

Ivybridge Neighbourhood Plan

SHDC comments on Reg 17 plan

The Council is satisfied that the Ivybridge Neighbourhood Plan (INP) is in broad conformity with both the strategic policies of the adopted Local Plan and with the National Planning Policy Framework (NPPF), and therefore supports its submission for examination. Some areas of minor concern are set out below.

Detailed comments were made by the Council on the Regulation 14 version of the INP, and the Neighbourhood Plan Group have agreed with the majority of these and accordingly made the suggested changes to the INP.

Since these comments were made, the situation has changed in regard to the Development Plan for the District. The adopted Development Plan remains the South Hams Local Development Framework, in particular the Core Strategy 2006. However, some of the policies in the Core Strategy are now considered out of date: where this is the case, the NPPF will take precedence. The Council has set out a list of policies considered to be Strategic Development Plan policies which the Ivybridge Neighbourhood Plan is expected to be in conformity with. This list is attached as an appendix below.

Also relevant is the emerging Plymouth and South West Devon Joint Local Plan (JLP), which has now completed Regulation 19 and is expected to be submitted for examination at the end of July 2017. While neighbourhood plans cannot reference emerging Local Development Plans, it is sensible for them to have regard to any strategic policy that is likely to be adopted within the neighbourhood plan period, in order to ensure that the neighbourhood plan does not become out of date very quickly.

The Council considers that, while some concerns remain as stated below, the INP is not in conflict with the strategic priorities and objectives set out in the JLP.

The Council's chief area of remaining concern, is that by not identifying and allocating suitable housing sites in addition to the identified mixed-use brownfield sites, the INP misses an opportunity to make positive provision for local housing needs and to influence housing development that is likely to come forward over the plan period. However, the Council accepts the Neighbourhood Plan Group's position that the key focus of the current INP is on the regeneration of the town centre. This aspiration is in conformity with the

adopted Development Plan. Sufficient development is likely to come forward within the Neighbourhood Plan Area under existing and emerging Local Development Plan policies to meet both local and strategic housing needs. Given that the INP does not seek to stifle future housing development, the lack of housing site allocations is not considered to put it in conflict with either the Local Development Plan, the NPPF, or the emerging JLP.

Comments remaining on specific policies are as follows:

INP1:

1. This policy accords with the regeneration proposals set out in the Ivybridge Site Allocations DPD 2011.
2. However, justification should be provided for the difference between the Town Centre Area shown on the INP proposals map and the Ivybridge Central Area as shown on the adopted proposals map in the Ivybridge Site Allocations DPD.
3. Detail should be provided on how the level of contributions expected from development will be decided.

INP6:

1. While this policy is not considered to be in conflict with existing strategic Development Plan Policy, the Council would prefer to see more detail and clarity in line with the following comments.
2. In the main towns, JLP policy DEV8 requires developments of 11 or more houses to provide 30% affordable housing on-site.
3. While the principle of mixed use development is supported by the Council, there is no requirement in existing or emerging Strategic Development Plan Policy for development to contribute towards the provision of employment use, offices or work space. If this is required by the INP, more clarity should be provided on the type and amount of mixed use development required. In addition, evidence should be provided that the requirement meets viability tests and will not stifle development of the size suggested by the policy.
4. The Lifetimes Homes standard is no longer in use and development is expected to meet the requirements of Building Regulations only. The policy wording should be amended to reflect this.

INP7:

1. The aspiration to improve transport in and around Ivybridge is supported by strategic policies in the emerging JLP, particularly SPT8, SPT9 and SPT10.
2. More detail should be included on what size development is expected to provide a contribution, how the level of this will be decided, and whether it would impact on viability.
3. An Air Quality Action Plan is in preparation for the Ivybridge Air Quality Management Area. This has not yet been published, but is expected in the near future. The INP could usefully make reference to this document.
4. Please see the comments made on this policy in the SEA Screening Report.

INP8:

1. INP8 a). While this requirement is not considered to be in conflict with the Development Plan or with the NPPF, it is unclear what it adds to existing and emerging policy, particularly Core Strategy Policy CS9, DPD6 and JLP Policies DEV21 and DEV22. The INP could usefully identify historic assets of importance to the local community that do not already have any designation, in order to add local detail to JLP policy.
2. IN8P b). It is unclear if this part of the policy is intended to provide designations. If so, the appropriate designation would be Local Green Space and these should be clearly identified on the proposals map and evidence provided that they meet the criteria set out in Paragraph 77 of the NPPF.
3. INP8 c). It is unclear what this adds to existing and emerging Development Plan policy, particularly Core Strategy Policy CS10, DPD5 and JLP Policy DEV28.

MG19/07/17

Appendix 1



South Hams District Council

Development Plan Strategic Policies July 2017

(Ivybridge Neighbourhood Plan Examination)

The extant Development Plan for South Hams District as at July 2017 comprises the following documents:

- 2006 Core Strategy including saved policies from the 1996 Local Plan
- 2007 Sherford New Community Area Action Plan (AAP)
- 2008 Affordable Housing Development Plan Document (DPD)
- 2010 Development Policies Development Plan Document (DPD)
- 2011 Site Allocations Development Plan Document (DPD) for:
 - Dartmouth
 - Ivybridge
 - Kingsbridge
 - Totnes
 - Rural Areas

The Council considers the following policies relevant as strategic policies with which the Ivybridge Neighbourhood Plan should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given.

Policies that the Council considers the Ivybridge Neighbourhood Plan should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity required?	Notes
Core Strategy 2006		
CS1, Location of Development	Y	Not in full conformity with NPPF; however, NPs should have regard to CS1 as it gives an indication of which settlements are considered sustainable by the Council. NPPF Paras 14-15 are also relevant ('Presumption in favour of sustainable development').
CS2, Housing numbers	N	Out of date. Not in conformity with NPPF – relevant section: 6. Delivering a wide choice of high quality homes. JLP evidence is relevant.
CS3, Employment land provision	Y	Compliance required though NPs may add detail
CS4, Sherford New Community	N	Not relevant to Ivybridge NP
CS5, Previously developed land	Y	NPPF 111 permits local targets. No new evidence to suggest a different target, however, the Council suggests flexibility on the 50% figure.
CS6, Affordable Housing	N	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant. New JLP evidence suggests 30%
CS7, Design	Y	Sets out broad design parameters. NPs may add local detail. DPD1 is relevant.
CS8, Infrastructure provision	Y	NPs may add local detail.
CS9, Landscape and historic environment	Y	In broad conformity with NPPF. NPs may add local detail. DPD2 and DPD5 are relevant.

CS10, Nature conservation	Y	DPD5 is relevant.
CS11, Climate change	Y	In broad conformity with NPPF. NPs may add local detail.
CS12 Tourism	N	NPPF does not advocate a sequential approach for tourism related development. Relevant NPPF sections: 1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy
CS13, Rural diversification	N	Not in full conformity with NPPF. NPPF Para 28 takes precedence.
Development Policies DPD		
DPD7, Transport, access and parking	Y	
DPD8, Open space, sport and recreation	Y	
DP11, Housing mix and tenure	Y	
Site Allocations DPD		
Proposal I1 – East of Ivybridge	Y	This is considered a strategic site. The Ivybridge Neighbourhood Plan should have regard to this proposal, although the site is outside the Neighbourhood Area.
Proposal I2 – Ivybridge Central Area	Y	Considered strategic and relates to the NP Area.