
From: Michael Craggs [mailto:mcraggs31@btinternet.com]
To: townclerk@ivybridge.gov.uk
Subject: Draft Ivybridge Neighbourhood Plan

Sent: 21 August 2015 15:01
Cc: <derekwoodward@hannick.com> 1

Dear Lesley

We act for Hannick Homes Ltd and are instructed to submit the comments on the draft Ivybridge Neighbourhood Plan as set out below.

1. Policies CS2 and CS3 of South Hams District Council's adopted Core Strategy and Proposal I1 of the adopted Ivybridge Site Allocations Development Plan Document (DPD) set out requirements for new housing and employment and allocate sites to accommodate these requirements in Ivybridge. Although the proposed Neighbourhood Plan does not contradict the adopted Development Plan (e.g. by proposing alternative locations for these requirements), it makes no mention of the allocations. In a plan which purports to set out a vision for the future of the town, this omission seems perverse. A newcomer to the town reading the plan would have no idea of the existence of a major area of proposed change and in this sense we consider the plan to be misleading.

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.

2. Policies INP5, INP6 and INP7 each refer to new development being required to contribute towards the provision of various community facilities. Policy CS8 (Infrastructure Provision) of the Core Strategy sets out a requirement for infrastructure needed to service and deliver sustainable development to be in place or provided in phase with development. It also refers to an intention to seek financial contributions towards such provision, where appropriate. As the Neighbourhood Plan is required to be read alongside the Development Plan (and to be in general conformity with strategic policies) the references in INP5 - INP7 to contributions are unnecessary.

Furthermore, by suggesting that individual development schemes will be expected to contribute to a range of wider community benefits, the wording of the policies conflicts with the Community Infrastructure Levy (CIL) provisions. South Hams District Council will, in due course, adopt CIL rates for the district and these will draw upon infrastructure planning evidence underpinning the development strategy for the area. CIL will deal with wider, non site specific infrastructure and it will continue to be possible for requirements arising specifically as a consequence of a proposed development to be dealt with under the established s.106 arrangements. The policies of the draft Neighbourhood Plan, however, suggest that s.106 agreements will be used to secure off-site benefits and this ignores CIL.

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.

3. In paragraph 4.4 of the draft Neighbourhood Plan reference is made 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 Proposal I1, and which is currently being considered by South Hams District Council, includes a site for a new medical centre. It would be appropriate for the Neighbourhood Plan to acknowledge this proposal as it constitutes a significant community facility serving the whole town and a wider hinterland.

Suggested change: Add a reference in Section 4 to the medical centre proposal as part of the I1 allocation.

Regards, Mike Craggs, Consultant, DPDS Ltd