

Schedule of Responses to Regulation 16 Consultation

SEA and HRA screening suggested changes

Ivybridge Neighbourhood Plan was submitted to South Hams District Council on 14/10/16. The Council consulted on the submitted plan for a six week period between 01/12/16 – 12/01/17 in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations.

The tables below set out the representations on the Ivybridge Neighbourhood Plan made in response to consultation at Regulation 16, and the changes to the plan suggested by the Strategic Environmental Assessment and Habitats Regulation Assessment screening report.

TABLE 1 Responses to Regulation 16 Consultation

Representation
1. Ian Smith
<p>My comments below are from my perspective as a resident in the Ugborough NDP area adjoining the Ivybridge NDP area.</p> <p>a) I am pleased to see the emphasis on improving environmental standards and protection, including increasing biodiversity (p 16).</p> <p>b) The emphasis on transport and movement in the plan seems to me to be very necessary. I suggest including rail travel in the Transport and Movement section (p 12). I am pleased to see that rail travel features in section 3.4 More Sustainable Travel and Movement (p 15) and section 4.19 (p 23). Rail transport to and from Ivybridge railway station is essential for my livelihood and I know that I am not alone in this.</p> <p>c) Returning to Transport and Movement (p 12), I understand and sympathise with the need for improved road access in and around Ivybridge, especially on to and off of the A38 Devon Expressway. I suggest that improving and extending the eastbound on-slip at Wrangaton needs to be an essential part of this, especially in light of the imminent eastern expansion of Ivybridge. In my opinion and experience the slip road at Wrangaton is currently dangerously short. A similar problem in Plymouth at the Manadon interchange there was recently rectified very successfully.</p> <p>d) Remaining on the transport theme, I am surprised that the proposed new link road routes in the Ugborough NDP area south of Ivybridge, as indicated in the plan (p 25) any additional development potentially associated with these, do not seem to have featured in the Ugborough NDP consultations in which I have participated.</p>
2. Tony Barber
PERSONAL COMMENTS

Please note that these are personal comments and do not necessarily reflect the views of any local organizations of which I am a member. I have been a resident of Ivybridge for more than 40 years and at various times have served as town councilor, town mayor and district councilor. These comments are on the submission version of the neighbourhood plan as available for consultation from December 2016. They are presented as (a) comments on process and evidence base (b) comments on some particular proposals referred to in the document.

COMMENTS ON PROCESS

The plan has been a long time in being prepared from the 2011 “Front Runner” proposals until the present. I understand that one of the given reasons for this was uncertainty over proposals for the leisure centre and the link between the SHDC local plan and the neighbourhood plan.

The membership of the Steering Group for the plan was, presumably, based on trying to arrange a diversity of interests and representation but it is not clear how this was first derived. It does seem, however, to have had five county/district councilors on it but not the same proportion of town/parish councilors from the two parishes involved as well as the non-councillor members. This is in no way to denigrate the work of those involved in it nor that of its chairman nor of the very professional presentation of the plan, presumably heavily derived from the hard work of Mr Bray. The use of the Focus Groups to concentrate on specific areas was a valuable one although they seem not to have met very often in the later stages of the process when one might have anticipated their input during drafting of the final document.

Evidence:

Although the evidence base is given in the Appendix, one assumes that this was the basis for the specific proposals contained in the report itself. It would have been interesting and informative to know in more specific detail how this was used to justify specific aspects which otherwise seem to have no particular context such as that of a medical centre in the leisure centre general area.

Documentary

The “community based evidence” is of a somewhat disparate nature. The Princes Foundation plans were prepared over a short space of time with very limited background data such as environmental and traffic assessments, land ownership, etc. Although the proposals were subject to a consultation questionnaire this was not done on a systematic basis nor were there a large number of respondents (? less than 100). Nevertheless, the report formed a valuable, non-statutory, basis for further thought although there were views in some quarters that, in some way, the ideas were “set in stone”. A whole range of issues were discussed at various times by the, now defunct, town team which, again, could inform discussion, although, apart from the Retail Study the ideas had limited quantitative basis. Sports and Leisure remains an ongoing and important issue with the local sports organizations although, again, sometimes with limited quantitative data. The Burrington Estates plans were part of the normal planning application process. In relation to the Ivybridge Town Council website and the Community and Visitor Resource Site it would be interesting to know how many “hits” each received in relation to local and neighbourhood planning.

As far as most of the cited reports from SHDC, DCC and other sources are concerned, the information/data has been prepared as part of their statutory duties, mostly on a wider basis but with varying degrees of public input. They form part of the context within which the neighbourhood plan is prepared and no doubt will have been fully consulted by the planning consultant if not necessarily in detail by all members of the group. Two specific Ivybridge focused SHDC documents are the Retail Study, initially proposed and largely funded by SHDC and the Stowford Mill Planning Brief prepared at request of local district councilors because of the importance of the site and concerns about its future.

What we do not seem to have are any historical/archaeological, environmental/topographical or biodiversity assessments of the area especially those proposed for development nor the identification of potential drainage problems. There have been a number of localized flooding issues on already developed areas of new housing, notably in the western part of the town.

Primary Data from Surveys, etc.

The Princes Foundation survey did collect some questionnaire responses (see above) and subsequently there have been various workshops at various times and places such as the Filham Funday. I do not recall many information and response stalls being set up in the town centre (Fore Street or Glanvilles Mill) to catch local people however. It can be suggested that much of the evidence collected is anecdotal rather than gathered systematically. In the summer of 2015 leaflets were delivered to all houses in the parish and a community questionnaire was issued. It would be interesting to be aware of both the response rate and the conclusions drawn from this. Unfortunately the questionnaire was not as discriminatory as it might have been, even allowing for the fact that only a proportion of the community would be prepared to complete it. Each of the 7 questions INP1 – INP7 included between 2 and 5 proposals and the first four also referred to “associated improvements” without specifying what these might be. It may well be that some respondents might favour some of the sub-sections of a particular question but we had to take “all or none” and the emphasis did seem to be on acceptance although there was an opportunity for comment (see Appendix). Respondents were not asked to prioritise issues.

Are there groups in the community that might have been missed out?

Other data which, one assumes, ought to have been collected by the team, and presumably may have been, would have included identification of the aspirations and present and future needs of very specific groups using directly focussed consultations including with children / young people / young adults (future users of services), the disabled (especially given the presence of Dame Hannah Rogers School here and of other disabled people) and elderly people (increasingly important given current demographic trends). Although the Retail Study provides a valuable base study, can one assume that local businesses have been also consulted directly and/or via their organizations such as the Chamber of Commerce? There are also a large number of voluntary organizations in the town and it would have been helpful to have known they have been consulted e.g. by e-mail. A list of such organizations consulted, including sports groups could have been included in another appendix as evidence of their involvement.

COMMENTS ON CERTAIN PROPOSALS

Overall the plan contains a valuable set of ideas although so much of the town centre plans depend upon funding, land ownership and planning policies and constraints whilst the “outlying areas” where there has been or is to be new development could probably have benefited from more thought.

Policy INP: 1 Town centre regeneration

There is little dispute that town centre regeneration is desirable as it is in many “high streets”, as much as anything because of changes in shopping habits. The

western entrance to Fore Street is not welcoming and the street itself, although there has been useful improvement in providing memorial seating, etc. could do with a “facelift” but traders are having a difficult time as reflected in the number of charity shops.

A much better link between Glanville’s Mill and Fore Street is needed (raised by town team) and tidying up of street furniture. The planters, which one assumes are there to reduce parking on pavements resemble nothing so much as giant litter bins. In an ideal situation, one would welcome complete

pedestrianisation but this is not practicable given the needs of street residents, disabled people, deliveries and picking up/drop off of heavy/bulky items, etc. being provided for. Nevertheless enforcement of parking restrictions and control of driving/parking on pavements (including by delivery vehicles) could certainly improve the pedestrian environment.

The proposal to reverse traffic flow in Fore Street derives from the Princes Foundation study, the idea being that The Beacon would form a backdrop when looking/driving up the street eastward. Attractive as this idea is, there would be quite a cost involved and the traffic situation around the war memorial area would need sorting. The, apparently simplistic, response from a motorist could well be "I am concentrating on the road and the edges of the pavements rather than looking at the scenery".

Other than this comment on the first of the proposals, the rest of the suggestions seem good ideas although how a town square at the east end of Fore Street would fit in is not clear and one also has to ask whether any squares are pedestrian or car parks?

Attracting people to towns and town centres is about the "offer" rather than anything else and this is clearly linked to the "busyness" of the street.

Policy INP 2: Town Centre land east of the River Erme.

It is often said that the river is a hidden asset to the town and proposals to open it up further are welcome. Also the open space south of the present Leisure Centre enhances the location. On the premise that the leisure centre provision should remain in the centre of the town as, hopefully, it is one of the features that will draw people into Ivybridge. However, redevelopment "including new leisure and medical centres coupled with a hotel, restaurant offices.." seems to open up all sorts of possibilities.

1. Policy INP 8 states that woodlands and open spaces will be kept free from development other than that which is directly associated with their management, maintenance and enhancement". Would suggested possibilities "with no loss of public car parking capacity" (INP 2g) not result in loss of green space?
2. Plans for a new medical centre on the south side of Exeter Road were included in proposals for development on the east side of the town. This site is directly on a bus route (would need a crossing) and, as I recall would include provision for parking. On the assumption that this is now replaced by a medical centre on the east bank it should be noted that (a) it is less directly and conveniently on a bus route and (b) that parking will be required either through new parking sites or the use of existing ones. Or is this an additional medical facility with appropriate justification? Note that there has recently been suggestions that the Thursday market in the town centre should be relocated to make car parking spaces available and hence, it is said, assist local businesses. Medical facilities in the town centre are appreciated by local residents especially older people but a site on the east bank of the river will probably be less convenient than the current one in Station Road
3. A hotel will necessarily require nearby parking facilities either by providing more parking spaces or using existing ones with payment either directly by customers (never appreciated) or by the hotel management. A restaurant to service the hotel is virtually essential.
4. More traffic movement will be generated by suggested developments.

Policy INP 3: Glanville's Mill Site

1. Obviously this depends upon matching the demands of the site owners at the time with the aspirations of the community. At the present time, apart from empty shops, we have three charity shops, a funeral director and estate agents along small businesses here who sometimes seem to be struggling to survive despite strenuous efforts.
2. Improved relationship to river certainly desirable. Some steps were taken by previous owner; more needs to be done.

3. Enhancement of links to Fore Street needed

4. As with Fore Street, access for elderly and disabled needs to be a priority in any future plans.

Policy INP 4: North of Fore Street

This is a line of 19th and early 20th shops characteristic of the town and in accordance with policy INP 8 one would hope that these would not all be demolished by development to give the faceless character of so many modern developments but that the ground floors would continue to provide locations for a range of local businesses and services who will thrive whilst conserving the character of this “high street” – similar comments apply to the south side as well.

Policy INP 5: Community Facilities

These proposals are to be welcomed, including those for creative arts and young people. Many sports clubs suffer from lack of any/appropriate/adequate indoor/training facilities. Consideration should also be given to such things as a “drop in centre” for older people and the retention and enhancement of the library should be a priority. Creative solutions to the issues of dual use of sports and other facilities in local schools bearing in mind their own heavy usage of them.

Policy INP 6: Housing and Employment

Although developments which include employment provision has for some time been the “flavour of the month” these are not necessarily desirable for either businesses or residents. However it is essential that all developments should include a levy of some sort for providing business opportunities, possibly in another part of the Ivybridge area where access and parking will not be so much of a problem. There is a need for both “starter units” and “growing units” for small businesses to progress to without being forced to move to Plymouth. Travel needs for those employed outside the immediate town centre e.g. at Lee Mill or Wrangaton need to be addressed. Clearly all dwellings will be required to meet certain government standards but developers should be encouraged enhance these as far as possible in relation to insulation and possible home energy generation systems.

Policy INP 7: Traffic and Movement

1. A traffic and transport study on its own will not solve all the problems and investment in traffic infrastructure is needed especially as the signals are not favourable in relation to another A38 access. Consideration needs to be given to a reconfiguration of the A38 access at Wrangaton to permit entry and westward progression from the east of Ivybridge / Bittaford & Wrangaton with a similar exit for east travelling traffic. Apparently this was actually raised when the proposals for the upgrading of the A38 / Ivybridge bypass was originally discussed.

2. There is certainly a need to promote an alternative access to the A38 junction at Westover and the only logical solution would seem to be via a new line south of the A38 or massive improvement of roads in that triangle. However, the price of this should not be to allow housing development south of the A38 down the Erme Valley where there are no obvious natural boundaries to growth.

3. The Community College continues to expand and twice a day the town is subject to lines of coaches whilst at the same time students cannot cycle to school. It seems sensible, given the limits on sports provision expansion there, that growth in numbers should be contained and consideration be given to students along and with access to the A379, instead of being bussed to Ivybridge attending schools in Plymstock. Similarly with Sherford and Plympton.

4. I would commend the need for adequate and safe cycle and foot paths in all areas of the town.

Policy INP 8: Historic and Natural Environment

1. These policies are to be welcomed and the whole natural and historic environment of the town be promoted, including by working together of voluntary community groups and the various councils working for the promotion and enhancement of open spaces, river-banks, woodland, footpaths, etc. (and sports facilities).
2. The outstanding local environment of the river, Longtimber and Pithill Woods, access to Dartmoor NP, footpaths and cycle paths is a major “selling point for the town” which is not promoted enough. N.B. Page 27: The map shows town council woodland above the viaduct on both sides of the River Erme. Is this correct or a preparation error as the purchase of Longtimber and Pithill Woods related only to the western side of the valley?

Appendix B: MONITORING FRAMEWORK

This is a valuable topic to have been included. However, if monitoring is to be meaningful it must::

- a. Have baseline data against which comparisons can be made
- b. Both baseline and subsequent data needs to be both systematic and quantitative and clearly comparative on an ongoing basis.
- c. Targets against which data collected may be evaluated are presumably needed.
- d. Data collection and evaluation needs to be seen to be “professional” and independent of developers, etc.
- e. There needs to be a clearly defined responsibility for ensuring that monitoring data is collected and evaluated given that this will come from a variety of sources. Since this is a neighbourhood plan, then it would be reasonable to assume that the “community” working through the town council would have this co-ordination role.

N.B. Data collection needs to be appropriately managed and may well involve cost. As an instance “enhancing biodiversity” will need to be monitored by an appropriate consultant with clear ideas as to which aspect of biodiversity is to be monitored by “records of species”. Does this include birds & mammals, other vertebrates, insects & other invertebrates, flowering plants & ferns, mosses & lichens? There are consultancies that do this sort of work but frequently they are concerned with protected species (such as bats & birds) and habitats rather than biodiversity as such. Local authorities have responsibilities in relation to biodiversity.

3. PL:21 Transition Initiative Committee

PL:21 welcomes the opportunity to engage with the Ivybridge Neighbourhood Plan and has encouraged its contact list of over 240 local people to contribute to the current consultation.

The PL:21 steering group (9 local people) discussed the plan in an email group of all members. The key points to come out of these discussions are raised and presented below. We hope they are of interest and use to the Neighbourhood Planning Team.

Wider Area

We respond to the specific proposals raised in the Plan and we have considered the following:

- The need for sustainability to be at the heart of new developments to ensure the growing population of Ivybridge does not detrimentally effect the local environment or the quality of life of those living in Ivybridge.

- Insufficient physical activity is widely acknowledged as a key public health concern and an area where Neighbourhood plans can make an enormous difference and improvement to health and well-being of the local population.
- Adverse affects of exhaust fumes where the main threats are air quality damaging to people’s health.
- Has the Plan properly consulted with the schools, children, young people, disabled people and older people?
- Traffic and traffic movement as clauses 4.18 – 4.21 of the Plan

Sustainable Transport

The medical profession is informing planning authorities that the way we travel has a direct impact on our health and lifestyles. It further highlights the costs to us in human health and the enormous financial burden to the public purse, especially the NHS if we continue to rely solely on cars. We believe the way forward for growth is to follow the Nordic examples where local authorities’ plans provide for all forms of transport

Improving access to rail services Ivybridge has a main line train station that is capable of significant growth for local people. We ask that the Plan allows that it could be part of a rapid rail transport system in the future as well as growth from more main line trains stopping.

Ensuring improved and accessible bus transport Because of its good road network, we ask that both short distance and long distance buses are catered for. This could be accomplished by increased space for bus stops in the town centre so that the town can act as a local hub. There should be an easy bus connection to the train station.

Developing and encouraging cycling The existing National Cycle Network Route 2 has excellent links for short journeys to the train station, work, school and leisure however it needs attention within the town as it is perceived as too dangerous, e.g. Community College bans cycling because the roads are too dangerous. Cycling and walking for shorter journeys are highlighted by the medical profession as important for human health. The town requires a cycle route plan where paths are wide, typically 3 metres, so as to cater for pedestrians and disabled people as well as less confident cyclists. We support the Plan with clause 4.20 that an integrated travel plan is urgently required. We however ask that the appointed engineer is fully experienced and conversant with sustainable transport and the brief includes travel planning beyond Ivybridge, especially towards Plymouth. We have prepared our own plans as part of the neighbourhood planning process and are submitting them to Devon County Highways Dept in accordance with its request

Town Centre Redevelopment

In addition to the Plan’s proposals, we ask to include some additions. We ask for an enhanced square where people, especially families can feel safe and freely mingle and socialise. We further ask that there is adequate provision of cycle parking conveniently located for businesses, shops and the leisure hub.

Environmental Objectives

We believe that the Nordic example should be followed too for environmental objectives and that the Plan supports initiatives that generate energy from Ivybridge's natural resources. We welcome sections 4.15 and 4.16 related to the quality of new housing. Locally the River Erme offers significant potential for renewable energy. We ask that a new clause 4.25 is added. “The Plan supports efforts to harness the power of the River Erme for energy generation that respects the historic features and local ecology.”

4. David Stuart, Historic England

Other than providing initial generic advice at the time the Plan area was designated we have had no involvement in the preparation of this Plan. This is therefore our first opportunity to appreciate the community's ambitions and aspirations and to offer advice on the possible historic environment implications associated with them.

We note from the documents on your website and on that of the Town Council that there is an extensive array of reports which have been used to inform the Plan. Many of these are self-contained exercises investigating the feasibility of, and designing, schemes or concepts of positive change on various sites and the Plan appears to have effectively embraced those proposals, relying on the integrity of their source for demonstrating compliance with the necessary local and national planning policy considerations.

The focus of our attention is the agenda for the town centre as represented in policies INP1 – 4. The Plan sets out in these policies and in supporting text on page 18 what it wishes to achieve but does not explicitly reference the evidence or rationale which has been used to underpin the basis for what is being promoted. These policies advocate what is intended to be transformative change and development within the heart of the town which could well generate impact on the significance of relevant designated heritage assets.

No doubt sufficient assessment of the potential for impact on such assets was undertaken in the development of these policies to ensure that any impact will be positive. We note from the draft June 2015 Sustainability Appraisal that this attributes positive impacts against objectives for the protection and enhancement of the historic environment although the nature of the assessment methodology is not made clear.

At this advanced stage in the Plan-making process we are conscious of the undesirability of introducing issues which may have the effect of upsetting what would otherwise be its smooth progress towards being made. We are aware too in highlighting the need to demonstrate that appropriate evidence should exist to show compliance with the historic environment provisions of the National Planning Policy Framework (NPPF) that this requirement has no doubt already been adequately addressed but is accommodated within layers of supporting information. The short timeframe for making comments on the Plan and its coincidence with the Christmas break are, especially when coupled with our absence of previous involvement, unfortunately not conducive to facilitating an understanding of the Plan and its genesis in full.

In the circumstances we must therefore defer to your authority in its assessment of the Plan and its demonstration of broad conformity, relying on it to ensure that the necessary statutory heritage considerations have been adequately accommodated, utilising its own in house conservation expertise as appropriate.

5. Natural England

We welcome the inclusion of promotion of biodiversity in Policy INP8 in relation to the management of woodland and open spaces. Specific examples of how this can be achieved in a local context would enhance the plan.

6. Persimmon Homes
See Appendix 1 p.13
7. Highways England
See Appendix 2 p. 19

TABLE 2 SEA and HRA Screening Report Recommendations

Recommendations	
<p>SEA:</p> <p>Of the policies and proposals contained within the draft INP, policy INP7 and the associated proposals map make reference to road improvements that fall outside the designate neighbourhood plan for Ivybridge. As such, these policies cannot be assessed as they do not fall within the designated area, and should not be contained in the final draft of the INP.</p>	<p>Summary of response from Ivybridge NP Group:</p> <p>Policy INP7 is very carefully worded to avoid the pitfall the SEA screening refers to. It neither proposes nor requires any specified highway or transport proposals. It only proposes a study of the traffic issues and requires that study to recommend solutions. New development is required to contribute towards the study and delivery of its recommended solutions. We are painfully aware that the likely solutions will almost certainly require measures outside the plan area (and it's a very great shame that the Ivybridge neighbourhood plan area wasn't drawn wide enough to enable fuller consideration of such matters) but it's for that reason the policy is so very carefully worded and specifically does NOT include any proposals outside the plan area. Even the reference to a relief road doesn't specify its route being south of the A38. The accompanying map is clearly labelled "for information only" - it is not the proposals map or a part of the proposals map. If future highway measures are required outside the Ivybridge NP area then they will have to be brought forward under the provisions of the JLP and/or other neighbourhood plans, or simply through planning application.</p> <p>A very minor change that would be acceptable would be to add the word "possible" to the description of the alternative routes for the new link road in the key to the Transportation Map.</p>

<p>HRA:</p> <p>Reflecting the HRA of the Joint Local Plan, the Ivybridge NP should include reference to the requirement for development in Ivybridge to contribute towards mitigating the recreational impacts of new residents from development on the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA.</p> <p>Policy STP13 of the Joint Local Plan states:</p> <p>European Protected Sites – mitigation of recreational impacts from development.</p> <p>Mitigation measures for recreational impacts on European Sites will be required where development is proposed within the identified zones of influence around those European Sites that are vulnerable to adverse recreational impacts. Residential development, student and tourist accommodation within these zones of influence will be required to provide for appropriate management, mitigation and monitoring on site, and / or financial contributions towards off site mitigation and management. This will need to be agreed and secured prior to approval of the development. Mitigation measures will include:</p> <ol style="list-style-type: none"> 1. On site access and management. 2. Off-site provision of suitable alternative recreational facilities <p>The detail of the Zone of Influence (within which Ivybridge will fall), and financial contributions through planning obligations will be defined in the forthcoming Supplementary Planning Documents in support of the Joint Local</p>	<p>Suggested change to plan agreed with Ivybridge NP Group:</p> <p><i>Insert following paragraph 4.24:</i></p> <p><i>4.25 All residential development in Ivybridge must contribute towards mitigating the recreational impacts of new residents on the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA as set out in Policy STP13 of the Joint Local Plan.</i></p>
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<p>Plan. Using evidence from the Plymouth Sound and Tamar Estuaries Recreation Study (Marine Biological Association, 2017), a single mitigation strategy will identify the interventions required and the SPD will then set out the charge that will be applied to all new dwellings and tourist developments within a 'Zone of Charging' as set out in Policy SPT13 '<i>European Protected Sites – mitigation of recreational impacts from development</i>'.</p>	
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Appendix 1: Persimmon Homes



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Our Ref: JG

11 January, 2017

27 JAN 2017

Neighbourhood Planning
South Hams District Council
Follaton House
Plymouth Road
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TQ9 5NE

Dear Sir/Madam,

RE: IVYBRIDGE NEIGHBOURHOOD PLAN PROPOSAL

On behalf of Persimmon Homes South West, I would like to take this opportunity to submit comments relating to the proposed Neighbourhood Plan submission prepared by Ivybridge Town Council. The Company formally objects to the Neighbourhood Plan in its current form, primarily due to potential inaccuracy, an outdated evidence base and the submission being premature to an emerging Joint Local Plan.

The purpose of a Neighbourhood Plan is to apply the detailed and localised policy following from a strategic higher order policy as set out within an overarching Local Plan (in this case the South Hams Local Plan). Neighbourhood Plans cannot introduce or be in anyway contrary to existing policy but can provide additional clarity, allocation and land use guidance.

A Neighbourhood Plan should only be adopted when the overarching Authority wide policies on which it acts and applies are up to date and sound. In the case of South Hams the Planning Authority cannot demonstrate an up to date five year housing land supply, which is acknowledged by the Council. It is considered that at this time the supply is between 2.5 – 3 years. In such an event the National Planning Policy Framework (NPPF) is clear in determining the Local Plan "silent" in respect of housing – the principles of sustainable development therefore apply.

It is on this basis Persimmon has grave concerns with the preparation of a Neighbourhood Plan under the existing policy of the adopted plan. In recent history there have been a number of appeal decisions (and local decisions) that have reconfirmed South Hams unable to maintain an up to date land supply. Accordingly, the allocations and policy as set out within the Local Plan in respect of housing development are considered inadequate. As a consequence any Neighbourhood Plan which has been prepared and adopted under its policy provisions must also be considered equally unsound and "silent".

Persimmon is aware that the initial stages of the Local Plan Review (Plymouth and South West Devon 2011-2034) is underway. It is anticipated that this emerging Local Plan will address comprehensively the short fallings in the Authorities housing delivery and allocate additional sites to make up this deficit. Ivybridge is a primary settlement in that it has the primary core

services to accommodate substantial future growth. As such Persimmon Homes would endorse the future allocation of additional housing in sustainable locations within the settlement. Until such time as the Local Plan review has consulted, examined and been adopted, the Neighbourhood Plan for Ivybridge should be suspended. This supports fully the principle of a Neighbourhood Plan but only under an adopted and up to date Local Plan which has been found sound at Examination.

The Company does however support many of the overarching principles and objectives outlined within the Neighbourhood Plan which adhere to national and local policy; however the purpose of a Neighbourhood Plan has only been partly met. The Plan clearly advocates growth with a specific focus on the Town Centre, and acknowledges the possibility of future development not being limited to within the settlement boundary - there is recognition that planned and future growth should not be restrained, which the Company supports. However, there is a distinct lack of focus within the proposed Neighbourhood Plan on housing development and delivery within the settlement boundary to meet the current and future need of Ivybridge.

Part of the role and function of a Neighbourhood Plan is to shape the local area by identifying potential areas of growth. Currently the proposed Neighbourhood Plan does not entirely meet objectives within the Thriving Towns and Village document which suggests 'that in the first instance the Joint Local Plan will not make allocations. The intention is to allow the scope and opportunity for Neighbourhood Plans to take up this role under the powers and funding being made available'. The proposed Neighbourhood Plan details growth within and north of the town centre, however does little to tackle the greater future housing needs of Ivybridge.

Since the adoption of the Ivybridge Site Allocations DPD (February 2011), housing delivery numbers have fallen behind predicted targets, and many of the sites allocated within the DPD have not progressed. This has contributed to South Hams being unable to demonstrate and maintain a 5 year housing land supply as stated previously, and the settlement being unable to accommodate growth. The current situation differs from that of 5 years ago and should be reflected within the Neighbourhood Plan. The anticipated housing number requirement to be issued within the forthcoming Joint Local Plan is anticipated to be higher than previously adopted policy; therefore additional sites need to come forward within the plan period.

The crux of this representation is that the Neighbourhood Plan is premature and should be postponed and re-evaluated based on emerging policy. The Plymouth and South West Devon Joint Local Plan is currently being prepared, with an anticipated published version to be available in February 2017 and adoption in autumn 2017. Consultation has recently concluded on the Thriving Towns and Villages document as well as a call for sites, both of which form part of the evidence base of the Joint Local Plan. Within the Thriving Towns and Villages document the relationship between Neighbourhood Plans within the region and the Joint Local Plan is described as follows 'Neighbourhood Plans shape their local areas and can include policies and land allocations to support locally appropriate growth. They cannot plan for less growth than required in the Joint Local Plan – but can help significantly in shaping where that growth should be'. In its current form the Neighbourhood Plan risks potential inaccuracy which may have a significant impact on the settlement considering the ever increasing influence and importance of Neighbourhood Plans.

Following the adoption of the Joint Local Plan (with its revised housing figures for Ivybridge identified for the new plan period) the Company would recommend that the Neighbourhood Plan being prepared should identify site specific allocations – thereby implementing the Joint Local Plan's higher level housing number requirement for Ivybridge as a whole on a site by site basis. To assist in such a process the Company would anticipate a detailed sustainability review of each and every possible development site in Ivybridge being completed and scrutinised throughout consultation. A short listing of the preferred sites to accommodate growth should thereon be consulted upon and assessed in detail in advance of adopting the Neighbourhood Plan.

I would be grateful if you would register this representation and make the Company aware of any further opportunity to comment. Should you have any queries with the above, Persimmon Homes would welcome the opportunity to aid in any further development of the Neighbourhood Plan going forward.

Yours sincerely



Jamie Grant
Junior Strategic Planner



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Our Ref: JG

12 January, 2017

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13 JAN 2017

Dear Sir/Madam,

RE: IVYBRIDGE NEIGHBOURHOOD PLAN PROPOSAL

On behalf of Persimmon Homes South West, I would like to take this opportunity to submit comments relating to the proposed Neighbourhood Plan submission prepared by Ivybridge Town Council. The Company formally objects to the Neighbourhood Plan in its current form, primarily due to potential inaccuracy, an outdated evidence base and the submission being premature to an emerging Joint Local Plan.

In reviewing the contents and purpose of the Neighbourhood Plan, Persimmon Homes would like to draw attention to the availability and suitability of land to the west of Woodland Road, Ivybridge. As you are aware the Company has recently secured a detailed planning consent for 74 dwellings. The infrastructure serving this development is suitable to accommodate additional dwellings beyond. The location by virtue of the Phase 1 planning consent has been considered sustainable and has met the National Planning Policy Framework criteria for new housing development. It must therefore stand that a Phase 2 beyond would be considered similarly.

Persimmon Homes considers that there is additional capacity for circa 180 – 250 dwellings within a phase 2 area north of the existing planning consent. The site is located adjacent to the settlement boundary, and will restrict the wider encroachment in to the open countryside within other parts of Ivybridge. The site is located close to local amenities and services and will be accessed through Phase 1.

The purpose of a Neighbourhood Plan is to apply the detailed and localised policy following from a strategic higher order policy as set out within an overarching Local Plan (in this case the adopted plans within the Local Development Framework and the emerging Plymouth and West Devon Plan). Neighbourhood Plans cannot introduce new policy or be in anyway contrary to existing policy but can provide additional clarity, allocation and land use guidance.

A Neighbourhood Plan should only be adopted when the overarching Authority wide policies on which it acts and applies are up to date and sound. In the case of South Hams the Planning Authority cannot demonstrate an up to date five year housing land supply, this is a position which is readily acknowledged and accepted by the Council. It is considered that at this time the supply is between 2.5 – 3 years. In such an event the National Planning Policy Framework

(NPPF) is clear in determining the Local Plan “silent” in respect of housing – the principles of sustainable development therefore apply when considering planning applications.

It is on this basis Persimmon has significant concerns with the preparation of a Neighbourhood Plan under the existing policies of the adopted plan. In recent history there have been a number of appeal decisions that have reconfirmed that South Hams are unable to maintain an up to date land supply. Accordingly, the allocations and policy as set out within the Local Plan in respect of housing development are considered inadequate and as a consequence any Neighbourhood Plan which has been prepared and adopted under its policy provisions or remit must also be considered equally unsound and “silent”.

Persimmon is aware that the initial stages of the Local Plan Review (Plymouth and South West Devon 2011-2034) is underway. It is anticipated that this emerging Local Plan will address comprehensively the short fallings in the Authorities housing delivery and allocate additional sites to make up this deficit. Ivybridge is a primary settlement in that it has the primary core services to accommodate substantial future growth. As such Persimmon Homes would endorse the future allocation of additional housing in sustainable locations within the settlement. Until such time as the Local Plan review has consulted, examined and been adopted, the preparation of a Neighbourhood Plan for Ivybridge should be suspended. To be clear, the Company supports fully the principle of a Neighbourhood Plan but only under an adopted and up to date Local Plan which has been found sound at Examination.

The Company does however support many of the overarching principles and objectives outlined within the Neighbourhood Plan which adhere to national and local policy; however the purpose of a Neighbourhood Plan has only been partly met. The Plan clearly advocates growth with a specific focus on the Town Centre, and acknowledges the possibility of future development not being limited to within the settlement boundary - there is recognition that planned and future growth should not be restrained, which the Company supports. However, there is a distinct lack of focus within the proposed Neighbourhood Plan on housing development and delivery within the settlement boundary to meet the current and future need of Ivybridge.

Part of the role and function of a Neighbourhood Plan is to shape the local area by identifying potential areas of growth. Currently the proposed Neighbourhood Plan does not entirely meet the objectives within the Thriving Towns and Village document which suggests ‘that in the first instance the Joint Local Plan will not make allocations. The intention is to allow the scope and opportunity for Neighbourhood Plans to take up this role under the powers and funding being made available’. The proposed Neighbourhood Plan details growth within and north of the town centre, however does little to tackle the greater future housing needs of Ivybridge.

Since the adoption of the Ivybridge Site Allocations DPD (February 2011), housing delivery numbers have fallen behind predicted targets, and many of the sites allocated within the DPD have not progressed. This has contributed to South Hams being unable to demonstrate and maintain a 5 year housing land supply as stated previously, and the settlement being unable to accommodate growth. The current situation differs from that of 5 years ago and should be reflected within the Neighbourhood Plan. The anticipated housing number requirement to be

issued within the forthcoming Joint Local Plan is anticipated to be higher than previously adopted policy; therefore additional sites need to come forward within the plan period.

The crux of this representation is that the Neighbourhood Plan is premature and should be postponed and re-evaluated based on emerging policy and its evidence base. The Plymouth and South West Devon Joint Local Plan is currently being prepared, with an anticipated published version to be available in February 2017 and adoption in autumn 2017. Consultation has recently concluded on the Thriving Towns and Villages document as well as a call for sites, both of which form part of the evidence base of the Joint Local Plan. Within the Thriving Towns and Villages document the relationship between Neighbourhood Plans within the region and the Joint Local Plan is described as follows 'Neighbourhood Plans shape their local areas and can include policies and land allocations to support locally appropriate growth. They cannot plan for less growth than required in the Joint Local Plan – but can help significantly in shaping where that growth should be'. In its current form the Neighbourhood Plan risks potential inaccuracy which may have a significant impact on the settlement considering the ever increasing influence and importance of Neighbourhood Plans.

Following the adoption of the Joint Local Plan (with its revised housing figures for Ivybridge identified for the new plan period) the Company would recommend that the Neighbourhood Plan being prepared should identify site specific allocations – thereby implementing the Joint Local Plan's higher level housing number requirement for Ivybridge as a whole on a site by site basis. To assist in such a process the Company would anticipate a detailed sustainability review of each and every potential development site in Ivybridge being completed and scrutinised throughout consultation. A short listing of the preferred sites to accommodate growth should thereon be consulted upon and assessed in detail in advance of adopting the Neighbourhood Plan.

I would be grateful if you would register this representation and make the Company aware of any further opportunity to comment. Should you have any queries with the above, Persimmon Homes would welcome the opportunity to aid in any further development of the Neighbourhood Plan going forward.

Yours sincerely



Jamie Grant
Junior Strategic Planner

APPENDIX 2 Highways England



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9 January 2017

Dear Ms Packham

Ivybridge Neighbourhood Plan – submission consultation

Thank you for providing Highways England with the opportunity to comment on the submission version of the Ivybridge Neighbourhood Plan. We are responsible for operating, maintaining and improving the strategic road network (SRN), which in this case consists of the A38. It is on the basis of these responsibilities that our following comments are made.

Of particular interest to us is proposed plan policy INP7. This seeks to commission a transport study to determine solutions to the traffic issues identified in the plan. It states that the study should propose an integrated travel plan which should 'include the means to address improved access to and junction arrangements with the A38', amongst other measures. The study, and the delivery of identified measures, is proposed to be funded by contributions from new development.

The policy which defines our involvement in the local plan making process is contained within DfT Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development', and these principles are also reflected in the NPPF. Paragraph 15 of DfT Circular 02/2013 states that: 'In order to develop a robust transport evidence base [for local plans], the Agency [now Highways England] will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'

Paragraph 18 states that 'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency [now Highways England] will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'

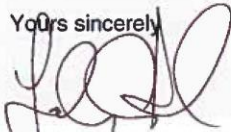
We recognise that the Ivybridge community has had an aspiration for a new A38 junction for some time. To date, our view has been that the current levels of proposed growth would not support extensive junction improvement works, and our previous discussions with stakeholders as part of the wider growth agenda did not identify Ivybridge as a priority site for SRN improvements.

However, we are currently working with South Hams District Council, Plymouth City Council, West Devon Borough Council and Devon County Council to develop the transport evidence based to support the developing Plymouth and South West Devon Joint Local Plan. This will include consideration of the infrastructure necessary to support further planned growth in Ivybridge. The Ivybridge Neighbourhood Plan's proposed study would therefore need to consider how it feeds into this evidence base, and Highways England would welcome early engagement with, and an invitation to input into, the development of the study.

In more general terms, we are fully supportive of the general thrust of the Plan's policies which seek to improve the sustainability of Ivybridge by encouraging mixed use development, improved local facilities and connectivity to create a vibrant and self-contained community. This will in turn reduce the reliance on the private car, and the need for out-commuting for employment and services.

If it would be helpful to discuss any of the above, please don't hesitate to contact me.

Yours sincerely



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