

IVYBRIDGE TOWN COUNCIL RESPONSE TO THE EXAMINER'S QUESTIONS REGARDING THE IVYBRIDGE NEIGHBOURHOOD PLAN

July 2017

The Examiner has raised some questions (shown below in bold italics).

Succinct responses are shown in plain type below each question.

The Town Council hopes that these will assist the Examiner.

1. Policy INP6 – Housing and Employment

1a. The reason for selecting the figure of 10 or more dwellings and the evidence behind it.

10 dwellings was chosen in order to align with national guidance regarding the circumstances when contributions for affordable housing and other tariff style planning obligations should or should not be sought. It was also considered to be a reasonable number above which the policy's requirements might be reasonably negotiated. The figure is not specifically backed up by other evidence. The policy phrasing ("should") allows flexibility to negotiate the most appropriate outcome on a site by site basis. The policy is considered to meet the Basic Conditions, particularly in its reference to adopted policy.

1b. How does this policy fit with the Strategic Policies of the Development Plan?

The policy has been drafted with an eye both to the extant development plan and the emerging new local plan (the JLP). The relevant strategic policies of the extant development plan have now been confirmed by SHDC and there appears to be no conflict. The policy is drafted so that it can also fit the strategic policies of the emerging JLP. This had been long-delayed and was not published when the neighbourhood plan was prepared, consulted on and submitted, but the policy phrasing ("to meet adopted policy") aims to allow a fit with both the old and the new plans.

1c. How the policy is intended to be implemented - what is the level of mixed use, affordable housing etc that will be required for such developments and how has viability and deliverability been taken into consideration?

The plan has been prepared with an eye to keeping the process proportionate to the task. The amount of evidence necessary to support specific targets would have been considerable and the matters addressed by this policy were not considered to merit such a detailed approach. Rather, the policy aims to require "provision" of those things which can help to make Ivybridge a more balanced, healthy and self-sufficient community. The policy was deliberately left without precise targets, aiming to allow scope for these to be negotiated as appropriate on a site by site basis and in line with any relevant policies of the emerging JLP ("at least to meet adopted policy").

1d. As Lifetime Home Standards are no longer used as a measure within the planning system how does this element of the policy meet the Basic Conditions.

If necessary in order to meet the Basic Conditions this element of the policy should be deleted.

2. Policy INP7 – Traffic and Movement

2a. Having considered the Devon County Council comments with regard to this policy how does it meet the Basic Conditions?

The plan is constrained in that many of the measures and solutions required to address local traffic issues fall outside the plan area. The policy has been carefully written to overcome this difficulty and to remain in line with the Basic Conditions. It does not propose specific traffic measures but requires that development contribute towards a study to recommend an holistic way forward. Thus it is considered that the policy meets the Basic Conditions, having regard to national policies and advice, contributing to achieving sustainable development, generally conforming with the

strategic policies of the development plan and being compatible with EU obligations.

Following receipt of initial representations on this policy the neighbourhood plan group met Devon County Council to explore and explain its content. The County Council's comments suggested that they had not clearly understood what the policy did and did not require, and at the meeting this was shown to be the case. The County Council's supplementary representation reflects an improved understanding of the policy.

The County Council initially considered the policy to be unaffordable and undeliverable. Their supplementary representation stated that without significant new development proposals they would not provide funds for such a study. The traffic problems in Ivybridge have prevailed for decades and the idea for a southern relief road was first put forward in the early 1980s. Since then the situation has become much more severe and the Town Council considers that the policy provides a good way forward.

The timing and phasing concerns raised by the County Council have been addressed and the policy is no longer time constrained. Their concern that development should contribute towards both the study and the design and delivery of its recommended solution are not accepted. Development is usually required to provide for the traffic requirements associated with it and this is no different.

It is relevant to note that the Town Council and Neighbourhood Plan Group have objected to the emerging JLP proposals for Ivybridge, pressing for land to be allocated south of the A38 (including a relief road) rather than to the east of the town. That representation on the JLP is relevant.

2b. How would the level of contribution be determined and is the intention that it would be required from all sizes of development?

The level of contribution was not set in policy and should be a matter of negotiation. Neither were any thresholds set as to size (or nature) of development. Should the Examiner feel these to be necessary then, in line with Policy INP6, 10 dwellings would seem to be a reasonable size above which to require contribution.

2c. Was consideration given to including a policy relating to air quality?

The policy includes reference to air quality as one of the matters to be addressed by the required study. However, in view of the seriousness of the matter in Western Road in particular, there may be scope to improve and strengthen the plan by including an element of policy more specifically geared to improving air quality. If the Examiner considers this could or should be done that would be welcomed.

3. Policy INP 8 – Historic and Natural Environment; paragraph (b):

3a. Please can you clarify the intention of this policy and explain how it meets the Basic Conditions.

3b. What is the evidence base for the selected woodlands and open spaces?

3c. Was consideration given seek Local Green Space Designation for the areas?

The intention is simply to protect and enhance woodlands and open spaces and it is considered that the policy accordingly meets the Basic Conditions. The Town Council was not minded to identify Local Green Spaces, preferring to focus the plan on regeneration and inward investment.

The woodlands are those considered by the Town Council to be most significant to the town's setting; however, all are outside the plan area (hence the map is "for information only"). All public open spaces and sports grounds are shown on the same map. This is based on local views and knowledge, particularly from the Town Council and the Sports Group, and the result of local consultation.