



Ugborough Neighbourhood Development Plan

2017-2032

Consultation Statement

Giving our community more
power in planning local
development...



1. Introduction

The Neighbourhood Planning (General) Regulations 2012 (Localism Act 2011) require a Consultation Statement to set out the consultations undertaken for a Neighbourhood Development Plan (NDP).

Guidance from Department for Communities and Local Government (10 Sept 2013) states that: ***'the consultation statement submitted with the draft Neighbourhood Plan should reveal the quality and effectiveness of the consultation that has informed the Plan proposals.'***

In accordance with these Regulations and the local planning authority's guidance on consultation, the preparation of the Ugborough Neighbourhood Development Plan (UNDP) has involved local residents, businesses and other organisations with an interest in the Plan Area in all stages of its.

This Consultation Statement sets out details of events and consultations. It lists the activities in which the local community has been involved and the on-going work of volunteers.

This Consultation Statement supports the NDP in accordance with the Community Engagement Statement and Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

The Consultation Statement contains the following:

- Details of people and organisations consulted about the proposed UNDP.
- Details of how they were consulted.
- A summary of the main issues and concerns raised through the consultation process.
- Descriptions of how these issues and concerns have been considered and addressed in the proposed Ugborough Neighbourhood Development Plan.

The aim of public engagement is to gather local people's ideas and wishes for the future of the Plan Area. Engagement ensures that the NDP will be an evidence-based document with a clear audit trail of activities and outcomes.

The consultations in the Ugborough Plan Area have been to ensure that there is as widespread as possible awareness and understanding of the rationale and content of the NDP and to encourage community engagement to influence and shape the final Plan.

This Consultation Statement demonstrates that there has been extensive community engagement, which has informed the community of the progress and evolved the content of the Ugborough NDP.

The consultations in the Ugborough Plan Area have been as widespread as possible. A website (www.ugboroughplan.org) and Facebook and Twitter accounts (@UgboroughPlan) were established. Public engagement events and road-shows have been carried out and workshops have taken place.

Monthly updates on progress were included in the Parish Newsletter. The website was regularly updated with information on meetings, forthcoming Ugborough NDP events and other information.

A comprehensive Interim Report was published and circulated to all households in the Plan Area in March 2015 and also uploaded onto the website (see Annex 14).

These engagement routes were all to ensure that awareness and understanding of the rationale and content of the Ugborough NDP reached as many people in the Plan Area as possible in order to inform and to encourage community engagement to influence and shape the final Plan.

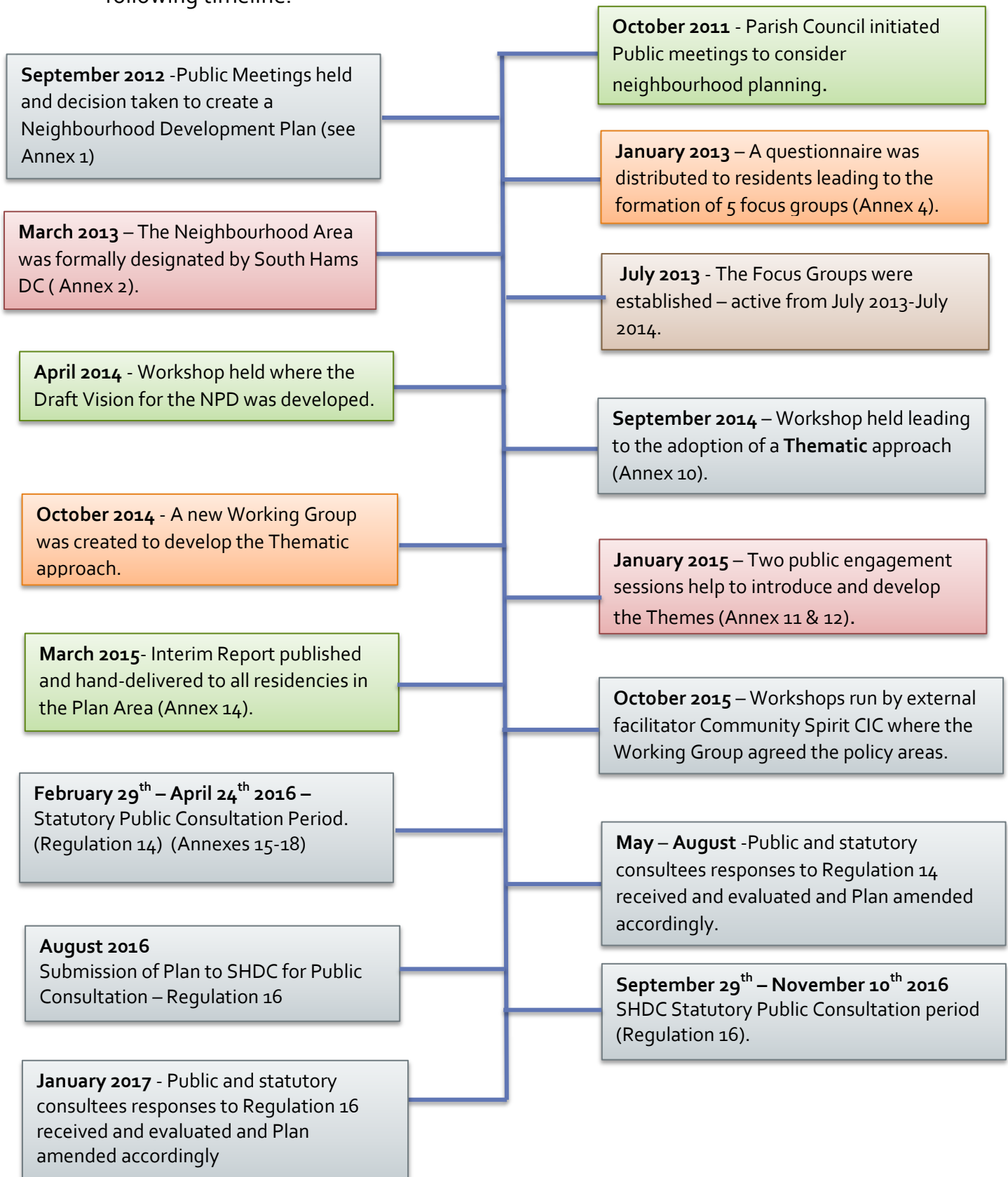
2. The Plan preparation process

The Localism Act 2011 defines the Parish Council as the 'Qualifying Body', empowered to approve and submit the Neighbourhood Plan. As the Plan should involve the community Ugborough Parish Council setup the Ugborough Neighbourhood Plan Working Group (Working Group) consisting of a number of local volunteers. The Plan preparation process has been led by this Working Group which has been key in compiling the evidence base, engaging with the local community and testing the suitability and acceptability of the emerging policies and proposals of the NDP.

The process of preparing and seeking final adoption of the Neighbourhood Plan is in accordance with the Neighbourhood Plan (General) Regulations 2012 and has been agreed by Ugborough Parish Council.

2.1 Timeline

The process up to Submission has comprised a number of stages as shown in the following timeline:



2.2 Ugborough Neighbourhood Development Plan Working Group

Ugborough Parish Council decided to consider the development of a NDP in late 2011. The NDP Working Group was established in December 2012 to develop the Plan.

In October 2014 the Working Group was reformed with the change in the terms of reference revised to reflect the Thematic Approach which was agreed by the Parish Council at the time.

Reference **Parish Council minutes 8th October 2014**

<https://ugboroughpc.files.wordpress.com/2015/02/8-10-14-minutes.pdf> and

Working Group Minutes of 14th October 2014.

http://media.wix.com/ugd/7485cc_79b1531ef98045e89e3e7450eb139055.pdf

The Working Group reports to Parish Council, the qualifying body where final decision making rests. The terms of reference and membership of the Working Group can be found at <http://www.ugboroughplan.org/#!terms-of-reference/c677>. Members of the community were invited, via the Parish Newsletter and at engagement events, to join the Working Group both in 2012 and again when it was reformed in October 2014. Every effort has been made to ensure the Working Group membership has been representative of the demographic and interests of the wider community. Since October 2014 the Working Group membership has included the following:

- Those with young families
- Older residents
- Those with limited mobility
- Those living in settlements and those living in isolated rural areas
- Owner occupiers and those living in rented housing
- Those owning local and rural businesses
- Those commuting to work and those working from home.

A monthly report of the NDP progress is included as an agenda item at all Parish Council meetings and minutes of Working Group meetings are publically available on the NDP website (www.ugboroughplan.org) and linked to the parish website (www.ugborough.com)

2.3 Designation of Neighbourhood Plan area

The Parish Council began the process of developing a NDP in 2012 and an application for designation of the Plan Area was made in ([Annex 1](#)). Approval for the Neighbourhood Plan Area was received in March 2013. ([Annex 2](#)).

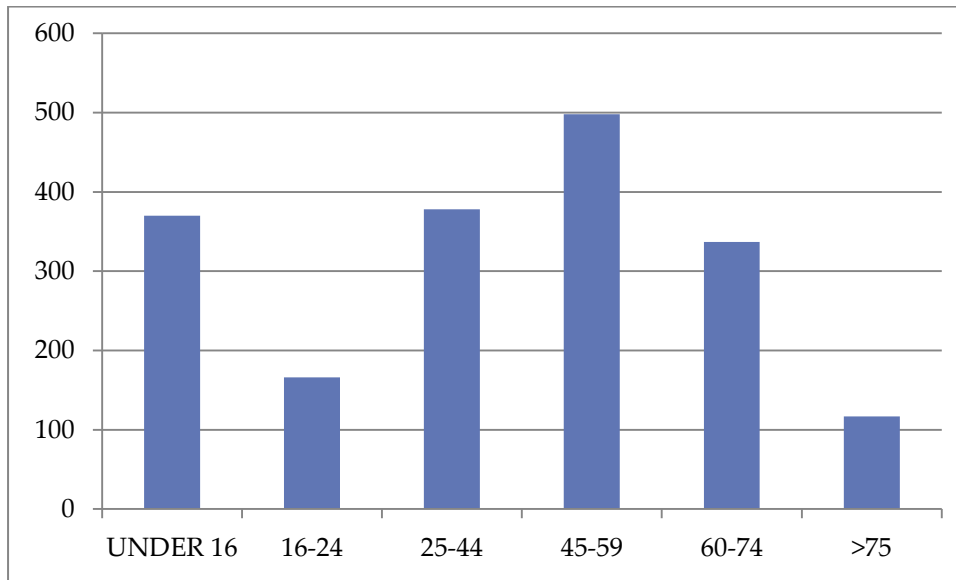
2.3.1. In order to describe the Plan area census data was interrogated.

Unfortunately census data is only available at Parish level but the demographic data below provides an indication of the demographics of the Plan Area.

Key statistics	Measure	Ugborough Parish
2011 Population: All Usual Residents	Count	1,884
2011 Population: Males	Count	929
2011 Population: Females	Count	955
2011 Density (number of persons per hectare)	Rate	0.5
All Households	Count	754
All households who owned their accommodation outright	%	39.1
All households who owned their accommodation with a mortgage or loan	%	36.2
Very Good Health	%	54.1
Good Health	%	30.3
Day-to-Day Activities Limited a Lot	%	6.2
Economically Active: Employee; Full-Time	%	35.0
Economically Active: Employee; Part-Time	%	13.5
Economically Active: Self-Employed	%	20.0
Economically Active: Unemployed	%	2.0 ³
People aged 16 and over with 5 or more GCSEs grade A-C, or equivalent	%	14.7
People aged 16 and over with no formal qualifications	%	15.8 ³

National Census 2011 (<http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-and-quick-statistics-for-parishes-and-parliamentary-constituencies-in-england-and-wales/index.html>)

Age Data (Census 2011)



2.4 Working with South Hams District Council

Extensive support and advice has been provided by SHDC including: training and briefing sessions on neighbourhood planning, individual meetings, direct communication with officers. SHDC also worked with the Working Group on the Housing Needs Survey initiated by the Parish Council in Spring 2015.

3. Community Engagement and Consultation

3.1. Background

In September 2012 the Parish Council held public consultations resulting in a Questionnaire being sent out to residents in January 2013. The results of this questionnaire were published in March 2013 and indicated five areas needing further exploration and these became the basis for the Focus Groups:

- Housing
- Car Parking
- Preschool
- Open Space
- Local Shop.

The setting up of the Focus Groups was advertised in the Parish newsletter and at the September 2013 roadshows and both residents and those conducting business in the Plan Area were invited to be part of one or more of the groups. Membership of the groups ranged from 5 to 15. The focus groups consulted widely within their particular topic areas and the car parking group conducted a survey within Ugborough village. Each focus group provided a final report detailing their findings in Spring 2014.

3.2 Engagement Strategy

An Engagement Strategy was put in place to consolidate the continued process of community engagement – this has been updated over time. ([Appendix 1](#))

3.3 Means of Communication

The Working Group has used a wide variety of means of engaging with the community of the Plan Area. This has included **open public meetings** and a variety of **questionnaires** including:

- a questionnaire to the whole Parish that resulted in the establishment of the focus groups in January 2013 (161 responses) (**Annex 4**).
- Press release in Parish Newsletter advertising roadshows (**Annex 5**)
- questionnaire at Ugborough Fair Days (30 responses in July 2014); (**Annex 6**)
- a car parking survey of Ugborough village residents in January 2014 (100 responses); (**Annex 7**)
- a youth group questionnaire; (**Annex 8**)
- questionnaire at roadshows in September 2013; and
- workshops in January 2015 (85 attendees from the Plan Area) (**Annexes 11-13**).

There were also specific approaches made to different community groups at events such as Sustainable Saturday seeking their views.

The Working Group held **roadshows** throughout the village in order to contact as many people as possible and ensure everyone was able to access information. A large **email group** was established of interested people who were kept up to date on developments.

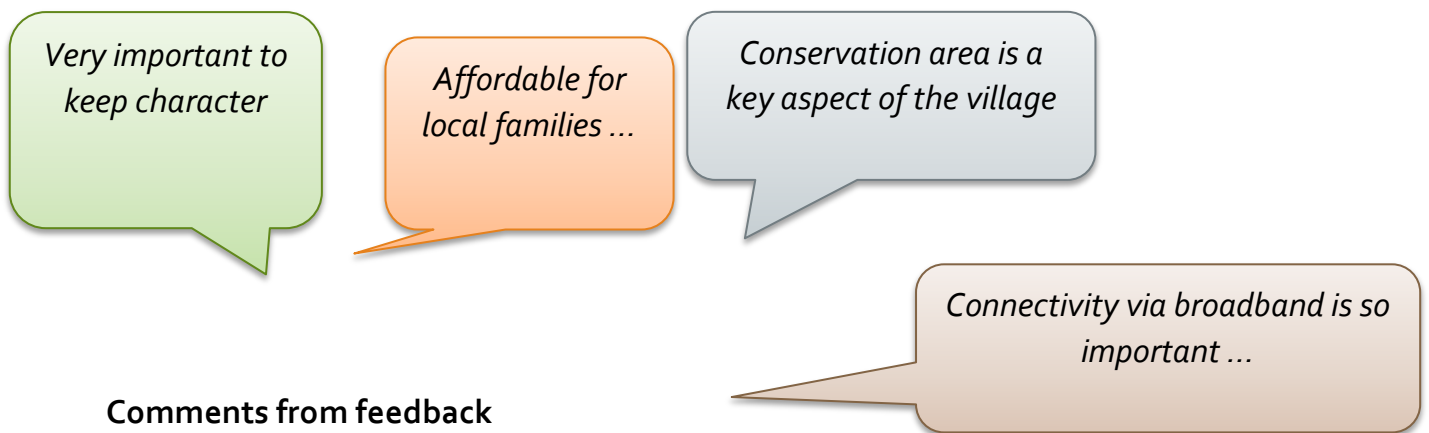
The **Focus Groups** were set up as a response to areas highlighted in the January 2013 questionnaire as requiring further investigation and these groups then developed their own questionnaires, held regular meetings and collated information.

The Working Group reports regularly to the **Parish Council** who, in turn, includes a regular monthly report in the **Parish Newsletter**. The NDP was also the main topic at the 2015 **Annual Parish Meeting**.

The **annual Ugborough village fairs** in July 2013 and July 2014 were an opportunity to tell the community how the Plan was developing and gather their views. There have also been regular **displays in the Ugborough village bus shelter**.

Originally information on the Ugborough NDP was publicised through the Parish Council website. However, in late 2014, an independent **website** (www.ugboroughplan.org) was established for the NDP and **Twitter** and **Facebook** accounts were set up to help spread information and gather views. These linked into the new village website that was established in early 2015. The Ugborough NDP website kept people up to date with the progress of the NDP as well as including minutes of meetings and links to wider information about the NDP development process as a whole.

In January 2015 two **engagement workshops** were held to further explore the emerging themes with members of the community and to gain feedback on relative importance and priority areas. These workshops were advertised and promoted through flyers, posters, on our website and with two pull-up displays outside the village hall (see appendices (see **Annexes 11&12**). Feed-back from the two workshops was in the form of post-it note, hand written comments on the “table cloths” and “post cards from the future” (see page 14). The outcome of these workshops, and comments made, led to the production of an **Interim Report (Annex 14)** distributed by hand to all households in the Plan Area in March and April 2015.



Comments from feedback

Since the Interim Report the Working Group has been preparing both background supporting material and the policies for the UNDP which were presented to the Parish Council in January 2016.

3.4 Consultation Events

A wide variety of consultation events have taken place since 2011

October/November 2011 Parish Council established initial Working Group and meetings held to discuss the opportunity for Ugborough to develop a NDP. Application made for designation of Plan Area. (**Annex 1 and Annex 3**).

September 2012 Consultation events in Ugborough village hall for all Parish residents, resulting in a parish- wide questionnaire. (**Annex 4**).

January 2013 Parish residents invited to Ugborough Village Hall meeting to find out more about Neighbourhood Planning, how they could be involved and briefed about the questionnaire being sent out to all households in the Parish. Original questionnaire sent to all households January 2013 (**Annex 4**)

July 2013 Ugborough Fair Day display and informal consultation to gain involvement and views of more residents. The event was aimed principally at finding out how the community wished to be communicated with and resulted in the September roadshows. (**Annex 6**)

March 2013 Formal designation of Plan Area. (**Annex 2**)

July 2013 Display at Ugborough Sustainable Saturdays encouraging involvement in the five Focus Groups. This has been regular location to spread updates about the NDP process and get feedback.

September 2013 Roadshows – Stalls were set up around Ugborough village raising awareness of the NDP process and building an email contact list of 50 to 60 residents keen to be kept informed of progress.

September 2013 Press release in Parish newsletter (**Annex 5**)

September 2013 to Spring 2014 Regular Focus Group meetings held. All residents of the Plan Area were invited but the Focus Groups mostly involved those on the email contact list.

January 2014 Car Parking Survey attracting 100 responses from Ugborough Village (**Annex 7**)

Spring 2014 Meeting with Head of School to discuss school related matters.

Spring 2014 Youth Group Questionnaire. Results suggest that transport links and places to meet up are important to this age group (**Annex 8**)

April 2014 Facilitated Workshop with Community Spirit to create a draft Vision for the UNDP with attendees from the email contact group.

July 2014 Ugborough Fair Display included a further display and questionnaire with 30 responses (**Annex 9**)



September 2014 Workshop in the Village Hall on September 27th led by Community Spirit (CIC) to consolidate the work undertaken to date. Fourteen members of the extended Working Group were involved in reviewing the two options (**Minutes Annex 10**):

- **Site -based.** The Plan would allocate sites itself that would include criteria for assessment of suitability
- **Theme-based.** The Plan would set themes/criteria for assessing proposed development, such as impact on landscape and skyline, setting of church and village, sustainability etc.

Before voting on either option the workshop set criteria for declarations of interest. There were 14 present who voted on the different options. There were no votes for site-based and 12 for theme-based . Two people abstained from voting.

November 2014 –
Engagement Strategy agreed by Working Group and Parish Council.

Autumn 2014 New members join the Working Group. New Website established to share information throughout the community and explain the NDP process. A new website was developed and Facebook and Twitter accounts created to help keep members of the community informed.

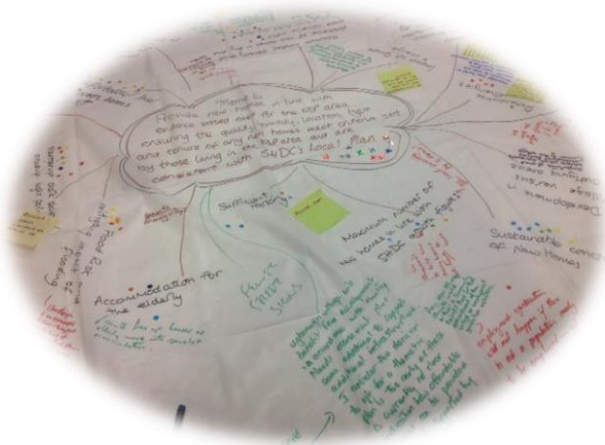
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Winter 2014/15 Regular displays about the progress of the Working Group with two large banners created to display at local events. (**Images of the banners, Annex 11**)

January 2015 Two workshops held (one afternoon, one evening) with the themes developed by the Working Group endorsed by attendees. Residents of the Plan Area also highlighted their priority areas. The workshops provided the first opportunity for the Working Group to present the theme-based approach to the Community. (**Annexes 12/13 Promotional Flyer and Organisation of these events**)



Thank you to all those involved in creating & organising a great event that feels inclusive & a great 'community' feel.



March 2015- Publication of Interim Progress Report – hand delivered to all the residencies in the Plan Area. Hard copies left in Church, pubs and in village hall. A postcard to collect responses was included with each and various collection points for these were set up and advertised. The report was also published on the website. (**Annex 14 Interim Report and Postcard for responses**)

January 2016 Draft Plan presented to Ugborough Parish Council and Approved.

February – April 2016 Public Consultation of pre-submission NDP (regulation 14).

September 29th – November 10th 2016 SHDC Statutory Public Consultation period (Regulation 16).

3.5 The Whole Community

Membership of the Working Group has varied over the life-time of the development of the NDP but it has always been reflective of the community, including all ages and those from many walks of life. There has been a consistent and active core and fortnightly meetings to help the process advance.

See section 2.3 above)



The Working Group has endeavoured to be inclusive in its approach and reach out across the whole community, e.g. hand delivering material to all residential properties, including holiday homes and those living in caravans. Material has regularly been available at Ugborough Sustainable Saturdays, where the older and less mobile members of the community meet up to chat over coffee. The roadshows included stalls with information and people on hand across Ugborough village to give residents a chance to ask questions and find answers just a few metres from their home.

3.6 Housing Needs Survey

In spring 2015 SHDC carried out a parish wide Housing Needs Survey. The survey was posted to every household in the parish and the results were considered in consultation with SHDC specifically for the Plan Area

3.7 Public Consultation (Regulation 14)

Public Consultation (Regulation 14 of the Neighbourhood Planning (General) Regulations 2012) was held between February 29th and April 24th 2016.

A flyer promoting the public consultation (Annex 15) was hand-delivered to all the homes and businesses in the Ugborough NDP along with the Parish Newsletter wherever possible and via a separate specific exercise by NDP Working Group volunteers where this was not possible.

Approximately 30 posters were displayed around the NDP area in outside locations and on various notice boards. Those in outdoor locations were laminated for durability (Annex 16).

Hard copies of the Plan and associated documents were left in the church and the village hall for reference use only.

An item advertising the public consultation was also included in the Parish Newsletter. The Parish Newsletter is hand delivered in printed form to the majority of households in the NDP area as well as being available in pubs and the Village Halls. It is offered in electronic form to those outside the hand delivery area (Annex 17).

The public consultation was also advertised in the Public Notices section of the Ivybridge Gazette (Annex 18).

The public consultation was also promoted / publicised using the following electronic/social media:

- Ugborough NDP website www.ugboroughplan.org .
- The website also offered a hard copy of the Plan to anyone who wished to have one.
- Twitter Feed @UgboroughPlan
- Tweet 29th February 2016 announcing launch of Public Consultation on pre-submission NDP
- Tweet 5th March 2016 encouraging engagement with the pre-submission NDP at Ugborough Sustainable Saturday (USS)
- Facebook Ugborough Plan
 - Posting 21st February 2016 trailing forthcoming Consultation on pre-submission NDP
 - Posting 28th February 2016 announcing launch of Consultation on pre-submission NDP
 - Posting encouraging engagement with the pre-submission NDP at Ugborough Sustainable Saturday (USS)
- Message to the Ugborough Bugle network from Ugborough Parish Council Chair, and Ugborough NDP Working Group member, Cllr George Beable on 17th April 2016 encouraging participation in Regulation 14 consultation on pre-submission NDP.

Statutory Consultees

25 statutory consultee organisations were contacted via email (see table 1 below). In some cases more than one individual in an organisation was contacted. Reminders were sent to those who had not responded 2 weeks before the end of the consultation period.

The Working Group took sufficient and reasonable steps to make it known that the Regulation 14 consultation opportunity was open to other organisations. For example, businesses in the NDP Area received the same publicity flyer as householders. Both the RNIB transcription service, the Donkey Sanctuary at Filham Park and Riding for the Disabled Association (RDA) received the flyer and laminated publicity posters were placed at the entrance to both the major sports fields in the NDP Area. All these measures were taken by the start of the consultation period.

A total of 16 responses were received from statutory consultees (see table 1 below) and 29 responses from individual members of the public. (see Annex 19)

Table 1 : Ugborough NDP - Statutory Consultee responses

Organisation	Response
Historic England	<p>Thank you for your consultation on the Ugborough pre-submission Neighbourhood Plan.</p> <p>Our apologies for not responding before now but there is in fact little of a detailed nature that we would wish to comment on.</p> <p>We are most impressed by the emphasis which the Plan places on the preservation and enhancement of the area's historic environment and the amount of work which has been undertaken in preparing the evidence base with which to inform its policies and proposals. In particular the preparation of the Conservation Area Appraisal and Management Plan is a significant achievement, and using the information these exercises have provided to tailor policy criteria for acceptable development is a tangible illustration of their value and application.</p> <p>Your community is therefore to be much congratulated on the scope and quality of its Plan and supporting information.</p>
	<p>Parish Council/Working Group consideration of response</p> <p>Noted</p>
	<p>Amendments to NDP</p> <p>No change</p>
Network Rail	<p>Network Rail has been consulted by Ugborough Parish Council on the Neighbourhood Development Plan – Regulation 14. Thank you for providing us with this opportunity to comment on this Planning Policy document.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.</p>

Organisation	Response
	<p>Network Rail would draw the council's attention to the following (which applies to England only):</p> <p>The Town and Country Planning (Development Management Procedure) (England) Order 2015</p> <p>Publicity for applications for planning permission within 10 metres of relevant railway land</p> <p>16. (1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land.</p> <p>(2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land.</p> <p>(3) Where an infrastructure manager has instructed the local planning authority in writing that they do not require notification in relation to a particular description of development, type of building operation or in relation to specified sites or geographical areas ("the instruction"), the local planning authority is not required to notify that infrastructure manager.</p> <p>(4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing.</p> <p>(5) In paragraph (2) "requisite notice" means a notice in the appropriate form as set out in Schedule 3 or in a form substantially to the same effect.</p> <p><u>Developer Contributions</u></p> <p>The Neighbourhood Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development. The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network. To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:</p> <ul style="list-style-type: none"> ▪ A requirement for development contributions to deliver improvements to the rail network where appropriate. ▪ A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary

Organisation	Response
	<p>developer contributions towards rail to be calculated.</p> <ul style="list-style-type: none"> ▪ A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit. <p><u>Level Crossings</u> Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of development added over time • By the type of crossing involved • By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing • By developments that might impede pedestrians' ability to hear approaching trains • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. <p>South Hams District Council have a statutory responsibility under planning legislation (<i>Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010</i>) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway. Therefore, as Ugborough Parish Council will be the authority in this case they will still need to consult with Network Rail under schedule 5 on their proposals to determine if they impact upon the above mentioned level crossings.</p> <p><u>Planning Applications</u> We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above). We trust these comments will be considered in your preparation of the forthcoming Neighbourhood Development Plan.</p>
	<p>Parish Council/Working Group consideration of response Noted Plan amended to include:</p> <ul style="list-style-type: none"> • reference to The Town and Country Planning (Development

Organisation	Response
	<p>Management Procedure) (England) Order 2015. Publicity for applications for planning permission within 10 metres of relevant railway land.</p> <ul style="list-style-type: none"> • rail network in transport and movement section. • developer contribution as appropriate.
	<p>Amendments to NDP As above</p>
North Huish Parish Council	I do not expect a response to be made by North Huish Parish Council to your proposals.
Western Power	Having read through your plan I am unable to make comment at this time. Western Power Distribution is responsible for the installation and maintenance of the electricity distribution network in your area and as such will be involved in new connections to businesses and housing developments from time to time. As is the case now, all necessary consultations and notifications impacting the area covered by this plan would be undertaken once details were available and connections requested from our customers.
South West Local Enterprise Partnership	Please note we have received this consultation but the Heart of the South West Local Enterprise Partnership has no comment to make.
Modbury Parish Council	Thank you for including Modbury PC in your consultation. We considered it at our last meeting and noted that you had a specific policy regarding skyline development which was supported. We had no other comment to make.
	<p>Parish Council/Working Group consideration of response Noted</p>
	<p>Amendments to NDP No change.</p>
South Brent Parish Council	Thank you for your reminder regarding Ugborough Neighbourhood Development Plan, your correspondence has been noted by South Brent Parish Council.
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the progression of the Ugborough Neighbourhood Development Plan and we welcome being consulted on this pre-submission draft.</p> <p>Our comments are set out below.</p> <p><u>Section on biodiversity – general</u></p> <p>In terms of conserving and enhancing biodiversity and geodiversity interests we would wish to see an approach that seeks to avoid impacts as a first principle. If impacts cannot be avoided then measures should be sought for adequate mitigation or as a last resort compensated for (National Planning Policy Framework (NPPF) para 118). It is suggested that the above approach be reflected in the Plan text in this section.</p> <p><u>Section on Biodiversity, 2nd para, page 48 and policy UG17: Community Facilities</u></p> <p>The final penultimate paragraph states that the Plan seeks to maintain the</p>

Organisation	Response
	<p>integrity of these networks and repair fragmentation following a green infrastructure approach. The reference to green infrastructure is welcomed however you may wish to consider the approach in more detail by:</p> <ul style="list-style-type: none"> • Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community • Setting out policy/proposals to address any deficiencies in green space or enhance existing provision. For instance you may wish to widen the scope of policy UG17 (Community Facilities). <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>
	<p>Parish Council/Working Group consideration of response Amend biodiversity section to include recommendations above. Reference South Hams Green Infrastructure Framework, April 2015, SHDC.</p>
	<p>Amendments to NDP As above</p>
<p>Environment Agency</p>	<p>We are supportive of the overarching vision which seeks to secure a 'sustainable future for all'. However, it is noted that the five themes, under which the plan is structured, do not explicitly include the natural environment. This means it is not obvious straightaway where the plan addresses environmental issues.</p> <p>The supporting text under the Heritage theme refers to maintaining green infrastructure and conserving the natural environment in respect of maintaining and enhancing the character and heritage of the plan area. It is also noted that it is an expressed community wish to maintain open water courses and protect banks/hedgerows. We support this. However, the natural environment is not then referenced specifically in any policy under this theme. Instead environmental policies are included under the Housing theme.</p> <p>The section on biodiversity under the Housing theme highlights the importance of natural habitats, river corridors and green infrastructure in the plan area and recognises that 'sound land and natural resource management' can positively contribute to biodiversity, flood risk management and reducing water pollution. We welcome this recognition.</p> <p>Policy UG11 regarding landscape and the built environment includes requirements that development 'must not have a detrimental impact on the biodiversity and ecology of the surrounding landscape' and 'must be in a sustainable location e.g. not in a floodplain'. Furthermore, Policy UG14 regarding sustainability states that 'new development will not be permitted on a site either within a Flood Zone or affected by a Flood Zone', that it must be demonstrated how drainage from developments will be connected and that development should promote health and wellbeing (including the benefits that arise from the natural environment and green spaces). We support these policy requirements, particularly those in respect of flood risk which are actually stronger than the requirements set out in the National Planning Policy Framework.</p>

Organisation	Response
	<p>Floodplains associated with the Rivers Erme and Avon, the Lud Brook and smaller tributaries such as the Lutterburn put parts of the neighbourhood plan area at risk of flooding. Whilst there are small areas of development (including part of Ugborough village itself) which are indicated to be at risk of flooding, the majority of existing development within the plan area appears to be located outside of these areas. Therefore the policy requirement prohibiting any new development in Flood Zones is feasible and reasonable because sufficient land to deliver necessary development should exist outside them.</p> <p>However, it is noted that there is no specific policy or consideration of the contribution the plan can make to protecting/enhancing the water environment within the neighbourhood area.</p> <p>With regard to the status of the water environment, both the Lud Brook and the River Erme are at Moderate Ecological Status. The Erme is failing with regard to fish in its upper reaches and both macrophytes/phytobenthos and phosphate in its lower reaches (the latter are indicative of high nutrient levels which can originate from agriculture or waste water treatment discharges). The Lud Brook is also failing with regard to macrophytes/phytobenthos. It is the target under the Water Framework Directive for these water-bodies to meet Good Ecological Status by 2027. Therefore, any new development must not cause deterioration from the present status and the plan should seek opportunities to meet the desired status.</p>
	<p>Parish Council/Working Group consideration of response Noted Policy UG1, Historic features, amended to include reference to the natural environment. Policy UG14, Sustainability, amended to include more on flooding and status of water environment as detailed above.</p>
	<p>Amendments to NDP As above</p>
<p>Devon County Council</p>	<p>Thank you for the opportunity to comment on your Neighbourhood Development Plan. Having studied the document on your website I am pleased to see that you have taken into account Devon County Council's HDMA 2008(http://www.devon.gov.uk/highways-standingadvice.pdf) and other core strategy advice that is pertinent to your locality. I note that your plan takes into account the constraints and opportunities of the current routes to the A38 and local cycle routes and pathways when considering your local neighbourhood plan development. Noting also that your local plan acknowledges the rural nature of your Parish and the challenges that accompany this. I find that your consultation process and use and knowledge of external agency's policies has ensured that the plan you have produced is robust and representative of your Parish.</p>
	<p>Parish Council/Working Group consideration of response Noted</p>
	<p>Amendments to NDP No change.</p>

Organisation	Response
Ivybridge Town Council	<p>Unfortunately because of the need for the town of Ivybridge to push into Ugborough in order to solve its transport/highways/infrastructure problems we have to lodge an objection as those aspects are not addressed – even though we had representatives from Ugborough as part of our Neighbourhood Plan group and they were aware of our difficulties.</p> <p>We also anticipate that the next phase of development for Ivybridge will not be accommodated within the expanded boundaries and will once again overspill into the Ugborough Parish so it is important that if those houses are going to emerge that Ugborough has a policy on them if they are to be considered in the context of rural development and won't look to Ivybridge for their services. I suspect though this is unlikely as the District will seek to expand Ivybridge, which it can only do by pushing further into Ugborough Parish on the southern side of the Exeter Road, which is part of the plan area.</p> <p>Maybe at this very late stage we need to consider the eastern and southern boundaries for our plan areas, but it might be that until July none of us will know the potential impact of development to 2031.</p> <p>Do you agree with our Vision Statement? - Yes</p> <p>Comments The vision for the plan sets an appropriate emphasis on the area's natural assets and reference to evolving needs and aspirations and a sustainable future for all is welcomed. This provides a basis for engagement with the large scale growth which is likely to be proposed at the edges of the plan area close to Ivybridge. However, many of the plan's objectives and policies do not adequately engage with that prospect. This is a recurring theme of the following comments, which ought not to be read as objections to the plan's content but as objection to the omission of necessary reference and policy regarding the large scale development which is likely to take place in the plan area before 2031.</p> <p>Theme HERITAGE:</p> <p>Do you agree with our Heritage Objectives? -Yes</p> <p>Comments</p> <p>Do you agree with our Heritage Policies? -Yes</p> <p>Comments</p> <p>Theme TRANSPORT & MOVEMENT:</p> <p>Do you agree with our Transport and Movement Objectives? - No</p> <p>Comments As well as recognising the character and capacity of existing roads there should be an objective to aim to enhance movement, safety and accessibility, particularly in response to growth.</p> <p>Do you agree with our Transport and Movement Policies? - No</p> <p>Comments The policy requires more than (final bullet) "an assessment of measures needed to mitigate any impacts". This should be strengthened and should require that any necessary measures be not only assessed but also delivered (and delivered in tandem with the development).</p>

Organisation	Response
	<p>Theme HOUSING:</p> <p>Do you agree with our Housing Objectives? - No Comments The objective refers to delivering “up to 30 new homes” in the plan period 2016-31. This is appropriate enough for the parish in itself but fails to engage with the prospect of a very much greater scale of development which is likely to emerge in Ugborough and adjacent to Ivybridge as part of the new South Hams local plan to 2031.</p> <p>Do you agree with our Housing Policies? - No Comments Again, there is no policy content regarding the large scale development likely to be required close to Ivybridge up to 2031. The extent of the plan area means that it is almost certainly going to be subject to some large scale development and its policies should cover the ground. In particular, there should be policies requiring the provision of necessary support infrastructure to service the development. Policies should mirror those contained in the Ivybridge Neighbourhood Plan.</p> <p>Theme ECONOMY:</p> <p>Do you agree with our Economy Objectives? - No Comments There is a need to engage with the large scale development likely close to Ivybridge and to seek a well-balanced mixed use approach to this.</p> <p>Do you agree with our Economy Policies? - No Comments There is a need for policy content related to large scale as well as rural business and employment.</p> <p>Theme WELL BEING:</p> <p>Do you agree with our Well Being Objectives? - No Comments They fail to engage with the large scale development likely to be proposed close to Ivybridge.</p> <p>Do you agree with our Well Being Policies? - No Comments Failure to engage with the likely prospect of large scale growth.</p> <p>Are you broadly in support of this Draft Neighbourhood Plan? - No Comments It is with great reluctance that Ivybridge Town Council must object to the Ugborough Neighbourhood Plan. Almost all of the Town Council's reservations about and objections to the plan would be removed if it were not for the need for it to engage with the large scale growth likely to be proposed close to Ivybridge. The plan has, perhaps understandably, focussed on the villages and countryside of the parish. Had the plan boundary been drawn to exclude the area likely to be subject to large scale growth then the plan could be much neater and untroubled by large scale growth issues.</p>

Organisation	Response
	<p>Parish Council/Working Group consideration of response Noted</p>
	<p>Amendments to NDP See amended Plan, in particular Housing Section.</p>
<p>Devon and Cornwall Constabulary</p>	<p>Thank you very much for inviting consultation with regard to the above. My role as the Police Architectural Liaison Officer (ALO) is to provide appropriate and relevant advice and recommendations to the Planning Authority, Developers and Architects with regard to designing out opportunities for crime, the fear of crime, antisocial behaviour (ASB) and conflict within the built environment, an effective method in improving the safety, security and well being of those who will live, work and visit those environments.</p> <p>The type of applications I would respond to, as agreed between the Police and the Planning Authority are:-</p> <ul style="list-style-type: none"> • Major housing schemes of 10+ dwellings • Major commercial office, industrial, retail or leisure schemes • New neighbourhood or district community facilities • Shop front improvements • Proposals which include significant areas of open space/landscaping as part of a development, including linkage footpaths • Proposals incorporating significant off street car parking provisions • Proposals involving transport interchanges or other significant highway infrastructure • Improvements such as cycle lanes and new or improved footpaths • All applications for Class A3, A4 and A5 food and drink uses • New or redeveloped schools/education premises • Where the intended occupants are particularly vulnerable and require higher standards of security to ensure their person safety (this would include Gypsy and Traveller sites, care homes and drug rehabilitation centres • ATM's • Solar Farms • Any planning policy documents where community safety is relevant. This will include the Core strategy and Supplementary Planning Guidance documents <p>As such it may be that some future developments for Ugborough will not receive a response from the Police, so reference to designing out crime and crime prevention per se should be embedded at the most appropriate and relevant place of the Neighbourhood Development Plan (NDP) in order to support and comply with the requirements of the following:-</p> <ul style="list-style-type: none"> • National Planning Policy Framework (NPPF) specifically paragraph 58 - Requiring good design and 69 - Promoting healthy communities. • Crime and Disorder Act 1998, specifically section 17 which directs that we must have community safety embedded into our planning, our policy and our operational day-to-day activity. It states <i>'Without prejudice to any other obligation imposed on it, it shall be the duty of each authority... to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and</i>

Organisation	Response
	<p><i>disorder in its area’.</i></p> <ul style="list-style-type: none"> • SHDC Local Development Framework – DP1 – 3.17 - High Quality Design • SHDC Local Development Framework, Core Strategy, Policy CS7 • Emerging Our Plan • And any other relevant local planning policies <p>All relevant planning applications should demonstrate, generally in the Design and Access Statement, the following principles of Crime Prevention through Environmental Design (CPtED) and how they have been considered and incorporated into the design and layout of all new developments. This provides reassurance and will ensure a consistent level of security throughout and opportunities for crime, the fear of crime, ASB and conflict are minimised:-</p> <ul style="list-style-type: none"> • Access and movement - Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security. • Structure - Places that are structured so that different uses do not cause conflict. • Surveillance - Places where all publicly accessible spaces are overlooked. • Ownership - Places that promote a sense of ownership, respect, territorial responsibility and community. • Physical protection - Places that include necessary, well-designed security features. • Activity - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times. • Management and maintenance - Places that are designed with management and maintenance in mind, to discourage crime. <p>I look forward to providing advice and recommendations with regard to planning applications that sit within my remit of response but in the meantime please do not hesitate to contact me if there is anything else I can help with.</p>
	<p>Parish Council/Working Group consideration of response Noted Policy UG12, Design, amended to include designing out crime and crime prevention as per advice above.</p>
	<p>Amendments to NDP As above</p>
South West Water	<p>Thank you for notifying South West Water of the above upon which we have no comment at present but are happy to provide further comment as and when development proposals are formalised.</p>
Marine Management Organisation	<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England’s marine area on behalf of the UK government. The MMO’s delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p>

Organisation	Response
	<p><u>Marine Licensing</u> Activities taking place below the mean high water mark may require a <u>marine licence</u> in accordance with the <u>Marine and Coastal Access Act (MCAA) 2009</u>. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p><u>Marine Planning</u> As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the <u>East Inshore and Offshore marine plans</u> were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our <u>Marine Information System</u>. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the <u>Marine Policy Statement</u> for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the <u>Marine and Coastal Access Act</u> and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our <u>online guidance</u> and the <u>Planning Advisory Service soundness self-assessment checklist</u>.</p> <p><u>Minerals and waste plans and local aggregate assessments</u> If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry.

Organisation	Response
	<ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>
	<p>Parish Council/Working Group consideration of response Noted</p>
	<p>Amendments to NDP No change</p>
Highways England	<p>Thank you for providing Highways England with the opportunity to comment on the submission version of the Ugborough Neighbourhood Plan. We are generally satisfied that the proposed policies are unlikely to impact on the operation or safety of the strategic road network, specifically the A38 which runs along the northern boundary of the plan area. In general terms we welcome the focus on policies which enable limited growth to reflect local housing and employment needs and support and enhance community facilities which will contribute to a sustainable and viable rural community. We also welcome the intention of policy UG3, particularly in relation to the provision of a suitable assessment of traffic impact for new development. However, we are concerned at the wording that development will be supported "... in a location that allows safe, direct and unhindered access onto the A38, A3121 or B3213...". Given the expressway status of the A38 in this location it is unlikely that any new access would be approved by Highways England, particularly given the existing junctions which provide access to the A3121 and B3213. Therefore we would suggest the wording of this policy be amended to remove reference to the A38.</p> <p>Please note that these comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.</p>
	<p>Parish Council/Working Group consideration of response Wording in Plan amended to read 'unhindered access to A3121 and B3213, leading to the A38'.</p>
	<p>Amendments to NDP As above</p>
South Hams District Council	<p>See Annex 20 and table below</p>
Dartmoor National Park	<p>No response received</p>

Organisation	Response
NHS Devon	No response received
Wales and West Utilities	No response received
Homes and Communities Agency	No response received
Vodafone and O2 EMF enquiries	No response received
EE	No response received
Three	No response received
The Coal Authority	No response received
Ermington Parish Council	No response received

Summary of Ugborough NDP amendments made in response to SHDC response to Regulation 14 consultation (see Annex 20)

SHDC response to consultation (please see full SHDC response for further information)	UNDP amendments
Introduction	Amended throughout Plan
Vision	'aim' changed to 'vision'
Heritage – P26	Objective wording amended
Policy UG1: Historic features	Policy wording amended
Policy UG2: Skyline and other views and vistas	Policy wording amended
Transport and movement	Objective wording amended Further evidence/text provided to support this section
UG3: Traffic flow	Minor amendments made to policy wording
Housing – P34	Objective rewritten as bullet points. Objective changed to 'deliver new homes over the period of the Plan in line with the historic growth trend (currently an average of 3 new homes per year). Further text added re non-allocation of sites and landscape impact of development.
UG4: Small scale housing development	Policy wording amended
UG5: Infill sites	Policy wording amended
UG6: Conversion of farm buildings	No change
P43	Added: 'The Plan would look favourably on any landowner willing to create a Community Land Trust in order to provide affordable housing.'
P44	Summary of housing needs survey added – actual number in need of affordable housing is 3. Further evidence/text added to justify approach to affordable housing.
UG7: Affordable housing	Policy wording amended
UG8: Local connection	No change
UG9: Self-build	No change

UG10: Older persons housing	No change
Biodiversity – P48	Text moved to Heritage theme.
UG11: Landscape and built environment character	Policy wording amended to remove reference to housing numbers.
UG12: Design	Policy wording amended to include: <ul style="list-style-type: none"> • in the first bullet: 'and supports innovative, original and excellent sustainable design' • meeting the requirements of 'Secured by Design' to minimise the likelihood and fear of crime.
UG13: Conservation Area	No change apart from addition of rationale with regard to not disadvantaging existing residents.
UG14: Sustainability	Policy amended to add: 'protecting/enhancing the water environment within the neighbourhood area' Reword 'or affected by a flood zone' 'affected by ground and surface water flooding'
UG15: Rural business	'settlements' change to 'properties'
UG16: Visitors to the Plan Area	No change
UG17: Community facilities	Reference added to map of facilities

Main issues from Regulation 14 consultation

The Regulation 14 Ugborough NDP was a result of the previous extensive community engagement as described earlier in this consultation statement. All the responses from the Regulation 14 consultation were considered by the Working Group and the Plan amended accordingly.

The majority of the **statutory consultees**, who responded, provided additional information for their particular areas of expertise and interest and these were included in the amended Plan where applicable.

The majority of **individuals** who responded were supportive of the Plan. Key issues raised and addressed by the addition of further detail to the Plan were as follows:

- Housing Needs Survey findings
- Census data, specifically relating to occupancy rates
- Walking, cycling and horse riding in the NDP Area
- Support for innovative and sustainable design
- The need to monitor the impact of development

In addition some individuals questioned the policies relating to the provision of new housing and delivery affordable housing. The wording of the objective for the housing section of the Plan and policies UG4, minor housing developments and UG7, new affordable housing, were amended to reflect these concerns.

3.8 Public consultation (Regulation 16)

Public Consultation (Regulation 16 of the Neighbourhood Planning (General) Regulations 2012) was held during October and November 2016 by SHDC.

Statutory consultee responses (as provided by SHDC)

Statutory consultee responses	
Natural England	<p>Planning consultation: Ugborough Neighbourhood Plan. Location: Ugborough, Devon.</p> <p>Thank you for your consultation on the above neighbourhood plan, which was received by Natural England on 29 September 2016.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>TOWN AND COUNTRY PLANNING, ENGLAND – THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012</p> <p>We welcome the preparation of the Ugborough Neighbourhood Plan and recognise the hard work being done by the parish in developing it. We note that the Neighbourhood Plan does relate to land use criteria-based policies but does not allocate specific sites.</p> <p>Natural England welcomes the amendments made to the Plan that reflect our advice to the Pre-Submission draft regarding the wording of the biodiversity section (page 28). We suggest that the wording of the final paragraph be amended to read as follows:</p> <p><i>In terms of conserving and enhancing biodiversity and geodiversity interest, the Plan seeks to avoid impacts as a first principle. If impacts cannot be avoided then measures should be sought for adequate mitigation or as a last resort compensated for (National Planning Policy Framework (NPPF) para 118).</i></p> <p>We also suggest that this paragraph should be given greater prominence</p>

within this section, by moving it nearer to the beginning.

As previously stated, we welcome the Plan's approach that seeks to 'maintain the integrity of [habitat] networks and repair fragmentation following a Green Infrastructure approach' (page 28). We would welcome more detail on how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. Setting out policy/proposals to address any deficiencies in green space or enhance existing provision. For instance you may wish to widen the scope of policy UG17 (Community Facilities).

It should be noted that small parts of the Neighbourhood Plan area (north-eastern and south-eastern fringes) fall within the sustenance zone and a strategic flyway¹ associated with the greater horseshoe bat interest of the **South Hams Special Area of Conservation (SAC)**. This is evidenced in your map on page 54.

Section on Landscape and character – reasoned justification (page 51)

The South Devon Area of Outstanding Natural Beauty (AONB) is inaccurately referred to as the 'Avon Valley AONB' on page 53.

Policy UG11: Landscape and built environment character

- In addition to criteria on landscape character and built character, this policy contains criteria seeking to avoid detrimental impacts on biodiversity. For clarity, we would suggest that these objectives be dealt with in a separate policy on biodiversity and geodiversity.

- There is a criterion seeking to avoid development on flood plains. This could be deleted as it is dealt with in UG14: Sustainability.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Darren Horn. For any new consultations, or to provide further information on this consultation please send your correspondences to

	<p>consultations@naturalengland.org.uk.</p> <p>Yours sincerely,</p> <p>Darren Horn</p> <p>Lead Adviser – Devon and Cornwall Terrestrial Planning and Water Team</p> <p>darren.horn@naturalengland.org.uk</p>
	<p>Parish Council/Working Group consideration of response</p> <p>Amend Plan as per recommendations above.</p>
	<p>Amendments to NDP</p> <p>As above</p>
<p>Marine Management Organisation</p>	<p><u>Response to your consultation</u></p> <p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England’s marine area on behalf of the UK government. The MMO’s delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p><u>Marine Licensing</u></p> <p>Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p><u>Marine Planning</u></p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021. Planning documents for areas with a coastal influence may wish to make</p>

	<p>reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p> <p><u>Minerals and waste plans and local aggregate assessments</u></p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <p>The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry.</p> <p>The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.</p> <p>The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.</p> <p>The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.</p> <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p> <p>If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.</p>
	<p>Parish Council/Working Group consideration of response Noted</p>
	<p>Amendments to NDP No change</p>

Summary of Ugborough NDP amendments made in response to SHDC response to Regulation 16 consultation (see Annex 22)

SHDC response to consultation (please see full SHDC response for further information)	UNDP amendments
Heritage objective and intention	Wording amended to 'conserve and enhance'. Describe what is meant by shape of Ugborough village
Traffic flow	Further detail from NPPF added.
Housing section	Further detail added to demonstrate how affordable housing need will be met. Requirement for affordable housing of 35% for any site of 3 or more houses added. Summary of results of Housing Need Survey revised for clarity. Reference to desk top site assessment added. Further detail added to demonstrate how Plan supports development in sustainable locations.
UG4: Small scale housing developments of less than 10.	Minor development changed to small scale, defined as less than 10
UG11: Landscape and built environment character	Minor changes to policy wording for clarity.
UG12: Design	Minor changes to policy wording for clarity.
UG13: Conservation Area	Reference made to Historic England's response. Bullet points 3, 4 and 5 amended to be less prescriptive.
UG14: Sustainability	First bullet amended to align with NPPF paragraph on development in an area at risk of flooding.
Economy	Minor changes to wording made for clarity.
Community wellbeing	Further detail from NPPF and SHDC policies added. Community facilities listed.

Main issues from Regulation 16 consultation

All the responses from the Regulation 16 consultation were considered by the Working Group and the Plan amended accordingly.

Two **statutory consultees** responded and, where additional information was provided by Natural England, the Plan was amended accordingly.

Three **individuals** responded. Key issues raised and addressed by the addition of further detail to the Plan were as follows:

- Revisions to wording of housing section and housing policies to demonstrate that the Plan supports development in a sustainable location
- Minor changes to heritage and economy policies
- Update on provision of fast broadband to the Plan Area

Appendix 1: Engagement Strategy

Ugborough Neighbourhood Development Plan Engagement Strategy, updated December 2015

INTRODUCTION

Since April 2011 local communities have been able to produce a Neighbourhood Development Plan (NDP) for their local area, putting in place planning policies for the sustainable development and growth of their neighbourhood. A NDP is a community led framework for guiding future development and growth within the statutory planning and decision making hierarchy.

Ugborough Parish Council decided to consider the development of a NDP for Ugborough in 2012.

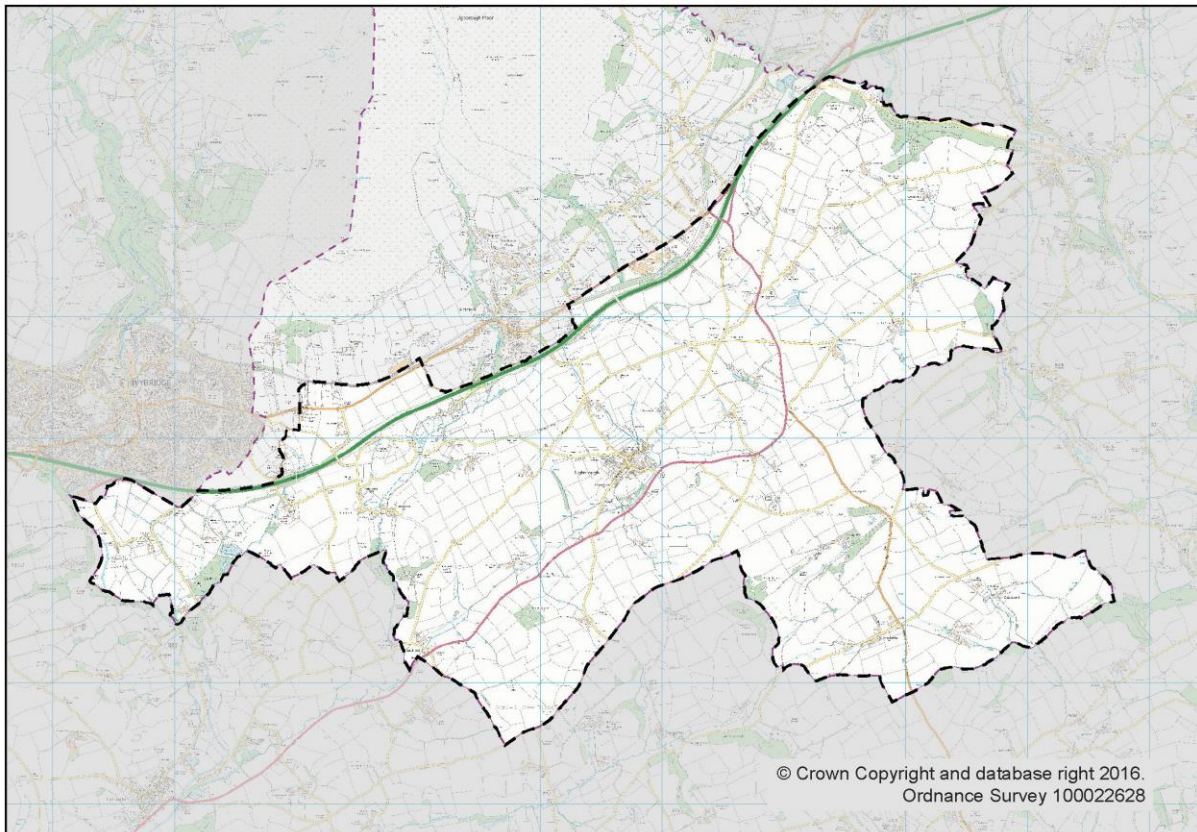
The development of the NDP is being taken forward by the Ugborough NDP Working Group. The Working Group reports to Parish Council, the qualifying body where final decision making rests.

This document sets out a strategy and plan for community engagement from November 2014 until November 2015, the planned date for completion of the Ugborough NDP.

Further information on neighbourhood planning, including the National Planning Policy Framework (NPPF) can be found at www.locality.org.uk.

Ugborough NDP area

The Ugborough NDP area was approved in February 2013. The area comprises the area within the black broken line on the map below and includes approximately 230 homes located within Ugborough Parish, outside Dartmoor National Park and south of the A38 Devon Expressway.



Draft vision

A draft vision for the Ugborough NDP has been agreed by the Parish Council:

Ugborough sits between the moor and sea with a distinct historic and natural environment and is a strong, balanced, rural community. Our aim is to maintain and enhance its character, support the local community while responding to evolving needs and aspirations of all.

WHY IS THE WORKING GROUP ENGAGING WITH THE COMMUNITY?

Effective community engagement and a robust evidence base are the pillars on which a good neighbourhood development plan will be built (www.locality.org.uk).

Community engagement is both necessary and important. It is required by law and is essential in developing consensus and creating community support. It will ensure the Working Group can find out what people think and draw on their skills and knowledge to develop an evidence base so that the NDP is realistic, appropriate and deliverable.

A NDP is a community plan and, therefore, must derive its objectives, actions and authority from the community. Members of the Working Group are determined that the community are kept informed of progress and given every opportunity to be

involved and tell the Working Group what they want. Communication and consultation in various forms will play a major role in developing the NDP and will:

- promote a high degree of awareness;
- encourage everyone to contribute to the development of the NDP;
- promote consultation events;
- provide regular updates on progress with the NDP.

The NDP Regulations require a completed NDP to include a Consultation Statement. The Consultation Statement is a document that includes the details of the persons and bodies consulted, how they were consulted, the main issues and concerns raised and how those issues and concerns have been considered and will be included in the final NDP.

WHEN WILL THE WORKING GROUP ENGAGE?

The Working Group will engage with the community at all stages in the process of producing Ugborough's NDP. The Working Group will engage with the community early on to raise awareness and gather information and initial views on broad issues. The Working Group will engage throughout the process so people can suggest improvements and feedback on earlier suggestions. The Working Group will consult on the final draft of the NDP.

WHO WILL THE WORKING GROUP ENGAGE WITH?

The Working Group intends to engage with all those who may be affected by the NDP. This includes:

- Residents of the NDP area.
- Those carrying out business in the NDP area.
- Those working in the NDP area.
- Those owning land in the NDP area.
- Those owning property in the NDP area.

HOW WILL THE WORKING GROUP ENGAGE?

The Working Group intends to engage with the community at a number of levels.

1. **Information** - The Working Group will provide regular updates and easily accessible, extensive information to the whole area using publicity, public events/open meetings, local press, parish newsletter, leaflets drops, banners/posters and electronic and social media (a communication plan is attached as an annex)
2. **Consultation** – The Working Group will actively seek feedback and views on information provided using surveys/questionnaires and consultation events.

3. **Involvement** – The Working Group will work directly with the community throughout the process so their concerns are consistently understood and considered. This will require a high level of participation by the community as the NDP is developed. The community will be encouraged to participate in the development of the NDP and assist in decision making via focus groups, workshops and social media. The Working Group will work in partnership with the community on every aspect of decision making including the development of options and a preferred position.

The Working Group will do its best to ensure the widest possible engagement by providing a broad range of engagement activities including those specifically aimed at those sections of the community that may be hard to reach, for example those who work away from home, the elderly and those in outlying rural areas.

The Working Group will keep a record of all engagement activity and this record will include:

- The engagement activity
- When it took place
- Aims of the activity
- Target audience
- Method of recording outcomes
- Outcomes and how they will be incorporated into the development of the NDP

ENGAGEMENT PLAN

Background to the early engagement activities

The initial draft NDP project brief envisaged two separate plans: one for the part of the parish for which SHDC is the planning authority; and the other for the area within the Dartmoor National Park. It also identified as development priorities housing and parking in the village of Ugborough and refers in detail to the 'Tall Oaks' proposal. It started with the assumptions laid out below.

As a starting point the Parish Council believes that the following could potentially be achieved by development in a Neighbourhood Plan.

- Enlarged community to support the Primary School, Church, Village Hall and other services, facilities and organisations;
- Relieve congestion in the Square and Lutterburn Street with carpark;
- Provide a village or community shop and cafe;
- Provide a community building which might accommodate;
 - office for work from home professionals and businesses;
 - School /Pre-school play group facilities;
 - community space for new societies and clubs/ hospitality.

Engagement Plan

This plan includes engagement activities that have taken place since September 2012.

Activity	When	Aim of the activity/desired outcomes	Target audience	Method of recording/capturing feedback	Brief outcome summary and how the outcomes will be incorporated into the development of the NDP
Two open meetings with presentations by landowners/developers including Tall Oaks.	Sep 2012	Gain initial views on priorities in specific areas: <ul style="list-style-type: none"> • New housing • Car parking • Community shop • Community green space • Community building for pre-school play group and other facilities 		70 attendees 249 post-it notes Post-it notes counted and comments recorded. Letters submitted to supplement post -it notes not recorded.	Same areas taken forward into questionnaire: <ul style="list-style-type: none"> • New housing • Car parking • Community shop • Community green space • Community building for pre-school play group and other facilities
Open meeting	Jan 2013	Inform community about NDP and questionnaire.	Parish		
Questionnaire delivered to every home in Parish	Jan 2013	Gather opinions of everyone in Parish.	Households in Parish	Completed questionnaires put in collection boxes or collected at the door. Questionnaire responses collated and analysed.	161 responses (23% response rate) The analysis of the questionnaire has never been fully resolved as both the questions and the responses were capable of a variety of interpretations, particularly around the number, build rate

Activity	When	Aim of the activity/desired outcomes	Target audience	Method of recording/capturing feedback	Brief outcome summary and how the outcomes will be incorporated into the development of the NDP
					<p>and type of houses that might be included in a development. The report is available on the website and it is best to form one's own judgement.</p> <p>5 Focus Groups established to explore further the themes identified as possible areas to take forward into the NDP:</p> <ul style="list-style-type: none"> • Housing • Car parking • Open space • Pre-school • Village shop
Display and questionnaire at Ugborough Fair	Jul 2013	Gain wider engagement and gather ideas for improving engagement.		Questionnaire responses collated.	This suggested that street by street meetings and a village gathering would be well received. Ideas for improving engagement taken forward into engagement plan.
Display at Ugborough Sustainable Saturday	Jul 2013	Gain wider engagement	Visitors to USS	Response slips	Wider group of people involved in focus groups.
Road shows in Village	Sep 2013	Gain wider engagement in the focus groups.	Ugborough Village	Response slips	Wider group of people involved in focus groups. Email circulation list of 50-60 people.

Activity	When	Aim of the activity/desired outcomes	Target audience	Method of recording/capturing feedback	Brief outcome summary and how the outcomes will be incorporated into the development of the NDP
Focus Groups: <ul style="list-style-type: none"> • Housing • Car parking • Open space • Pre school • Village shop 	Ongoing Sep 2013 to Spring 2014	Explore further the themes identified as a result of the collated responses to the Jan 13 questionnaire.	NDP area	Notes of meetings. Further research e.g. car parking survey	Development of evidence base.
Car parking survey	Jan 2014	Establish car ownership and parking capacity in Village.	Ugborough Village	Door to door interviews recorded. 100 responses to the survey.	Outcomes informed 3 draft car parking options but the overwhelming view was that, in village wide terms, car parking wasn't a big issue.
Youth Group Questionnaire	early 2014	Gain views of Youth Group members.	Youth Group	Questionnaire responses collated	Development of evidence base. Better transport to/from Ivybridge and an area for youngsters to congregate were the main points.
Discussion with Head Teacher of Ugborough School	early 2014	Gain further information on parking needs in the Village.	Head teacher of Ugborough School	Notes of discussion	Inform car parking options. The Head Teacher was positive about the idea of the playing field area being developed into a community space.
Discussions with publicans.	early 2014	Gain further information on parking needs in the Village.	Publicans	Notes of discussion	Inform car parking options.
Facilitated workshop	Apr 2014	Develop a draft vision for the NDP.	Working Group	Notes of workshop	Draft vision statement. Actions to develop a character

Activity	When	Aim of the activity/desired outcomes	Target audience	Method of recording/capturing feedback	Brief outcome summary and how the outcomes will be incorporated into the development of the NDP
		Agree next steps in developing the evidence base.			analysis of the area and consult on the draft vision statement. This was the start of the WG consideration of the theme rather than a fixed development based proposal.
Display and questionnaire at Ugborough Fair	Jul 2014	Gain views on future needs of the NDP area, future development of the NDP area and concerns for the NDP area.	Residents	30 responses to the questionnaire. Post-it notes on display boards.	This was the WG's first attempt to place the Plan in the context of both a historic and geographic environment. It provided further views to support the development of options and it broadened the engagement base.
Facilitated workshop	Sep 2014	Consolidation of work already undertaken. Determine work outstanding. Draft a community engagement programme.	Working Group plus focus group members	Notes of workshop	Outcomes provided a direction for moving forward with the development of a NDP including: <ul style="list-style-type: none"> • A thematic approach to the NDP. • Broader representation on the Working Group. As a result of this workshop the WG went back to the Parish Council (PC) with a proposal to reconstitute the WG and its

Activity	When	Aim of the activity/desired outcomes	Target audience	Method of recording/capturing feedback	Brief outcome summary and how the outcomes will be incorporated into the development of the NDP
					relationship with the PC and to pursue a Theme based approach. Both these points were endorsed by the PC.
Consultation on themes/objectives using social media, workshops, discussions with existing groups	Nov 2014 – Jan 2015	Agreement to themes/objectives. Detailed criteria/policies.	Residents of NDP area	Various	Feed into interim report.
Two workshop to consult on themes and policies	Jan 15	Feedback on draft themes and development of policy areas	Residents of NDP area	Attendees voted for themes and policy areas they thought most important	Feed into interim report.
Preparation of and consultation on interim report	Feb - May 2015	Feedback from the community on outcomes from the January workshops and proposed content of the NDP.	Residents of NDP area	Dissemination of interim report	Feed into draft NDP.
Parish Council annual meeting	May 2015	Inform community about progress with the NDP. Feedback from the community on proposed content of the NDP.	Residents of NDP area and wider Parish	Q&A at meeting	
Public consultation on draft NDP	Feb - April 2016	Obtain feedback from the community, statutory consultees and others on	Residents of NDP area Statutory	Responses to public consultation	Feed into final NDP prior to submission.

Activity	When	Aim of the activity/desired outcomes	Target audience	Method of recording/capturing feedback	Brief outcome summary and how the outcomes will be incorporated into the development of the NDP
		draft NDP.	consultees Other stakeholders Public		
Submission of NDP to SHDC	Summer 2016				
Submission of NDP to Independent Examiner	Autumn 2016				
Referendum	Winter 2016				

ANNEX to Engagement Strategy

Ugborough Neighbourhood Development Plan Communications Plan

The Working Group will provide regular updates and easily accessible, extensive information to the whole NDP area using publicity, public events/open meetings, local press, parish newsletter, leaflets drops, banners/posters and electronic and social media. The different methods of communicating outlined below will actively encourage the participation of the community at different stages in the development of the NDP.

Communications material

A standard set of communications material will be produced including power point slides, a flyer template and display boards.

Website

There will be an **Ugborough Plan** website with a link from the **Ugborough Parish** website. The website will include information on the following:

- what neighbourhood planning is about
- why Ugborough is producing a NDP
- the Ugborough NDP Working Group
- how the NDP will be produced
- how the community can be involved

The website will also have a Blog, allowing the Working Group to communicate news and views and enabling the community to comment on specific topics, with links to social media, such as Facebook and Twitter.

Facebook

There will be an **Ugborough Plan** Facebook page which will allow the community to post comments and questions.

Twitter

There will be an **Ugborough Plan** Twitter account which will allow the community to post comments and questions.

Posters/Outdoor media

Posters and other outdoor media will be put up at various points throughout the NDP area at specific times to:

- Inform the community of how they can be involved e.g. through social media.
- Inform the community of specific engagement activities and events.

Flyers

Flyers will be delivered to every household in the NDP area and made available at Ugborough Sustainable Saturdays to:

- Inform the community of how they can be involved e.g. through social media.
- Inform the community of specific engagement activities and events.
- Provide information on specific topics.

Parish Newsletter

Progress updates will be included in the monthly Parish newsletter.

Open meetings

Open meetings will be held at key stages of the development of the NDP allowing residents in the NDP area to comment on the NDP as it develops and ask questions. These will be widely advertised within the NDP area, well in advance of each meeting.

Direct contact

A network of people, which may include members of the community not in the Working Group, will spread information by word of mouth, taking responsibility for a particular part of the NDP area with the aim of reaching all residents.

Annexes

All annexed documents can be found as separate documents.

ANNEXES	ANNEX TITLE (FILE NAME)
1	Application for designation of the Plan Area
2	SHDC Approval of NDP Area
3	Application for Front Runner grant
4	Questionnaire to Parish residents, January 2013
5	Press Release regarding Roadshows September 2013
6	Questionnaire July 2013 Fair Day
7	Car Park Survey
8	Youth Group Survey, December 2013
9	Questionnaire, Ugborough Fair July 2014
10	Minutes from NDP Working Group Workshop September 2014
11	Display Banners
12	Flyer promoting January Consultation Workshops
13	Organisation of the January Consultation Workshops
14	The Interim Report, April 2015.
15	Flyer promoting Public Consultation of pre-submission NDP
16	Poster promoting Public Consultation of pre-submission NDP
17	Parish Newsletter notice of Public Consultation of pre-submission NDP
18	Ivybridge Gazette announcement of Public Consultation of pre-submission NDP
19	Individual responses to Regulation 14 consultation
20	South Hams District Council response to Regulation 14 consultation
21	June 16 Parish Newsletter notice post Regulation 14 consultation
22	South Hams District Council response to Regulation 16 consultation