

## Part 2 – detailed assessment of the pre-submission Draft Ivybridge Neighbourhood Plan.

This section provides a more detailed assessment of the INP.

In many cases, the objective and intent of the policy is, in principle supported. The suggestions are aimed at ensuring that the policies achieve the objective for which they are intended, are compliant and can be realised.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
Foreword			
Foreword	For transparency.		Explain that Draft INP has been prepared by Lee Bray (MRTPI) on behalf of the INPG
Foreword – paragraph 6	Clarify that the INP will be used, alongside local and national planning policy, to help determine planning applications.		Suggest additional wording to reflect this.
Section 1: Introduction			
General comment	It is important to explain at the beginning of the document what the INP focuses on and what it does not cover (e.g. future housing growth and employment). This explanation should also clearly state that the INP neither constrains development proposed in the adopted local plan nor intends to restrain future growth to meet the development needs of the area. It has chosen to focus on the town centre and not to engage with wider planning issues. The LPA considers that this point should be explicitly made in the introduction.		Suggest additional wording to explain this.
General comments	Refer to local strategic context with adopted local plan to 2016 and preparation of a new plan by SHDC with a horizon to 2031 (or later).		Add wording to cover local strategic planning context.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
General comment	It would add clarity to explain how the document is set out. For example, the first section looks at the local context; the following section focuses on the aspirations and strategic objectives of the Plan which have been developed from the community vision for INP; and that these form the basis for the detailed planning policies to help guide development primarily in the town centre.		Suggest add text to explain how INP is set out.
General comment	A neighbourhood plan (NP) is a policy document which sets out rules about how local development will take place. It can be focused on a small number of issues of particular concern to local people. Alternatively, it can provide policies and proposals across a wide range of planning and development issues. Local people decide what they want to have included in it. There can only be one neighbourhood plan in any designated area but a NP area can extend beyond a parish boundary so long as it is included in the designated area.		Suggest give clarity about what the INP focuses on at the beginning of the document.
General comment	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). South Hams District Council (SHDC) uses this framework to guide its decisions on the planning applications it receives. It is also used by Planning Inspectors and the Secretary of State if there is an appeal against a decision by South Hams Council.		Explain role of NP in statutory development plan for the area.
Paragraph1.2	Neighbourhood Planning Regulations 2012 refer to an 'independent' examination rather than a 'public' examination. Most neighbourhood planning examinations are held by	Neighbourhood Planning Regulations 2012	Suggest change word 'public' to 'independent' examination.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	written representations and it may be misleading to imply that there will be a public hearing.	NPPG	
Paragraph1.3	This paragraph could be strengthened: it explains the purpose of preparing the neighbourhood plan for Ivybridge and what it is trying to achieve.		Expand and be more specific.
Ivybridge NP Area map	Plan area must be clear.		Strengthen boundary edge.
Paragraph1.4	It is important to be clear about the neighbourhood plan area.		Be specific and refer to the NP area including an area to the east of the town boundary which lies within Ugborough Parish. Also suggest provide an explanation of why the NP area includes land within Ugborough Parish and consider including a reference to the Ugborough Neighbourhood Plan.
Paragraph1.6	It is important to explain how the community and stakeholders have been involved.		Explain that more information about how the community and others have been consulted and have helped shape the INP is set out in the INP Statement of Consultation (June 2015).
Paragraph 1.10 & 1.11	Clarify information about the process of preparing neighbourhood plans and the key stages involved.		Provide further detail to explain submission of

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
			neighbourhood plan to LPA, formal consultation, independent examination and referendum etc.
Paragraph1.13	Clarify examination of neighbourhood plans.		Change word 'public' to 'independent examination'
Paragraph1.13	Neighbourhood Plans once made help shape development in an area. It is unrealistic to give the impression that neighbourhood plans by themselves will guide and manage development in the town.		Explain that neighbourhood plans, once 'made', help to shape new development and guide decisions on planning applications as part of the local development plan and national policy and guidance.
Paragraph1.14	The LPA welcomes the alignment of the INP 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.
Page 7	Great photographs giving a real feel for the process. It would be interesting to add references?		Add name of events.
Section 2: Ivybridge in Context			
General comment	The local context should include the local planning context (Ivybridge DPD February 2011, saved policies from the 1996 Local Plan and the emerging Our Plan and relevant evidence) and other Local Development Framework (LDF) document.		Add planning context.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
General comment	The INP – evidence base schedule does not include reference to ecology or heritage designations. The neighbourhood plan should refer to any relevant designations e.g. SSSI, conservation area or listed buildings (numbers etc).		Include ecology and heritage related evidence and add reference to designations and their sensitivities.
Paragraph 2.5	Use up to date evidence.		Refer to 2011 census and latest ONS figures.
Paragraph 2.6	Include reference to all forms of transport – including the main line railway, bus services and cycling/walking.		Add detail about all forms of transport.
Paragraph 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.		Add detail about which school this refers to and the criteria for success.
Paragraph 2.10	Be more specific about areas of changes the INP addresses to help secure the town’s future. The neighbourhood plan primarily focuses on the town centre and it would be helpful to reiterate this here.		Add details about focus of INP by defining issues and areas of policy addressed in neighbourhood plan.
Section 3: Vision and Objectives			
Objectives for the Plan – General comment	These have good intentions and in principle are supported. However, the links to clear and detailed evidence need to be strengthened to support local aspirations. This will help provide a sound and robust basis for the neighbourhood planning policies which will be used to help determine planning applications and shape future development.		Ensure clear link to evidence and add reasoned justification to support each objective.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
Transport & Movement Objectives	Transport & Movement Objectives – this should include reference to the railway which forms the boundary to the north of the town and offers good transport links beyond the town. The main line railway does not feature on the ‘Transportation’ map (page 20). This facility was highlighted by the Princes Foundation for Building Communities for Ivybridge Town Council as a great opportunity to develop Ivybridge as a visitor destination, for outdoor activities and access to Dartmoor.		Add reference to main line railway and include on Transportation map (page 20).
Transport & Movement Objectives (page 10)	It is important to quantify what ‘much more’ cycling and walking and ‘many fewer’ car journey’s means.		Add detail for monitoring purposes and to assess whether the Plan has met its objectives.
Transport & Movement Objectives (page 10)	Although it is recognised that 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. Alternatively, a transportation study could identify the key issues about traffic and transportation in Ivybridge and make recommendations about how to address them. The ‘INP – schedule of evidence’ does not include evidence to support the key transportation issues.		Provide evidence and consider promoting a transportation study to identify key issues.
Transport & Movement Objectives (page 10)	Include ‘an integrated travel plan’ as a key issue for a transportation study to consider (including reference to bus and rail links).		Add further key issue for transportation study to explore.
Transport & Movement Objectives (page 10)	Include objective about how to build on opportunities for recreation and tourism and increasing local visitors to town based on travel links, including bus and rail.		Add further key issue to transportation study to explore.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
Sport & Leisure Objectives	<p>These establish some good principles around the promotion of sport, exercise and improvements to facilities. These could be expanded on to include the following which contribute to leisure, tourism and health and well-being;</p> <ul style="list-style-type: none"> <li>• Parks, accessible natural spaces (e.g. nature reserves, community orchards, accessible woodlands)</li> <li>• Public rights of way, permissive paths and unclassified county roads to promote access to the surrounding countryside/moor.</li> </ul> <p>The Devon Countryside Access Forum has developed guidance about recreation and access in neighbourhood planning and this could be a useful reference.</p>		Expand objective.
Sport & Leisure Objectives	SHDC is preparing a template to help towns and parishes prepare Open Space, Sport and Recreation Plans and this could inform and provide evidence for neighbourhood plans.		Use SH template to prepare Open Space, Sport and Recreation Plan to support INP.
Sport, Leisure & Tourism Objective – bullet point 1 (page 11)	It is important to be able to measure these objectives.		Consider how the wording could reflect a measurable objective which is reflected in policy for sport, leisure and tourism.
Sport, Leisure & Tourism Objective – bullet point 2 (page 11)	The reference to catering for any talent or chosen sport or activity is ambitious. It is important to recognise that there are other facilities nearby e.g. Plymouth and that it is not necessarily realistic to replicate these and perhaps better to focus on particular facilities which the town could be well known for. There is no indication of how this could be achieved.		Rewrite with a more realistic and achievable objective.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
Sport, Leisure & Tourism Objective – bullet point 3 (page 11)	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 mothers etc		Consider if the reference should be to ‘young people’ and ‘older people’ and if it is appropriate to focus on these groups.
Sport, Leisure & Tourism Objective – bullet point 4 & 5 (page 11)	Reference to facilities should reflect the SH OSSR and Playing Pitch Strategy (PPS).		Policies will need to reflect needs assessment of PPS.
Sport, Leisure & Tourism Objective – bullet point 5 (page 11)	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?		Provide reasoned justification, how this could be incorporated as a land use policy and how restrictions such as security and public liability are overcome. Consider including reference to the school’s policy, aspirations and future plans.
Sport, Leisure & Tourism Objective – bullet point 6 (page 11)	Add an adjective to this objective, such as ‘Support any proposal for visitor accommodation ...’		Add objective
Sport, Leisure & Tourism Objective –	Clarify which cycle routes this refers to (e.g. town centre cycle routes linking to other routes?) and consider promoting links to railway. Cycle routes do not feature on the		Clarify and consider linking to other modes of transport and add to Transportation



Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
bullet point 7 (page 11)	'Transportation' map (page 20).		map? Consider adding an objective specifically relating to the National Cycle Network (NCN).
Employment Objectives (page 11)	Emphasis on marketing and IT could narrow employment opportunities and the objective lacks explanation to support why these particular areas are desired. Evidence should be provided to show that marketing and IT jobs could be achieved locally, meet the skills profile locally and are the right jobs for Ivybridge.		Review objective.
Employment Objectives (page 11)	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 the housing site, characteristics of the site (e.g. neighbours, highways etc) or viability. Local evidence that this can be achieved is lacking as is the justifiable reason that this is the best way to bring forward employment.		Review objective.
Shopping and the Town centre Objectives (page 11)	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 centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres'). Neither is it compliant with the ALP policy SHDC 23: Shopping in Towns, a saved policy from South Hams Local Plan (Part 1: General Policies) 1989 – 2001 (April 1996). There appears to be no justification to include the area to the north which includes Stowford Mill.		Provide reasoned justification and clarity around definition of town centre area and reference to enhancements. Consider if this will inadvertently weaken the town centre.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
Shopping and the Town Centre Objectives (page 11)	Perhaps 'create opportunities' would better reflect the objective to increase evening trade such as restaurants etc		Consider amending wording.
Shopping and the Town Centre Objectives (page 11)	Glanvilles Mill is in private ownership and it would be more realistic and achievable to use the word 'support 'proposals to redevelop'.		Amend wording.
Shopping and the Town centre Objectives (page 11)	The reference to the holistic redevelopment of Butterpark and Sportsmans Inn sites would be better supported with an idea about what uses would be supported and indicate how this may be achieved. This is not taken forward in the INP policies so this objective cannot be delivered.		Amend wording to support redevelopment and refer to preferred new uses or design etc or consider deleting from objective and include in text.
Community Objectives (page 12)	The reference to public art is vague and cannot reasonably be required in all developments over a certain size. The size of developments also needs to be clarified. There are issues of viability, and this provision cannot take precedence over the Council's agreed approach to seeking contributions, which includes meeting its own priorities such as providing affordable housing and supporting education requirements.		Amend objective to 'promoting 'public art and 'encouraging' its inclusion in developments. Perhaps the objective could reasonably be to support community initiatives to promote public art.
Environment Objectives (page 12)	These objectives are supported and aim to protect and enhance the natural and built environment within the Plan area.		Clarify that this objective includes the natural and built environment.
Environment Objectives (page 12)	The 'INP – Evidence base' does not include any reference to ecology and heritage evidence to support elements of this objective.		Add evidence to support the biodiversity, ecology and heritage aspects of

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
			this objective.
Environment Objectives	The Devon Landscape Policy Group guide for neighbourhood plans includes the use of Landscape Character Assessments in NP's and this may be useful to support objectives and policies in the NP.		Consider using this guidance to support the INP.
Environment Objectives (page 12) -bullet point1	It would be helpful to know if this refers solely to the 'open spaces' shown in the 'Historic and Natural Environment' map (page 22). If this is not the case, clarify what is meant by informal open green spaces and provide an explanation about how these different classifications are so defined. It is important to provide evidence to establish why these areas deserve special consideration to the extent that they should be protected. A number of the areas shown as 'open spaces' on the Historic and Natural Environment map conflict with proposal I1 in the Ivybridge Site Allocations DPD (Feb 2011) and may conflict with potential future development areas, including new infrastructure such as the link road identified in the INP.		Provide clarification and definition of informal open green spaces. Demonstrate the need to protect these areas against all other uses. Clarify link with 'Historic and Natural Environment' map. Consider if it would be more effective to focus on most significant ones. Suggest explanation of link through to policy and what it is seeking to achieve.
Environment Objectives (page 12) – bullet point 1	The NPPF seeks to 'conserve and enhance' the natural and built environment and it is appropriate for the INP to reflect national policy.		Amend wording to reflect NPPF.
Environment Objectives (page 12) – bullet point 2	It would add weight to the general objective to conserve and/or enhance biodiversity to refer to biodiversity in general, which would include woodland biodiversity. If there is a particular reason to refer specifically to woodland biodiversity		Amend wording to read conserve and enhance biodiversity, including woodland biodiversity.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	provide reasoned justification.		
Environment Objectives (page 12)	It may be unrealistic to have an objective to 'reduce' pollution.		Suggest amend wording to say 'Support measures to help reduce pollution'.
Environment Objectives (page 12) – bullet point 4	Further clarification of the objective to 'protect and invest in the Ivybridge Conservation Area would be helpful, including details of how this is to be encouraged and what it would be used to achieve.		Add further details about the investment aspect of this in the reasoned justification.
Environment Objectives (page 12)	Reflect NPPF and refer to 'conserve and enhance' historic features and natural resources.		Amend wording to reflect NPPF.
Environment Objectives (page 12)	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.
Environment Objectives (page 12)	<p>There would be merit in referring to green infrastructure. The South Hams Green Infrastructure Framework has themes covering:</p> <ul style="list-style-type: none"> <li>• Access, Health and Recreation;</li> <li>• Biodiversity, Landscape and Heritage;</li> <li>• Sustainable drainage, flood alleviation and water quality; and</li> <li>• Local Food and fuel.</li> </ul>		Consider role of green infrastructure in objectives of the INP.
Section 4: Policies and Proposals			

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
Paragraph 4.1	It would be helpful to clarify that the Plan does not deal with the current housing allocations proposed in the Ivybridge DPD (Feb 2011) or with future development requirements and this does not imply that it intends to undermine either.		Add further wording to clarify this point.
Paragraph 4.2	It is unclear what is meant by the following sentence: <i>‘Some policies aim to put in place the mechanisms to enable investment in facilities and infrastructure needed for Ivybridge but which lie just outside the town’</i> . Does this refer to outside the administrative parish boundary or the designated area of the INP? A neighbourhood plan can only make proposals within the neighbourhood plan area but can contain policies which seek contributions from future development to support needed facilities and infrastructure.		Add further wording to clarify what is meant by ‘outside the town boundary’ and if this aim seeks to place further requirements on the allocations in the Ivybridge DPD (Feb 2011).
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 should reflect the Ivybridge DPD (2011) and the ‘Health and Wellbeing Partnership’ proposals for the area (which takes the Ivybridge DPD Proposal I2 IvybridgeCentral Area forward) in order to be in conformity with local policy and projects.
Paragraph 4.4 – second bullet point.	Glenville’s Mill is in private ownership and this reflects the community’s aspirations to improve the appearance of this shopping area.		
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 text to include the need to provide bridges across the River Erme which are accessible for

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
			all.
Paragraph 4.5	<p>It is unclear whether the definition of the town centre, and thereby the reference to the growing retail footprint, is made in the 'Site Proposals' map as the area shown as INP1: Town Centre. This could undermine and impact on the viability of the existing town centre and retail shopping area currently focused on Fore Street and other policies proposed in the Draft INP (Policy INP 2: Town Centre land east of the River Erme and Policy INP 3: Glanville's Mill Site).</p> <p>It is also unclear if this means that this would support retail uses anywhere within the area shown on the Site Proposals Map as INP1: Town centre.</p> <p>It aims to limit retail elsewhere but clarification is needed about what this means for example, does this include small scale neighbourhood shops in new developments, and to explain how the INP seeks to achieve this.</p>		Provide a clear definition of the town centre and an assessment of the impact of an extended town centre on the viability of the primary retail centre area focused on Fore Street. Clarify what is meant by limiting retail elsewhere.
Paragraph 4.6	<p>Definition of what 'all kinds of development' is needed. The term needs to be refined and assessed to see if it meets CIL tests. Financial contributions should not be contrary to Section 106 of The Town and Country Planning Act 1990. Planning obligations are mechanisms which make a proposal acceptable in planning terms that would not otherwise be acceptable and to ensure they do not prejudice development coming forward.</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>		Define 'all kind of developments', amend initiatives and ensure wording is not in contrary to planning regulations concerning the imposition of S106 requirements, including CIL compliance.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
<b>Policy INP1: Town Centre Regeneration</b>	<ol style="list-style-type: none"> <li>1. This policy is critical to supporting the aims of the INP and should be clear and direct in terms of what it is proposing and can deliver. The area defined on the Site Proposals map as INP1 is proposed for town centre regeneration to include: <ul style="list-style-type: none"> <li>• a town square</li> <li>• enhanced gateways at either end of Fore Street</li> <li>• changes of use which support the overall vitality of the town centre.</li> </ul> </li> <li>2. The LPA considers that this policy could be strengthened by turning it into a proactive policy rather than one which ‘encourages and supports’ and questions if some elements are appropriate for inclusion as upper case policy, for example the reversal of the traffic flow (which is a traffic management issue and not strictly a planning issue).</li> <li>3. The Site Proposals Map (page 16) should be referred to in policy.</li> <li>4. Consider revising town centre area shown on site proposals map (INP1 Town Centre) to reflect adopted local plan.</li> <li>5. The LPA also has concerns about the requirement that ‘all’ new development should make a contribution (see INP1 clause d).The phrase ‘new development’ needs refining. The LPA also questions whether clause INP d) would be better included in Policy INP5:</li> </ol>		<p>Amend text to reflect these issues.</p> <p>The contribution sought from new development will be considered against the Council’s priorities for affordable housing and other policy requirements.</p> <p>Any residential development in the town centre will be required to make a contribution to on site provision or a financial contribution towards off – site improvements.</p> <p>Amend site proposals map to reflect adopted local plan. Refer to South Hams Local Plan (Part 1: General Policies) 1989 – 2001 (April 1996): SHDC 23: Shopping in Towns (saved policy) and Part 3 Ivybridge Area (Inset map Iv2 Town Centre).</p>

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>Community Facilities.</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><b>Policy INP2:Town Centre land east of the River Erme</b></p>	<p>1. The policy could be strengthened by alternative wording such as:</p> <p><i>The area is proposed for mixed use redevelopment to include:</i></p> <ul style="list-style-type: none"> <li>• <i>a health and leisure hub</i></li> <li>• <i>a hotel and restaurant</i></li> <li>• <i>retail and office development and so on.</i></li> </ul> <p><i>Development will be required to provide for:</i></p> <ul style="list-style-type: none"> <li>• <i>high quality design solutions</i></li> <li>• <i>a safe and attractive environment and so on</i></li> <li>• <i>improved access etc</i></li> <li>• <i>and no loss of car parking <u>capacity</u></i></li> </ul> <p>2. 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</p>		<p>Amend wording to provide more effective and clearer policy.</p> <p>Add the word capacity to car parking loss.</p> <p>Consider how any such scheme would be funded so the policy requirements are deliverable and achievable.</p> <p>Consider including a housing element to help deliver the other elements of the policy and to bring it in line with the</p>



Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>does not propose any development to enable delivery of the overall proposal.</p> <p>3. It would also be helpful to include a requirement for a masterplan for the area in the policy to ensure delivery of a viable and comprehensive scheme.</p>		development plan.
<p><b>Policy INP3: Glanville's Mill Site</b></p>	<p>1. This policy expresses a community aspiration for this site and could be strengthened by alternative wording such as;</p> <p><i>The redevelopment and enhancement of Glanville's Mill is proposed for the following mixed uses:</i></p> <p><i>Development will be required to provide for a) b)c) d) e) (as referred to in INP3).</i></p> <p>2. Clarification is sought regarding the following:</p> <ul style="list-style-type: none"> <li>• what is meant by the terms 'an improved shopping experience' and 'predominantly' retail use</li> </ul> <p>If these cannot be defined with clarity they should be deleted</p> <ul style="list-style-type: none"> <li>• a definition of primary shopping frontages</li> </ul> <p>3. The inclusion of a specified residential element should be considered in order to assist overall viability and deliverability. It is worth noting here that the Draft INP does not include a housing policy to meet future housing needs and will therefore rely on the current allocations together with any additional allocations that may be included in the new Local Plan.</p>		<p>Consider issues raised and amend policy and supporting text accordingly.</p> <p>Indicate new river crossings on Site Proposals map.</p>

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>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.</p> <p>5. The potential impact of new bridges over the River Erme may have implications on the SSSI downstream. No sites have been identified within the proposals map and these 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> <p>Alternatively, the policy could require that there is no adverse impact on water quality or the integrity of the SSSI.</p>		
<p><b>Policy INP4: North of Fore Street</b></p>	<p>1. This policy could be strengthened by alternative wording such as 'Redevelopment and enhancement of the area to the northern side of Fore Street is proposed to include clause a). The Development will be required to deliver a) high quality design and b) safe and convenient access for all.</p> <p>2. It is important to explain in supporting text what qualitative assessment has been undertaken to justify</p>		<p>Suggest Including the land uses in main part of proposal and indicate in the clauses what the development should deliver.</p> <p>Provide definition and assessments as</p>

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>redevelopment of the North of Fore St area?</p> <p>3. It is important to clarify what is meant by 'high design standard?', to define how much and what type of residential is provided for by the policy and whether it will replace what is there already, or propose a net gain?</p> <p>4. Need to provide details of what parking requirements are associated with redevelopment?</p>		highlighted.
'What will the minia changes in the town be'	The LPA understands that these boxes are extracted from 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.		Amend wording to reflect more accurately the direction of traffic flow.
Paragraph 4.17 Traffic and Movement	The last sentence of this paragraph could be clearer and should refer to traffic leaving the A38.		Amend wording.
Paragraph 4.19	<p>Bullet point 1 Suggest reads as follows: a preferred design for an improved junction with the A38</p> <p>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.</p>		Suggested new wording.
Paragraph 4.20	Suggest omitting the word 'but' at the beginning of the third sentence to improve the meaning.		Suggest amend text.
Paragraph 4.21	For clarity suggest amending last sentence to read as follows: Development should also contribute towards raising public awareness and enjoyment of these features.		Suggest amend text and address issue raised.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	Consider how this can be done and check that this is followed through in policy.		
<b>Policy INP5: Community Facilities</b>	<ol style="list-style-type: none"> <li>1. The policy wording could be stronger and more direct than saying 'may include' if the policy is to be strong enough to be applied to decision making.</li> <li>2. Some of the policy requirements are also vague and are questionable in terms of seeking contributions, for example improved facilities for the creative arts and measures to support increased dual use of school facilities.</li> <li>3. The term 'new development' needs to be refined as it may be unreasonable to expect 'all' new development to contribute. This should define the scale and type of development. There are strict regulations and guidance governing how contributions are collected and the LPA is concerned that the policy may not be CIL compliant.</li> <li>4. Consider including neighbourhood shops in the list of facilities to bring forward an objective highlighted in the Plan.</li> <li>5. The list of community facilities provided within the policy appears not to be evidence based and are likely to compete with the Council's own priorities for contributions, which are set out in both policy and evidence of needs, such as the Affordable Housing</li> </ol>		Consider issues raised and amendments to wording.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>DPD and the South Hams Play Pitch Strategy.</p> <ol style="list-style-type: none"> <li>6. The need for improvements to playing pitches is identified in the South Hams and West Devon Playing Pitch Strategy 2015.</li> <li>7. This policy may also wish to refer to improvements to parks, accessible natural spaces and allotments.</li> <li>8. INP5 g) Extend this point to cover multi – user routes rather than just cycling routes. This is a preference position, although it is acknowledged that it is unlikely to be possible in many instances.</li> </ol>		
<p><b>Policy INP6:Housing &amp; Employment</b></p>	<p>INP6 a)</p> <ol style="list-style-type: none"> <li>1. Following the successful legal challenge against the Government’s higher affordable housing thresholds, the Council has reverted back to its previous policy position regarding AH thresholds (as per policy AH DPD Policy AH3).</li> <li>2. Consider strengthening the policy along the lines of bringing forward development on a mixed use basis, including employment.</li> <li>3. Clarify in supporting text what is meant by employment.</li> <li>4. Consider the impact on viability of a contribution</li> </ol>		

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>towards employment on development of 2 or more dwellings.</p> <ol style="list-style-type: none"> <li>5. Clarify if a certain % of lifetime homes is sought by the proposal.</li> <li>6. Provide evidence to support the various aspects of this policy to ensure it is achievable and deliverable.</li> <li>7. Provide supporting text to demonstrate how financial contributions will be calculated.</li> <li>8. Any requirement for a travel plan must be consistent with the thresholds applied by the Highways Authority.</li> </ol> <p>INP6 b)</p> <ol style="list-style-type: none"> <li>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.</li> </ol>		
<p>Policy INP7:Traffic and Movement</p>	<p>INP7 a)</p> <ol style="list-style-type: none"> <li>1. The LPA questions whether this warrants inclusion as a policy.</li> <li>2. The policy appears to predetermine the findings of any future study</li> </ol> <p>INP6 b)</p> <ol style="list-style-type: none"> <li>3. Evidence is needed to support this.</li> </ol>		<p>Consider whether all or parts of this policy should be included as upper case policy.</p> <p>Clarify issues raised and consider ammedements.</p>

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>4. There is no such requirement in the Ivybridge DPD (Feb 2011) so it is unlikely that this additional requirement could be implemented.</p> <p>5. What is the evidence to necessitate and seek a desired transport solution to be designed and delivered by <u>2021</u> or before <u>50%</u> of the sites allocated in the Ivybridge DPD are built?</p> <p>INP6 c)</p> <p>5. The details of any contribution should be clarified.</p> <p>6. The LPA 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 be undertaken.</p>		
Transportation Map	<p>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.</p> <p>2. There appears not to be any cross referencing to text in the INP to support the map.</p> <p>3. The status of the map needs clarification – is it for information or does it show any proposals?</p> <p>4. There is no evidence to show how any proposals can</p>		Consider issues. provide clarification and consider amendments to policy.

Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>be brought forward, for example funding and delivery prospects.</p> <p>5. The key needs further clarification e.g. National Routes – does this mean NCN National Routes (National Cycle Routes)?</p>		
<p><b>Policy INP8: Historic and Natural Environment</b></p>	<p>1. The open space policy needs to be cross referenced to the Historic and Natural Environment proposals maps.</p> <p>INP8 a)</p> <p>2. Further definition is needed of what the town’s important and locally significant historic features and natural environmental assets are.</p> <p>3. Clarification about how new development will respect, complement, conserve and enhance would strengthen this policy.</p> <p>INP8 b)</p> <p>4. 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.</p> <p>5. 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.</p>		<p>Consider issues raised, provide further details and consider amendments to policy.</p> <p>These include a suggested 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>



Section/ Policy	Issue	Relevant National Guidance	Options/actions for potential changes
	<p>6. Evidence should be provided to justify designation of these areas.</p> <p>INP8 c)</p> <p>7. Does this refer to the important woodland identified on the map but these lie outside the NP area?</p> <p>8. 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.</p> <p>INP d)</p> <p>9. 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?</p>		