase dual use? Consider adding reference to the school's policy, aspirations and plans.	The term 'dual use' is well understood. This objective is supported by DCC. It aims to do more than just explore opportunities. Reference to the school's future plans will be added.
SLT Objective 6			Add an adjective to this adjective, such as 'Support any proposal for visitor accommodation ...'	Add the words 'Promote more' to the start of the objective.
SLT Objective 7			Clarify which cycle routes this refers to and consider promoting links to railway. Cycle routes do not feature on the 'Transportation' map (page 20). Consider adding an objective specific to the National Cycle Network.	The objective relates to all cycle routes. Add cycle routes to the Transportation map. Add reference to the NCN.
Employment Objectives			Emphasis on marketing and IT could narrow employment opportunities and the objective lacks explanation to support why these particular areas are desired. Provide evidence to show that such jobs could be achieved, would meet the local skills profile and be right for Ivybridge.	This locally set objective reflects the town's aspiration to grow as an investment, visitor and shopping choice, and to foster sustainable lifestyles.
			It is unrealistic and undesirable to seek that all new housing sites include employment and office space. There is no consideration of the size of site, characteristics or viability. Evidence is lacking.	This objective reflects the mixed use objectives of the adopted development plan. Reference to site size will be added.
Shopping and the Town Centre Objectives			Define the town centre area and clarify if this refers to enhancements in the public realm or includes other areas? A definition of the town centre based on the Site Proposals map (page 16) is not compliant with the NPPF (para.23 refers to the definition of 'the extent town	The plan shows the area within which policy INP1 applies. The objective as set by the community does not specify public realm only.

			centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres'). Neither does it comply with saved policy SHDC23 of the 1996 adopted local plan. There appears to be no justification to include the area to the north which includes Stowford Mill.	It is unclear why SHDC considers this not to be compliant with the NPPF. The inclusion of the area to the north is the community's wish, but this will be carefully re-examined.
Shopping and the Town Centre Objectives	South Hams District Council		Perhaps 'create opportunities' would better reflect the objective to increase evening trade (restaurants etc)	This is helpful and the plan will be amended accordingly.
			Glanvilles Mill is in private ownership and it would be more realistic and achievable to use the word 'support proposals to redevelop'.	This is helpful and the plan will be amended accordingly.
			The reference to the holistic redevelopment of Butterpark and Sportsmans Inn sites is not taken forward in the NP policies so this objective cannot be delivered.	This is helpful and the plan will be amended.
Community Objectives			The reference to public art is vague, raises issues of viability and cannot take precedence over SHDC's agreed approach to seeking contributions . Amend to 'promoting 'public art and 'encouraging' its inclusion in developments or "support community initiatives to promote public art".	This is helpful and will help to shape the new objectives.
Environment Objectives			These objectives are supported. Clarify that they aim to protect and enhance the natural and built environment.	This is helpful and the plan will be amended accordingly.
			The evidence base does not include reference to ecology and heritage to support elements of this objective.	Add appropriate evidence.
			The Devon Landscape Policy Group guide for neighbourhood plans includes the use of Landscape Character Assessments in NP's.	This is not a priority issue for the plan. The SHDC LCA will be sufficient.

Environment Objectives bullet point 1			Does this refer only to the open spaces shown in the 'Historic and Natural Environment' map? Some open spaces shown on the map conflict with proposal I1 in the Site Allocations DPD (Feb 2011) or with future development or infrastructure such as the link road. The NPPF seeks to 'conserve and enhance' the natural and built environment and the NP should reflect this.	The link to the map will be made clearer. Potential conflicts with needed development and infrastructure will be removed. The objectives are considered to reflect NPPF guidance.
Environment Objectives bullet point 2	South Hams District Council		To add weight refer to biodiversity in general. If there is a particular reason to refer specifically to woodland biodiversity provide reasoned justification.	Amend wording to read conserve and enhance biodiversity, including woodland biodiversity.
Environment Objectives bullet point 3			It may be unrealistic to have an objective to 'reduce' pollution.	Amend wording to say 'Support measures to help reduce pollution'.
Environment Objectives bullet point 4			Further clarification of the objective to 'protect and invest in the Ivybridge Conservation Area would be helpful. What would investment be used to achieve?	The objective is generic. Overly specific detail would limit it unnecessarily.
Environment Objectives bullet point 5			Reflect NPPF and refer to 'conserve and enhance' historic features and natural resources.	Amend wording to reflect NPPF.
Environment Objectives			Opportunities should be considered to recreate habitats and establish linkages between distinct areas of habitat in the town centre and other areas with the INP area.	Consider ways to increase biodiversity and promote green infrastructure.
			There would be merit in referring to green infrastructure. The South Hams Green Infrastructure Framework has themes covering: <ul style="list-style-type: none"> • Access, Health and Recreation • Biodiversity, Landscape and Heritage • Sustainable drainage, flood alleviation and water 	Add reference to the role of green infrastructure in NP objectives.

			<p>quality, and</p> <ul style="list-style-type: none"> Local food and fuel. 	
General			SHDC raises the need to be able to monitor the effectiveness not only of the policies but also the objectives of the plan.	A monitoring framework will be prepared, related to the plan's objectives and policies, to enable its effectiveness to be monitored.
Vision and Objectives	Environment Agency		<p>Improving the town's relationship with and enhancing the River Erme are central to many of the objectives set out in the plan.</p> <p>Welcome the Environment objectives in respect of green space, biodiversity and reducing pollution in the River Erme. However, we also recommend the inclusion of an objective relating to reducing the risks or consequences of flooding.</p> <p>We would also recommend that the river corridor should be made as natural as possible and would be happy to discuss any opportunities for environmental enhancement along the River Erme Corridor.</p> <p>With regard to the objectives of the Water Framework Directive the River Erme through Ivybridge is at Moderate Ecological Status. It is failing with regard to barriers to fish movements (e.g. weirs and other obstructions). The target is to meet Good Ecological Status by 2027. Therefore, any new developments must not cause deterioration and the Plan should seek opportunities for improvements.</p>	<p>Agreed.</p> <p>This will be a good and sound addition to the plan.</p> <p>Agreed, and a meeting will be arranged to explore this further.</p> <p>The monitoring framework will include reference to this target and the plan will be amended to state that new developments should not damage but enhance the Ecological Status of the river.</p>
General	Northern, Eastern and Western Devon Clinical Commissionin		Recently published four commissioning strategies which apply to health and care services. These embrace the vision set out in the draft NP to build a town that promotes a healthy, creative and sustainable lifestyle. The plan's objectives also echo our vision of healthy people	The CCG's strategies' alignment with the plan is noted and welcomed. Shared vision and objectives will assist partnership

	g Group		living healthy lives in healthy communities.	working.
Vision and Objectives	Gladman		The plan's vision is limited, insufficiently growth oriented, and its objectives will consequently be undeliverable.	The plan's vision is that of the local community. It responds strongly and appropriately to the town's recent history and anticipated future growth. Indeed, it is precisely that growth to which the plan is geared. No change.
Section 4: Policies and Proposals				
Paragraph 4.1	South Hams District Council		Clarify that the Plan neither deals with nor aims to constrain current or future housing allocations.	Clarify this point in the plan.
Paragraph 4.2			Does the second sentence refer to outside the town's administrative boundary or outside the plan area? A neighbourhood plan can only make proposals within its plan area but can contain policies seeking contributions from future development to support needed facilities and infrastructure.	Clarify that this means facilities and infrastructure outside both the town and plan area but directly linked to meeting the needs of Ivybridge.
Paragraph 4.4 – bullet point 1			The Council is supportive of the aim to redevelop the land east of the River Erme so long as proposals support and are not in conflict with the Ivybridge Site Allocation DPD (Feb 2011) and the current Health and Wellbeing Partnership proposals for the area, both of which include residential development.	The NP neither proposes nor precludes residential development in this area.
Paragraph 4.4 –			Glanville's Mill is in private ownership. This reflects the	The plan aims to improve the area's

bullet point 2			community's aspiration to improve its appearance.	"shopping offer, pedestrian facilities, appearance and success".
Paragraph 4.4 – bullet point 4			Any new bridges to promote movement around the River Erme should be well linked, safe and accessible for all.	Add reference to accessibility.
Para 4.4	Hannick Homes		<p>Para 4.4 of the plan refers to a proposed new medical centre on land to the east of the River Erme. A planning application submitted by our client on land to the east of the town which forms part of adopted DPD Proposal I1, and which is currently being considered by South Hams District Council, includes a site for a new medical centre. The Plan should acknowledge this proposal as a significant community facility serving the town and hinterland.</p> <p>Suggested change: Add a reference in Section 4 to the medical centre proposal as part of the I1 allocation.</p>	<p>The need for a new medical centre in Ivybridge is not in dispute and discussions are continuing regarding its location.</p> <p>Progress with the application relating to DPD proposal I1 will be monitored and the plan will refer to the latest situation at the time of publication.</p>
Paragraph 4.5	South Hams District Council		<p>The definition of the town centre and reference to the growing retail footprint could undermine the viability of the retail shopping area currently focused on Fore Street, Glanville's Mill and east of the river.</p> <p>Is it intended that the words "limit retail developments elsewhere" should preclude small scale neighbourhood shops in new developments?</p>	<p>Amend plan to more clearly define the town centre shopping area.</p> <p>Clarify what is meant by limiting retail development elsewhere.</p>
Paragraph 4.6			<p>Define what is meant by 'all kinds of development'. Does it meet CIL tests and S106 of The Town and Country Planning Act 1990.</p> <p>A further initiative for Ivybridge could be building an identity for the town (a brand) and developing the opportunities Ivybridge has for attracting more visitors and potential employers.</p>	<p>Make any amendments needed to ensure CIL compliance.</p> <p>The plan aims to raise the town's profile by building its identity in line with the vision. Scope to further promote this through a 'brand' will</p>

				be considered.
Policy INP1: Town Centre Regeneration	South Hams District Council		<p>2. This policy is critical to supporting the aims of the NP and should be clear and direct. SHDC considers that it could be strengthened and more proactive but questions whether the reversal of traffic flow is strictly a planning issue.</p> <p>3. The Site Proposals Map should be referred to in policy.</p> <p>4. Consider revising town centre area to that shown in the adopted local plan.</p> <p>5. SHDC has concerns about the requirement that 'all' new development should make a contribution. The phrase 'new development' needs refining. The LPA also questions whether clause INP d) would be better included in Policy INP5: Community Faculties.</p> <p>6. Given that developing various brownfield sites are referred to in 'Shopping and the Town Centre Objectives' and this is a planning issue, should this not follow through as a proposal?</p> <p>7. Consider adding a bullet point to INP1 d) for improved provision of open space, sports and recreation facilities</p> <p>8. Link Policy to Site Proposals Map</p> <p>POINTS RAISED AT A MEETING ON 7th APRIL 2016</p> <p>9. No need to refer to changes of use since these are also a form of development.</p> <p>19. Consider adding a further item to the list to cover any other necessary infrastructure of facilities that</p>	<p>Amend text to strengthen the policy (to say more than encourage and support).</p> <p>Refer to Proposals Map in policy.</p> <p>The extent of the town centre area will be considered carefully.</p> <p>The plan aims to prioritise town centre regeneration and accordingly seeks contributions from new development across the plan area. This will be clarified.</p> <p>This aspiration is captured in this and following policies, but will be made more explicit.</p> <p>Open space, sport and recreation is better dealt with in the relevant policy.</p> <p>Link will be made clear.</p> <p>Agreed. Delete "and changes of use".</p> <p>Agreed in principle. Add wording so that the policy will say "New</p>

			might be reasonably required to support the development.	development in Ivybridge should, in addition to the provision of requirements necessary to support the development itself, contribute to initiatives which support the town centre's regeneration. These might include”.
Policy INP2:Town Centre land east of the River Erme	South Hams District Council		<ol style="list-style-type: none"> The policy could be strengthened by alternative wording such as: <ul style="list-style-type: none"> <i>The area is proposed for mixed use redevelopment to include:</i> <ul style="list-style-type: none"> <i>a health and leisure hub</i> <i>a hotel and restaurant</i> <i>retail and office development and so on.</i> <i>Development will be required to provide for:</i> <ul style="list-style-type: none"> <i>high quality design solutions</i> <i>a safe and attractive environment etc</i> <i>improved access etc</i> <i>and no loss of car parking <u>capacity</u>.</i> The policy is not consistent with the adopted development plan and the current ‘Health and Wellbeing Partnership’ proposals for the area as it does not provide for any residential and the Draft INP does not propose any development to enable delivery of the overall proposal. It would also be helpful to include a requirement for a masterplan for the area to ensure delivery of a viable and comprehensive scheme. 	<p>Amend wording to provide more effective and clearer policy.</p> <p>Add the word capacity to no car parking loss.</p> <p>Consider how any such scheme would be funded so the policy requirements are deliverable and achievable.</p> <p>The policy neither proposes nor precludes housing development.</p> <p>Amend to include a requirement for a masterplan.</p>
Policy INP3: Glanville’s Mill	South Hams District Council		<ol style="list-style-type: none"> This policy could be strengthened by alternative wording such as; 	Amend policy and supporting text accordingly.

<p>Site</p>			<ul style="list-style-type: none"> • <i>Redevelopment and enhancement of Glanville’s Mill is proposed for the following mixed uses:</i> • <i>Development will be required to provide for (list as shown in the draft NP)</i> <ol style="list-style-type: none"> 2. Clarify what is meant by ‘an improved shopping experience’ and ‘predominantly’ retail use. Define primary shopping frontages. 3. The inclusion of a specified residential element should be considered in order to assist overall viability and deliverability. 4. Evidence should be provide to indicate that the site should be redeveloped rather than improved or clarity given about the development options for the site. 5. The potential impact of new bridges over the River Erme may have implications on the SSSI downstream. Bridge sites should be identified in order to assess this potential impact. Although the LPA supports the community wish to enhance this area no evidence has been supplied to justify a new river crossing in terms of the benefits that will be derived, as against the potential impact on the SSI and the viability of the policy. 	<p>The policy will be sharpened and simplified to enhance its meaning and clarity.</p> <p>The policy allows for and does not unduly constrain residential development on the site.</p> <p>The policy allows for the site's redevelopment but, should this not take place, also its enhancement.</p> <p>To specify bridge crossing points in the plan would unnecessarily constrain possible redevelopment options.</p>
<p>INP1 – Town Centre Regeneration, INP2 – Town Centre land east of the River Erme, and INP3–</p>	<p>Environment Agency</p>		<p>Welcome the commitment to creating a better relationship between the town centre and the River Erme and improving access to the river.</p> <p>However, our Flood Map indicates that some land within the boundaries of these policies is at risk of flooding from the River Erme. We recommend that they include a commitment to improving the resistance and resilience of</p>	<p>Support welcomed.</p> <p>The policy will be amended in this respect.</p>

Glanville's Mill site			development in these areas and to pursuing any opportunities that might arise from redevelopment to reduce flood risk overall (e.g. by making space for flood water and naturalising the river corridor).	
INP1 – Town Centre Regeneration, INP2 – Town Centre land east of the River Erme, and INP3– Glanville's Mill site	Gladman		<p>Support planning for town centre regeneration. However there is no evidence to show that the planning obligations or financial contributions sought comply with paragraphs 173 and 204 of the Framework.</p> <p>The plan as a whole is not sufficiently growth orientated to secure the necessary financial contributions required to the deliver the plan and its objectives. The plan should allocate additional housing land .</p>	<p>It is considered that the policy requirements are appropriate and compliant. No change.</p> <p>The town's future growth is already addressed in the adopted DPD. This plan addresses town centre regeneration as a priority and aims to harness the benefits of planned growth for the town's good.</p>
Policy INP4: North of Fore Street	South Hams District Council		<ol style="list-style-type: none"> 1. This policy could be strengthened by alternative wording such as <i>Redevelopment and enhancement of the area to the northern side of Fore Street is proposed to include (as clause a). The Development will be required to deliver high quality design and safe and convenient access for all.</i> 2. Explain in supporting text what qualitative assessment has been undertaken to justify policy. 3. Clarify what is meant by 'high design standard?', how much and what type of residential, and whether it will be a net gain? 4. Need to provide details of what parking requirements are associated with redevelopment? 	<p>Amend policy and supporting text accordingly.</p> <p>Add explanation in supporting text.</p> <p>High design standard is self-explanatory. Housing numbers do not need to be specified.</p> <p>Normal adopted parking standards would apply.</p>
What will be	South Hams		The LPA understands that these boxes are extracted from	Amend wording for clarity.

the main changes in the town centre?	District Council		a consultation document but in this instance it is important to be clear that it is envisaged that traffic flow would be from west to east.	
Paragraph 4.17 Traffic and Movement	South Hams District Council		The last sentence of this paragraph could be clearer and should refer to traffic leaving the A38.	Amend wording.
Paragraph 4.19	South Hams District Council		Bullet point 1 - suggest reads as follows: a preferred design for an improved junction with the A38 Bullet point 3 - suggest reads as follows: the best location for any future junction on the A38 to serve the eastern side of the town.	Amend wording.
Para 4.20	South Hams District Council		Suggest omitting the word 'but' at the beginning of the third sentence to improve the meaning.	Amend wording.
Para 4.21	South Hams District Council		For clarity suggest amending last phrase to read as follows: Development should also contribute towards raising public awareness and enjoyment of these features. Consider how this can be done and check that this is followed through in policy.	Amend wording and consider policy implications.
Para 4.20 and 4.21	Environment Agency		With regard to the 'Town as a whole' policies we welcome the recognition in the supporting text that the River Erme is 'the town's principle natural asset' (paragraph 4.20) and the aim of the plan to conserve and enhance 'open spaces, woodlands and watercourses' (paragraph 4.21).	Support welcomed.
Policy INP5: Community Facilities	South Hams District Council		<ol style="list-style-type: none"> 1. The policy wording could be stronger and more direct than saying 'may include' 2. Some of the policy requirements are vague and questionable in terms of seeking contributions, for 	<p>Consider issues raised and amend policy wording for added clarity.</p> <p>The policy will make it clear that it</p>

			<p>example the creative arts and increased dual use of school facilities.</p> <ol style="list-style-type: none"> 3. It may be unreasonable to expect 'all' new development to contribute. The policy may not be CIL compliant. 4. Consider including neighbourhood shops in the list of facilities to bring forward an objective of the NP. 5. The list of community facilities in the policy appears not to be evidence based and is likely to compete with SHDC's priorities for contributions. 6. The need for improvements to playing pitches is identified in the South Hams and West Devon Playing Pitch Strategy 2015. 7. This policy may also wish to refer to improvements to parks, accessible natural spaces and allotments. 8. Extend clause g to cover multi – user routes rather than just cycling routes. 	<p>should be applied in accord with the adopted standards set in other policies which may be in force.</p> <p>It is necessary that a shop be viable in its own right and it is not considered appropriate to add it to the list shown in the policy.</p> <p>The list shown in the policy is based on local community aspirations.</p> <p>Noted. This supports its inclusion in the list shown.</p> <p>These were not identified as priority aspirations by the local community.</p>
Policy INP5 – Community Facilities	Devon County Council		<p>Support promoting the library as a key place for learning and community groups in addition to improved youth provision within the town and can provide advice and guidance on these matters.</p> <p>Support increased dual use of school facilities and are currently working with the community to secure funding for additional all weather training pitches which, it is envisaged, will be dual use.</p>	<p>Support welcomed and advice and guidance will continue to be sought.</p> <p>Support and dual use of all weather training pitches welcomed.</p>
Policy INP5 – Community Facilities	Gladman		<p>Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the</p>	<p>It is understood that these tests should be met. The policy helpfully sets out the community's aspirations for new and improved</p>

		<p>development.</p> <p>The policy should be tested for its effects on development viability. Contributions must be based on up-to-date, robust evidence of needs and cannot be used to make up the funding for desirable infrastructure, or to support the provision of unrelated items.</p>	<p>community infrastructure. There is no expectation that these can be delivered at the expense of development viability, but their identification enables better planning by all concerned. No change.</p>
<p>Policy INP6: Housing & Employment</p>	<p>South Hams District Council</p>	<p>Clause a)</p> <ol style="list-style-type: none"> 1. Following the successful legal challenge against the Government’s higher affordable housing thresholds, SHDC has reverted back to its previous policy position regarding AH thresholds (as per policy AH DPD Policy AH3). 2. Consider strengthening the policy along the lines of bringing forward development on a mixed use basis, including employment. 3. Clarify in supporting text what is meant by employment. 4. Consider the impact on viability of a contribution towards employment on development of 2 or more dwellings. 5. Clarify if a certain % of lifetime homes is sought by the proposal. 6. Provide evidence to support the various aspects of this policy to ensure it is achievable and deliverable. 7. Provide supporting text to demonstrate how financial contributions will be calculated. 8. Any requirement for a travel plan and assessments 	<p>Ensure policy aligns with the latest adopted development plan policies in force.</p> <p>Amend policy accordingly.</p> <p>This is self-explanatory.</p> <p>The plan does not require this.</p> <p>The plan requires that adopted development plan policy requirements continue to be met.</p> <p>The plan relies on the evidence and guidance on contributions which already supports the adopted and emerging development plans.</p>

			<p>must be consistent with the thresholds applied by the Highways Authority.</p> <p>Clause b)</p> <p>9. Meeting adopted housing standards is secured by building regulations and should not be included in policy. Development cannot be required to surpass these standards and the current policy wording is unenforceable.</p> <p>POINTS RAISED AT A MEETING ON 7th APRIL 2016</p> <p>10. What does this policy aim to add? Is 10 dwellings the right threshold for all policy elements?</p>	<p>Agreed.</p> <p>The policy does not require that developments must exceed adopted standards but encourages that they aspire to do so.</p> <p>Ensure policy aligns with the latest adopted development plan policies in force.</p>
INP6 – Housing and Employment	Gladman		<p>To require that development should at least meet and exceed the latest government housing standards should be removed from the INP. The Deregulation Act 2015 obtained Royal Assent on 30th March 2015. The written statement to parliament (dated 27th March 2015) makes clear that qualifying bodies preparing Neighbourhood Plans that the optional new national technical standards should only be undertaken through new Local Plan policies based on a clear up-to-date assessment of need. Neighbourhood Plans should not be used to apply the new national technical standards.</p> <p>Any reference to housing technical standards should be deleted from the INP. If this requirement is progressed it will be found inconsistent with basic conditions (a), (d) and (e) and may subject the INP to judicial review proceedings.</p>	<p>Gladman has misread the plan. It does not require that current standards necessarily be exceeded, rather it sets out a requirement that they be at least met and and, in line with local aspirations and objectives, that all should strive to do even better. This is a simple invitation to progress. No change.</p>
Policy INP7:Traffic and	South Hams District Council		<p>Clause a)</p> <ul style="list-style-type: none"> SHDC questions whether this warrants inclusion as 	<p>This policy responds to a priority concern expressed by the local</p>

Movement			<p>a policy. It also appears to predetermine the findings of any future study.</p> <p>Clause b)</p> <ul style="list-style-type: none"> • Evidence is needed to support this. • There is no such requirement in the Ivybridge DPD (Feb 2011) so it is unlikely that this could be implemented. • There is no evidence to support the requirements for design and delivery before 2021 or ahead of 50% of allocated developments. <p>Clause c)</p> <ul style="list-style-type: none"> • The details of any contribution should be clarified. • SHDC assumes that this does not include the sites already allocated, particularly as requirements cannot be required retrospectively and at this stage the study has not been undertaken. 	<p>community. It does not seek to predetermine findings but to ensure that possible solutions put forward over the years are not overlooked. The policy will be redrafted to be more consistent with others in the plan.</p> <p>The timescale and threshold may be unduly ambitious, but they set targets to aim for. These targets will be carefully considered.</p> <p>Although the plan cannot, of course, be applied retrospectively, it can apply to allocated sites which have yet to receive planning permission.</p>
Transportation Map	South Hams District Council		<ol style="list-style-type: none"> 1. The transportation map identifies proposals outside of the neighbourhood plan area, and as such are undeliverable through the INP. The status of these proposals should be clarified, especially the routes identified to the south of the A38. 2. There appears not to be any cross referencing to text in the INP to support the map. 3. The status of the map needs clarification – is it for information or does it show any proposals? 4. There is no evidence to show how any proposals can be brought forward, for example funding and delivery prospects. 	<p>The Transportation Map is for information and not part of the Proposals Map. Amend plan to make this clear.</p> <p>Possible transport solutions outside the plan area are shown for information only.</p> <p>Cross references will be added.</p> <p>There is a dearth of hard evidence (although plenty of local knowledge of the issues) – hence the need for</p>

			5. The key needs further clarification e.g. National Routes – does this mean NCN National Routes (National Cycle Routes)?	a study. The key will be made clearer.
INP7 – Traffic and Movement	Highways England		Note that the plan seeks to commission a study to recommend traffic measures to address improved access to and junctions with the A38. Reiterate their view that current levels of proposed growth would not support extensive junction improvements and that any such would, in any case, not be easily deliverable (if at all), and that Ivybridge is not a priority site for improvements on the strategic road network.	This view is understood. However, the plan seeks to enable a detailed assessment of what will be the best way to address existing and future traffic difficulties, bearing in mind that further growth may well be proposed for the town.
INP7 – Traffic and Movement	Devon County Council		<p>Devon County Council has concerns about the transport solutions suggested in the Plan, including improved junction arrangements at the A38, provision of a major new junction onto the A38 and a new link road to the south of the town. The County Council maintains that this infrastructure is unaffordable and undeliverable.</p> <p>As of 2015 the County Council must seek funding for major infrastructure through the Growth Deal process, which is managed by the Local Enterprise Partnership. This offers little scope to secure external funding to deliver major transport schemes.</p> <p>The road system to be delivered as part of the proposed growth to the east of the town will provide some relief on Exeter Road and enable improved walking and cycling links through the town. Where walking and cycling plans are developed by the community, with match funding secured and land assembled, there may be scope for some limited LTP funds to be allocated to support their delivery. There are also potential small scale, traffic management measures that can be investigated to</p>	<p>Following a meeting further clarification is awaited from the County Council. The plan does not specifically propose such measures, but rather that a study be carried out to ascertain what measures will be appropriate (and affordable and deliverable) in order to address the town's growing traffic difficulties, and that such measures be considered.</p> <p>Changes to the plan to include such minor measures will be acceptable providing they do not dilute the plan's focus on securing significant change for the better.</p>

		<p>improve air quality on Western Road.</p> <p>DCC's supplementary comments</p> <p>Clause a) proposes a traffic study to resolve current traffic issues identified by the community, whose consideration is valid. Clauses (b) & (c) go on to indicate that allocated development within the 2011 DPD should be required to fund both a study and also any transport improvements identified by the study.</p> <p>Where necessary Traffic Assessments (or traffic studies) are always required for significant new developments. Requesting funding from developments to undertake a separate traffic study is really questioning the validity of these assessments. For improvements to be funded and delivered by new developments then then these improvements should be reflected by the TA or in the DCC response to the TA.</p> <p>If the policy objective is for a traffic study to consider what measures might be appropriate or beneficial for the town then, while this is a valid local objective, it may well be beyond the scope of being funded and delivered by new developments. A policy commitment to deliver by 2021 or 50% DPD is not realistic if it is intended to consider or address any of the three stated policy issues.</p> <p>Should significant new development around the town be identified in the emerging Local Plan then DCC may need to consider the traffic impact and benefits of these kinds of measures. But without significant new allocated development being considered then DCC would not be in a position help fund a new study.</p>	<p>Clause c) in fact requires any new development to contribute, not just that proposed in the 2011 DPD.</p> <p>It is considered that there is a need for a holistic study of the town's existing and future traffic issues, particularly in view of the likelihood that the new local plan will require further new development in the town.</p> <p>It is accepted that the 2011 DPD allocations alone could not reasonably be required to fund the study and any recommended measures.</p> <p>It is understood that a study is largely dependent on the new local plan and the policy has been written with this in mind. The plan will be amended to make this clearer.</p>
Policies INP5 –	Hannick	Policy CS8 (Infrastructure Provision) of the Core Strategy	In view of Ivybridge's historic

<p>Community Facilities, INP6 – Housing and Employment and INP7 – Traffic and Movement</p>	<p>Homes</p>		<p>sets out a requirement for necessary infrastructure to be in place or provided in phase with development. It also seeks financial contributions towards such provision, where appropriate. As the Neighbourhood Plan is required to be read alongside the Development Plan the references in INP5 - INP7 to contributions are unnecessary.</p> <p>The wording of the policies also conflicts with the Community Infrastructure Levy (CIL) provisions. South Hams District Council will, in due course, adopt CIL rates for the district, dealing with wider, non site specific infrastructure. It will still be possible for requirements specific to a proposed development to be dealt with under S106. The policies of the Plan, however, suggest that s.106 agreements will be used to secure off-site benefits and this ignores CIL.</p> <p>Suggested change: Delete the references to contributions from Policies INP5 - INP7. Add explanatory text setting out the arrangements which apply as a result of CIL and clarifying the relationship between CIL and site specific s.106 agreements.</p>	<p>infrastructure deficits it is considered important to make every effort to ensure that necessary support infrastructure is provided for as part of new developments. It is helpful for the plan to include these requirements which are not in conflict with the strategic policies of the development plan.</p> <p>Furthermore, until such time as SHDC has put CIL in place it is considered appropriate and helpful for the policies of the plan to reinforce the need for new developments to provide for infrastructure.</p> <p>It is, however, accepted that the plan could add reference to the prospect of CIL in future, and this will be done.</p>
<p>Policy INP8: Historic and Natural Environment</p>	<p>South Hams District Council</p>		<ul style="list-style-type: none"> • The open space policy needs to be cross referenced to the Historic and Natural Environment proposals maps. <p>Clause a)</p> <ul style="list-style-type: none"> • Further definition is needed of what the town’s important and locally significant historic features and natural environmental assets are. • Clarification about how new development will respect, complement, conserve and enhance would strengthen this policy. 	<p>Cross references will be added, although it should be noted that the map is for information only.</p> <p>The plan will be expanded to refer to these in more detail.</p> <p>Further detail is not needed and would be likely to fetter good</p>

		<p>Clause b)</p> <ul style="list-style-type: none"> • The open space proposals must be consistent with the Ivybridge DPD (Feb 2011). A parcel of land to the west of the rugby club which is part of the I1 allocation is identified in the Draft INP as open space and is therefore protected from development. • Assuming that the policy applies to the open spaces identified on the map, the two largest areas shown lie outside the NP designated area and therefore the policy cannot apply to them. • Evidence should be provided to justify designation of these areas. <p>Clause c)</p> <ul style="list-style-type: none"> • Does this refer to the important woodland identified on the map but these lie outside the NP area? • The question is raised about how to assess and secure the management of this through the policy and the policy needs to be clear about what type of management would promote biodiversity. This point may be combined with open spaces which can also provide value for biodiversity. • Suggest revised wording for INP8 b) and c): Woodlands and open spaces will be kept free from development other than that which is directly associated with their management, maintenance and enhancement. Management of such areas will promote biodiversity’. <p>Clause d)</p>	<p>design.</p> <p>Amend plan accordingly.</p> <p>The map is for information only. Policy cannot apply outside the plan area but the areas are shown because of their significance to the town.</p> <p>The policy cannot apply outside the plan area.</p> <p>The plan will be amended accordingly.</p>
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			<ul style="list-style-type: none"> • Further clarification is needed to identify how the River Erme and other watercourses will be protected, for example is this through benefits accrued through development? 	The policy will be amended to require that new developments should not damage but enhance the Erme's ecological status, as suggested by the Environment Agency.
Policy INP8 – Historic and Natural Environment	Natural England		<p>Natural England's statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We welcome policy that will ensure “new developments will respect, complement, conserve and enhance...natural environmental assets and their enjoyment by the public.”, “woodlands will be protected from development and their management will promote biodiversity.”, and “water quality in the River Erme and other watercourses will be protected, and where necessary or possible, enhanced.”</p> <p>These measures accord with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that ‘<i>Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity</i>’. Section 40(3) of the same Act also states that ‘<i>conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat</i>’.</p>	Support welcomed.
Policy INP8 –	Environment		Welcome commitments to protect and enhance water	Support welcomed.

Historic and Natural Environment	Agency		quality in the River Erme and other watercourses as well as to keep open spaces free from development. The latter will be important in areas adjacent to the River Erme especially with regard to making space for flood waters. We recommend the policy or supporting text refers to this benefit that open space can provide. We would also welcome a commitment to, wherever possible, increasing provision of open space particularly adjacent to watercourses.	The plan will be amended accordingly.
Policy INP8 – Historic and Natural Environment	Gladman		New development can often enhance existing green infrastructure, where necessary, through good quality design. This policy will need to ensure sufficient flexibility i.e. for access to ensure the delivery of a wider scheme and the benefits associated to its development.	Noted. No change necessary.
Strategic Environmental Assessment / Sustainability Appraisal				
Strategic Environmental Assessment / Sustainability Appraisal	Gladman		The local planning authority, as part of its duty to advise and assist, should put in place processes to determine whether the proposed neighbourhood plan will require an SEA, this has not been carried out. The Scoping Report and Sustainability Appraisal has not been undertaken in accordance with the requirements.	A screening opinion has been sought from the LPA. The current report and appraisal are at draft stage and will be developed further, including necessary consultations.
Miscellaneous				
Various	Ian Smith		Detailed written response to Survey Monkey questions	Picked up in Hannah's analysis of on-line questionnaire???
Monitoring				
Monitoring	Various		Several comments, particularly from SHDC, refer to the need to monitor the plan's effectiveness.	Develop a simple monitoring framework for the plan.

