

IVYBRIDGE NEIGHBOURHOOD PLAN



Statement of Consultation

October 2016

**Submitted by the qualifying body:
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CONTENTS

1. Introduction
2. Legislative framework
3. The Ivybridge Neighbourhood Plan
4. Consultation undertaken earlier
5. Initiating the Neighbourhood Plan Process
6. Neighbourhood Plan Consultation and Community Involvement

APPENDICES

Appendix 1 – Constitution / Terms of Reference

Appendix 2 - List of bodies and organisations consulted on the draft plan

Appendix 3 – Summary leaflet delivered to all households in the plan area

Appendix 4 – Summary of the on-line survey results

Appendix 5 – Response report including how the plan has changed as a result

SUMMARY

This consultation statement accompanies the Ivybridge Neighbourhood Plan at the point of its submission to South Hams District Council as local planning authority.

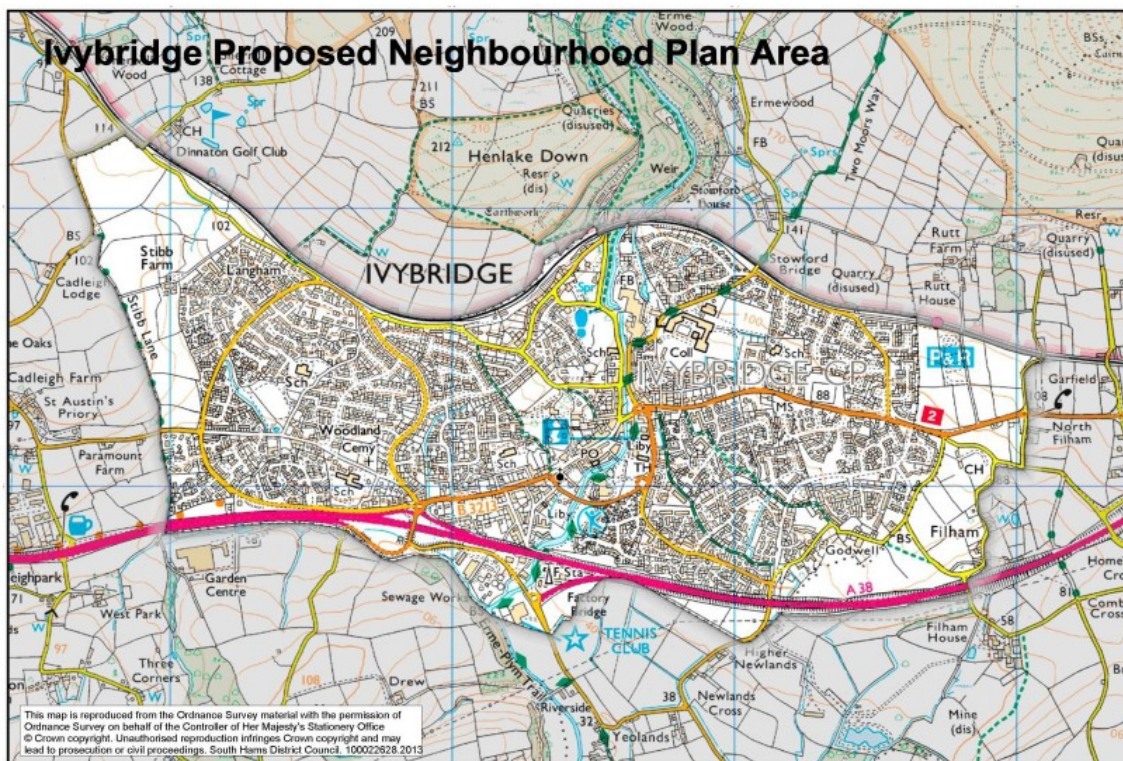
It meets the requirements laid down in the Neighbourhood Planning (General) Regulations 2012 (hereinafter referred to as “the Regulations”) and sets out:

- *details of the persons and bodies who were consulted about the plan;*
- *an explanation of how consultation was carried out;*
- *a summary of the main issues and concerns raised through the consultation;*
and
- *a description of how those issues and concerns have been considered and addressed in the plan.*

The steering group is grateful to the district council, other bodies and the local community for their help and involvement in shaping the plan.

INTRODUCTION

1. This statement sets out the way in which the consultation undertaken as part of the Ivybridge Neighbourhood Plan meets the requirements of the Regulations.
2. Ivybridge Town Council (ITC) is the qualifying body responsible for the preparation, consultation and submission of the neighbourhood plan. It has been assisted in the process by a steering group, focus groups and local consultants. The neighbourhood plan group's Constitution and Terms of Reference are at [Appendix 1](#).
3. The Ivybridge Neighbourhood Plan area has been designated as the whole of Ivybridge parish and a part of the adjoining parish of Ugborough. The area included within Ugborough parish is that part of the parish where development adjoining Ivybridge is proposed in earlier plans (the Ivybridge Site Allocations Development Plan Document – February 2011).



LEGISLATIVE FRAMEWORK

4. Part 5, paragraph 15 of the Regulations sets out the requirements for the qualifying body (Ivybridge Town Council) to submit the plan to the local planning authority, thus:

15 — (1) Where a qualifying body submits a plan proposal to the local planning authority, it must include –

- (a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates;*
- (b) a consultation statement;*
- (c) the proposed neighbourhood development plan; and*
- (d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.*

This document fulfils requirement (b).

5. Section 15(2) of Part 5 of the Regulations sets out what a consultation statement (such as this one) should contain:
- *details of the persons and bodies who were consulted about the plan;*
 - *an explanation of how consultation was carried out;*
 - *a summary of main issues and concerns raised through the consultation; and*
 - *a description of how those issues and concerns have been considered and, where relevant, addressed in the plan.*

6. This statement meets those requirements, particularly in that part of the statement at para's 29-36 below.

THE IVYBRIDGE NEIGHBOURHOOD PLAN

7. Ivybridge is a town of about 12,000 population lying about 10 miles east of Plymouth. It grew up on the southern slopes of Dartmoor, initially as a mill town and a staging post, then very rapidly in the latter part of the twentieth century following its designation as a location to help meet the demands for post-war growth.
8. The town's facilities have not always kept up with the pace of growth in Ivybridge and the plan aims to address this issue, particularly seeking the regeneration of the town centre.
9. The neighbourhood plan for Ivybridge is based on the Vision produced by the local community early in the plan-making process:

Ivybridge
***A friendly mill town - along the river, beside the moor -
offering healthy, creative, sustainable future lifestyles***

10. The plan includes a range of objectives under several headings:
- **Transport and Movement** – seeking more sustainable travel and movement, better air quality and improved access for all.
 - **Sport, Leisure and Tourism** – seeking to grow the town's good sporting reputation and enhance visitor experience.
 - **Employment** – seeking to boost local job creation and investment.
 - **Shopping and Town Centre** – seeking major regeneration and investment, particularly in the town centre.
 - **Community** – seeking better community infrastructure, including improved access to the river.
 - **Environment** – seeking to protect and enhance historic and green assets
11. The local community has shaped the plan, as is described below, and its policies and priorities respond to the issues and aspirations they have raised.

CONSULTATION UNDERTAKEN EARLIER

12. Over recent decades the people of Ivybridge have sought to address the needs of the growing town. Ivybridge Town Council has been particularly proactive in working to redress deficiencies in provision and to secure a strong future for the town. Much had been accomplished before neighbourhood planning entered the statute book. Some of that earlier work has been particularly helpful in shaping the plan and it is summarised below.

The Prince's Foundation's Community Plan

13. In Spring 2011 Ivybridge Town Council approached The Prince's Foundation to deliver a community plan based on the adopted South Hams LDF Development Plan Document of 2011. The request was driven by a number of issues of which the main ones were:
 - Developer interest in the eastern extension
 - Health Centre provision within the town
 - The aspiration to see the town centre regenerated.
14. In July 2011 the Foundation hosted a two day scoping event with stakeholders, including residents, councillors and the local planning authority. Over 70 key stakeholders attended during the two days. Issues identified included that the community should be involved in developing the plan and that there should be a single plan for the town rather than two.
15. In early August 2011 a planning reset meeting was held with developers, local GPs and the town, district and county councils to help identify a location for the new health centre. An Enquiry by Design event was also proposed by The Prince's Foundation.
16. In November 2011 a four day Enquiry by Design was held. The process was promoted by means of a flyer, which was delivered by volunteers to every household in Ivybridge (some 4,500 properties) and to homes on the eastern edge of the town (that part of Ugborough Parish where the "eastern development" is allocated). Capacity audiences of around 220 attended each of the two public meetings, and well over 350 suggestions, concerns and aspirations were recorded on the first evening alone.
17. It was also recognised that not everyone might have been able to attend the local meetings and that for some it might be difficult to fully understand or engage with the issues, so consultation with specific groups was undertaken, including with the Memory Café and at Waterside House (accommodation for the elderly).
18. Results and proposals were presented to the public at an open meeting and were then developed into an exhibition with display boards, a questionnaire and a comments book. This was hosted in The Watermark in December 2011 / January 2012 and was promoted by posters and an article in the local free paper delivered to all households.
19. The approach taken by The Prince's Foundation, the results of consultation carried out, and the community plan proposals and recommendations can all be seen towards the foot of the page at <http://www.ivybridge.gov.uk/local-information/planning/future-plans>.

The Town Team's Town Plan

20. When it became apparent that The Prince's Foundation's proposals and recommendations for the town centre were not wholly acceptable to the local planning authority, the local MP, Gary Streeter, stepped in to convene a Town Team and move things forward. Supported by some of the government's Portas funding, a group of representatives came together to develop a plan for the town (see more at <http://www.ivybridge-devon.co.uk/town-team.htm>). This was tested at public meetings and the Town Team group, with the local planning authority, commissioned the Retail and Leisure Report published in May 2013 (at <https://drive.google.com/file/d/0B0tFnG3oBkyBdVJnTmdRSHVrVUk/edit>).
21. The final Town Team plan was presented by Gary Streeter MP at a public meeting in the Watermark in December 2013, when around 60 people attended. This can be seen at <http://www.ivybridge-devon.co.uk/town-team/pdf/201312-ivybridge-town-plan.pdf>.

Other local consultation

22. In 2014 the Town Council wished to continue building on the consultation work and undertook a general community project to understand what drew people to live in Ivybridge and their view of the town, both now and hopes for the future. The work was supported under the government's Our Place programme.
23. A questionnaire was prepared, including a version in Makaton to enable students from Dame Hannah Rogers School and also younger children to participate. The work was co-ordinated and led by Hannah Whiting, who was studying the community of Ivybridge as part of her degree. Hannah also conducted some follow up one to one meetings. Her thesis is available to view at the Town Hall and the feedback from the survey work helped to create the Vision for the Ivybridge Neighbourhood Plan.

INITIATING THE NEIGHBOURHOOD PLAN PROCESS

24. Following on from the earlier work of The Prince's Foundation and the Ivybridge Town Team, Ivybridge Town Council took the lead to begin neighbourhood planning for Ivybridge. The town council is the appropriate "qualifying body" under the Regulations, and it acted quickly to begin the process following enactment of the relevant legislation.
25. A constitution and terms of reference were set by the town council as a governing framework for the plan process. This can be seen at [Appendix 1](#).
26. The town council quickly went on to establish a steering group to guide the production of the neighbourhood plan for Ivybridge. The steering group draws together representatives from key bodies and organisations across the town. Records of its meetings can be found at <http://www.ivybridge.gov.uk/local-information/neighbourhood-plan>.
27. The steering group's formation was announced in the town and in the local media, and its members began to consider how best to draw up the plan and secure community engagement in and ownership of the process.
28. The approach taken to the neighbourhood plan also aligns with the principles of the town council's Community Engagement Strategy which was adopted in 2010, amended in 2014 and is available at <https://drive.google.com/file/d/0B0tFnG3oBkyBWktfWUI6UkJbkE/view>.

NEIGHBOURHOOD PLAN CONSULTATION AND COMMUNITY INVOLVEMENT

29. It was decided to form two focus groups to concentrate on complementary aspects of the plan. The topic areas for the groups, derived from the Vision for Ivybridge, were:
 - Regeneration and Investment, and
 - Healthy, creative, sustainable lifestyles
30. The focus groups ran for a period in early 2015. Results of their meetings and work can be seen at <http://www.ivybridge.gov.uk/local-information/neighbourhood-plan> and have particularly influenced the plan's objectives.
31. The draft neighbourhood plan was based on the outcomes of the focus groups' work, the earlier work of The Prince's Foundation and the Town Team, the local strategic context and prevailing national requirements.
32. The draft Ivybridge Neighbourhood Plan was publicised and made available for consultation in accordance with Regulation 14 of the Regulations, from 6th July to 21st August 2015. The

plan and supporting documents were made available at the town council website. This was supported by a small sub group who developed a Facebook page (launched on 17th June 2016, visit <https://www.facebook.com/IvybridgeTC>) and social media strategy including Q codes and twitter feeds. Hard copies of the draft plan were also made available for inspection at the Town Hall and in The Watermark.

33. Those consultation bodies prescribed in paragraph 1 of Schedule 1 of the Regulations were consulted, along with other relevant local groups and organisations. A copy of the consultation letter/email and details of those bodies and organisations to which it was sent are at **Appendix 2**.
34. Extensive local consultation also took place at the point of the draft plan's publication. This included:
 - an advertisement announcing the start of the consultation period at the Lions Funday was published in the free Ivybridge magazine delivered to all households in the plan area over the weekend of 27/28 June 2015. This was supplemented by posters on public noticeboards, in shops, schools and health centres.
 - the launch of the plan at the annual Lions Funday event in Ivybridge on 4th July 2015, when steering group members were in attendance to encourage involvement and feedback.
 - a leaflet which summarised the draft plan and was delivered to every household with the free Ivybridge magazine. The leaflet is at **Appendix 3** and is also available at <https://drive.google.com/file/d/0B0tFnG3oBkyBeEFadElyQXdwQk0/view?pref=2&pli=1>.
 - an exhibition in The Watermark, and exhibition boards at the Town Hall and in other local destinations (schools, supermarkets, clinics).
35. An on-line questionnaire survey (using Survey Monkey) gathered views about the plan's content. A summary of the responses received is at **Appendix 4** and is also available at <https://drive.google.com/file/d/0B0tFnG3oBkyBNGxiM0FRUHE0U3M/view?pref=2&pli=1>.
36. The responses received from consultees and other comments on the draft plan apart from the on-line survey have been summarised in a response report which is available at <https://drive.google.com/file/d/0B0tFnG3oBkyBMWRkSjdqVW5DR1U/view?pref=2&pli=1> and also forms **Appendix 5**. The response report also records how the comments made and issues raised have been dealt with in the submitted plan.

APPENDIX 1

IVYBRIDGE NEIGHBOURHOOD PLAN STEERING GROUP TERMS OF REFERENCE / GOVERNING DOCUMENT

1. Name

The name of the Group shall be THE IVYBRIDGE NEIGHBOURHOOD PLAN STEERING GROUP (hereafter referred to as “The Group”).

2. Mission statement

‘A community based group working in partnership to contribute to a Neighbourhood Plan for Ivybridge covering the area designated by South Hams District Council of the Parish and the land known as the “eastern area extension”.

3. Objectives

The Group shall be non-party in politics and non-sectarian.

To ensure the production and delivery of a Neighbourhood Plan for Ivybridge, and to take part in the DCLG programme.

To communicate findings, ideas and approaches for the Neighbourhood Plan to the Town Council and work in partnership with District and County Councils.

To secure funding or identify funding streams to support the development of the plan.

To consult with, and involve the community in the development of the plan, with a view to securing support at a referendum.

Identify areas, or specific sites, to accommodate the necessary development, in accordance with the LDF.

Promote growth that is suitable for the Ivybridge Neighbourhood area as part of maintaining a balanced and thriving community.

Produce appropriate timescales and delivery mechanisms for the Neighbourhood Plan

To take the Neighbourhood Plan to adoption by South Hams District Council.

4. Membership and Meetings

The Group shall consist of –

Not less than ten (10) members and no more than fourteen (14) in total each of whom shall have one vote, who shall be as follows:

Ivybridge Town Councillors (2)

South Hams District Councillors (3)

Devon County Councillor (1)

Ugborough Parish Council (1)

Voluntary sector / local residents / specialist advisors (7)

The Committee will meet as often as it shall decide, with a minimum of five clear working days notice given prior to a meeting taking place.

A quorum shall be declared when a minimum of 7 members are present. All decisions shall be

arrived at via voting amongst those voting members present; the Chairman (who will be elected at the first meeting) shall have a casting vote.

In addition the Committee shall have the power to co-opt individuals (as non-voting members) on an ad hoc basis.

The Group may appoint topic groups to operate on its behalf. Involvement in the topic groups shall be open to all people who live, operate a business, or hold a specific interest in the Ivybridge Neighbourhood Plan area, and will be expected to exercise balanced consideration for the needs of all aspects of the local community.

The public and the press may attend meetings of the Group but at any such meetings the public and press can be instructed to withdraw if a majority of the Group present vote that it is advisable in the public interest that they do so in view of the sensitive or confidential nature of the matter about to be discussed.

5. Finances

Ivybridge Town Council shall act as the accountable financial body for the Group.

6. Administrative Support

Administrative support shall be provided by Ivybridge Town Council who will attend all meetings in a non voting capacity and will arrange for notes to be provided to members of the Steering Group within 10 days, and to members of the public within 21 days.

7. Terms of Reference/Governing Document

This document shall only be amended by resolution passed by the majority of those members attending a Group Meeting. Notice of proposed amendments to this document must be submitted to the Secretary/Co-ordinator for circulation to members not less than 21 days before such a meeting.

8. Conflict of Interest/Affiliations

A "Conflict of Interest" might occur where there would be a personal financial gain or benefit to an individual or business. This is known as a pecuniary interest and must be declared. However it is recognised that this Group is an advisory body, not a statutory decision making group, but individuals should declare any interests at the outset and these should be publicly available.

Organisations and businesses may assist in the production of the Neighbourhood Plan and may contribute to the cost of producing it. Details of any donations or assistance must be made publicly available and must not influence the recommendations of the plan.

9. Standards of Conduct

Members of the Group are required to comply with the following standards of conduct.

Show respect for fellow members views during meetings:

Act in a courteous manner when representing the Group in communicating with members of the public and when attending internal and external meetings.

Accept and abide by decisions in a positive and constructive manner.

Do not represent "personal" views to the Press or media.

It may be necessary to maintain confidence on some documentation received in the consultative processes of the Committee – those situations will be made clear.

Maintain confidence in relation to individual members views expressed in the course of the meetings.

Failure to comply

The Chair will be required to consider any complaints as to breaches of these guidelines and will take necessary action to address any breaches.

The sanctions available to the Chair will range from the opportunity for remedial action to expulsion from the Group.

IVYBRIDGE NEIGHBOURHOOD PLAN –TERMS OF REFERENCE

Purpose of the Group

Ivybridge Town Council is designated as a qualifying body for the purposes of applying for a Neighbourhood Area and to undertake a Neighbourhood Plan.

The Town Council endorsed the application at its meeting on 4th February 2013.

Objectives of the Group

Ivybridge Town Council wishes to take advantage of the legislation to develop its own Neighbourhood Plan and in the past has produced its own informal Vision for the Town, which has been submitted to the District Council to be considered alongside the formal Development Plan process.

The Town Council submitted an application to the Princes Foundation, in conjunction with South Hams District Council, in April 2011 to be considered for early DCLG funded support and to enable a Neighbourhood Plan to be prepared. As this preceded the passing of the Localism Act the earlier steps, such as applying for a Neighbourhood Area, were not part of the process at that time so some backtracking has been necessary to incorporate all the work done to date into one formal plan. The work will be done in conjunction with the Ivybridge Town Team and will look particularly at those areas identified for development in the DPD for Ivybridge, but will also explore opportunities on other sites which have emerged since that time such as Stowford Mill.

The Town Council will take the lead and initially worked in partnership with Ivybridge Town Team to ensure a coherent approach to the process, but this process will now be driven by the Ivybridge Neighbourhood Plan Steering Group.

Membership and Governance

Who are the Members of the Group?

Ivybridge Town Councillors (15) are Members of the group supported by the Town Clerk and staff. (Ivybridge Town Council has full standing orders available which govern its operation alongside its legal position as a local council)

Ivybridge Neighbourhood Plan Steering Group comprises the list attached – the membership may change slightly but will have a maximum of 14 members.

What are the roles and responsibilities of individual Members?

Within the Town Council Members have various responsibilities and are split into committees as well as some having a specific role in relation to issues such as transport. The Mayor and Chairman of Planning and Infrastructure Committee represent the Town Council on the Steering Group in

order to feed back to the Council as necessary.

What arrangements are in place for bringing in replacement and/or additional Members?

The Town Council is required to advertise any Councillor vacancies when they arise and follow the electoral process.

Any Steering Group resignations would be considered by the group and replacements endorsed by the Town Council.

How will declaration of interests be managed?

Declaration of interests is overseen by the Monitoring Officer at South Hams District Council. The Steering Group will retain the same procedures as the Town Team but as an advisory group it has no powers to make decisions.

If voting is required, what voting arrangements are in place?

As per the Standing Orders. It is anticipated that for the Steering Group that the Chairman would endeavour to work on a consensus basis but if a vote is called it is a simple majority.

Which decisions will be referred to the parish/town council?

The Town Council will ultimately take the decision as the group taking the lead on the Plan.

What procedures are in place for dealing with conflict resolution?

The Town Council has its own standing orders to deal with such issues and any that are unresolved in the Steering Group which were pertinent to the Plan process could be forwarded on to the Town Council with caveats about any unresolved issues.

Reporting and Feedback

How will the Group share information with the community?

The Town Council has already developed a part of its website www.ivybridge.gov.uk to deal with future planning and it already does regular newsletters and events. The Princes Foundation work successfully engaged over 200 people in the planning for the town, which followed a leaflet drop through every door in the town by community volunteers. A regular column in the Ivybridge magazine is being developed and the Town Team co-opted the editor of the magazine to the group to assist in publicising its work – this has been repeated by the Steering Group.

Town Council has public participation sessions and is a Quality Council which indicates that it has achieved the relevant standards for engaging with the community.

How will minutes of meetings and feedback from events/consultations be recorded and made available?

Town Council minutes are on our website and often reported by the local media. Also see above.

Resources and Finance

How will the project be funded?

The initial Princes Foundation report which offered proposals for the eastern area of the town and the town centre was funded through DCLG and private sector sponsorship, costing in the region of £50,000. That report forms the basis of the work for the Neighbourhood Plan and this is also being supplemented by the Retail and Leisure study (commissioned by South Hams District Council with support from Ivybridge Town Council frontrunners funding and Town Team Portas money). £15,000 of the frontrunners money remains to commission other studies and DCLG have offered

an additional £7000 to organisations in this situation. The Town Council also commissioned its own study of the Stowford Mill site paid from precept and other funding schemes to support other stages such as the referendum are available to the District Council.

Are any additional resources required?

The situation will be assessed and opportunities taken to access money as the requirements are identified, but where possible use of own resources and local expertise will be utilised to supplement external funding.

Monitoring and review

How will the plan be monitored?

A future timeframe with monitoring will be produced at an early Steering Group meeting.

APPENDIX 2


LIST OF BODIES AND ORGANISATIONS CONSULTED ON THE DRAFT PLAN

REG 14 list of “consultation bodies”	INP consultee list
(a) where the local planning authority is a London borough council, the Mayor of London;	NA
(b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;	South Hams District Council Devon County Council Devon County Council Public Health Dartmoor National Park Authority Ugborough, Ermington and Sparkwell Parish Councils Harford Parish Meeting
(c) the Coal Authority(a);	NA
(d) the Homes and Communities Agency(b);	✓
(e) Natural England(c);	✓
(f) the Environment Agency(d);	✓
(g) the Historic Buildings and Monuments Commission for England (known as English Heritage)(e);	✓
(h) Network Rail Infrastructure Limited (company number 2904587);	✓
(i) the Highways Agency;	✓
(j) the Marine Management Organisation(f);	✓
(k) any person— (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;	Mobile Operators Association British Telecom
(l) where it exercises functions in any part of the neighbourhood area— (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(a) or continued in existence by virtue of that section; (ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(b); (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(c); (iv) a sewerage undertaker; and (v) a water undertaker;	NHS Devon NEW Devon CCG, Western Locality NHS Devon and Devon PCT Western Power Distribution Wales and West Utilities British Gas Connections South West Water
(m) voluntary bodies some or all of whose activities	South Hams CVS

benefit all or any part of the neighbourhood area;	Ivybridge Senior Council Ivybridge U3A
(o) bodies which represent the interests of different religious groups in the neighbourhood area;	Churches together in Devon
(p) bodies which represent the interests of persons carrying on business in the neighbourhood area; and	Ivybridge chamber of Trade Local businesses and property owners
(q) bodies which represent the interests of disabled persons in the neighbourhood area.	DOVE project and Stairways (for people with learning disabilities) South Hams Lifestyles Ivybridge Caring and Memory Cafe
Other bodies	Sport England Visit England Ivybridge Community College Friends of Ivybridge Library PL21 and Ivybridge Environmental Action Group Sustrans representative Ivybridge Theatre Company Ivybridge Heritage Group Probus Club

APPENDIX 3

DRAFT PLAN SUMMARY LEAFLET DELIVERED TO ALL HOUSEHOLDS



Ivybridge
Our Neighbourhood Plan

A plan for the people of Ivybridge,
by the people of Ivybridge

Why is this different to other plans?

This is a plan for the people of Ivybridge, put together by the people of Ivybridge. It isn't a plan for developers or bureaucrats – it's a plan for you.

What difference will this plan make?

Amazingly, if the people of Ivybridge support the plan it will take its place as the key part of the framework used to decide planning decisions in the town. It really will make a difference.

How does it work?

The government has given local communities more power to decide what should happen in their local areas. It's all part of what they call 'Localism', and Ivybridge is among the front runners making the most of the opportunity.

Please help to make sure we get it right



What does the plan do?

The plan draws together hopes and dreams, worries and concerns, and comments and opinions of the local community. It aims to help make and keep Ivybridge

A friendly mill town – along the river, beside the moor – offering healthy, creative, sustainable future lifestyles

People from across the community have already taken part in meetings, focus groups and other events to help shape the plan.





What's the main thrust of the plan?

The plan aims to focus new investment in the town centre, including a new health and leisure hub and a refreshed shopping centre. Attractive new public spaces and much more access to the river are planned. Improved sports, leisure and arts facilities are also proposed. Traffic congestion and air quality issues are to be tackled, and Ivybridge's historic and natural assets will be cherished and protected.



The full text of the 8 policies setting all of this out in detail can be found in the draft plan which is on the Town Council website or available to look at in The Watermark or Town Hall.



How can I be part of it?

The plan is open for comment for **6 weeks** until **21st August 2015**.

You can comment on-line, by questionnaire, or by writing to us. Contact details are shown below.

There will be further events and meetings too, and the plan will be amended to make sure it's the plan the people of Ivybridge want.



To comment on-line visit - www.surveymonkey.com/r/XSCBJP8

What happens next?

After the consultation the plan will be looked at by an independent examiner to make sure that it has been put together properly and will work in practice. Then a referendum will be held to make sure that the people of Ivybridge are behind the plan.

Finally, so long as the examination and referendum have gone smoothly, the plan will be adopted by the local planning authority (South Hams District Council) and will begin to be used to guide future planning of our town.

Please show support for the plan by replying to this consultation and voting **YES** in the referendum in 2016.

Thanks for being part of the plan for our town!

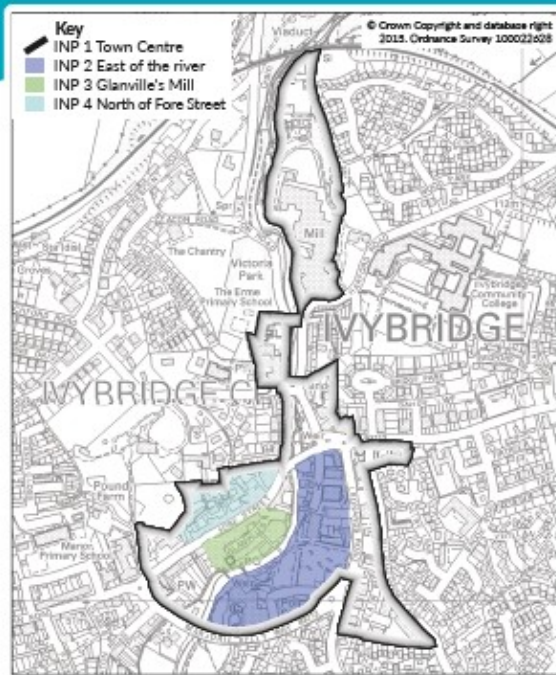
Please let us have your views - what have we missed, what is good and how we could improve the plan

Drop any comments into The Watermark where the plans will be on display
www.ivybridge.gov.uk/local-information/neighbourhood-plan
Email - townclerk@ivybridge.gov.uk



www.facebook.com/IvybridgeTC





What does the plan say will happen in the town centre?



- **ACROSS THE CENTRE** – Development will promote vitality, viability and retail health.
- **IN FORE STREET** – Traffic flow will be reversed and gateway entrances at either end of the street will be enhanced.
- **IMPROVEMENTS** – A new town square, improved public transport and parking, better access for all, public art, conservation and local events.
- **THE RIVER ERME** – There will be better access to and across the river.
- **EAST OF THE RIVER ERME** – Development will provide a health and leisure hub, hotel and restaurant, retail and office development.

- **NORTH OF FORE STREET** – There is scope for redevelopment to improve shopping and provide for mixed uses.
- **ON THE GLANVILLE'S MILL SITE** – Redevelopment will provide improved shopping and mixed uses.

What will be the main changes in the town centre?

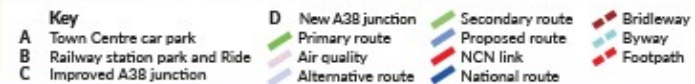
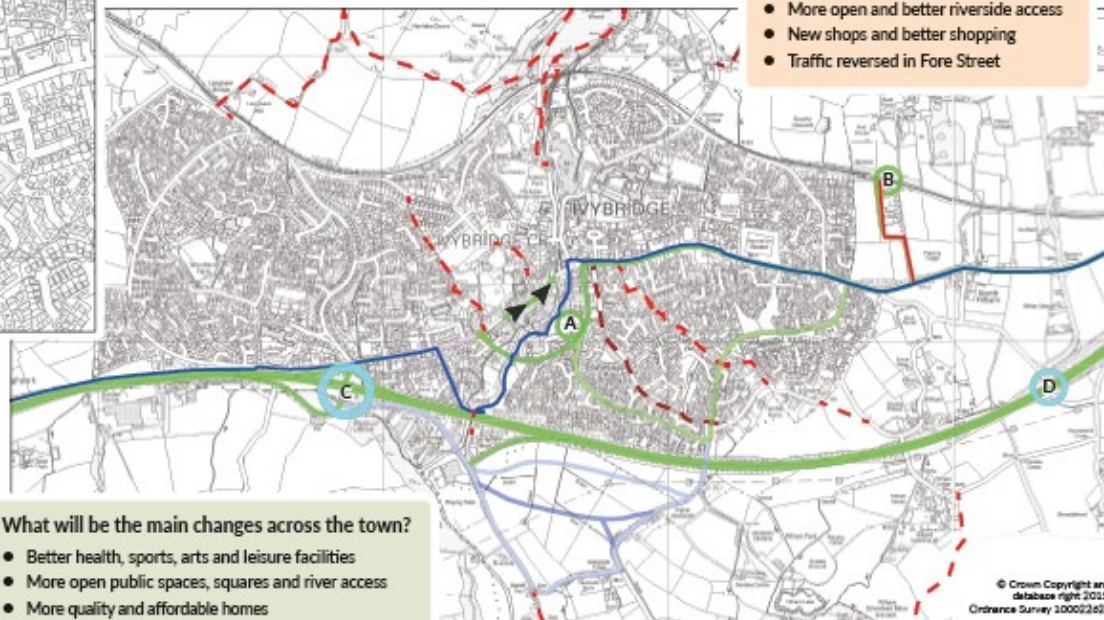
- A better and livelier town centre
- A new health and leisure hub east of the river
- More open and better riverside access
- New shops and better shopping
- Traffic reversed in Fore Street

What does the plan say will happen across the town?

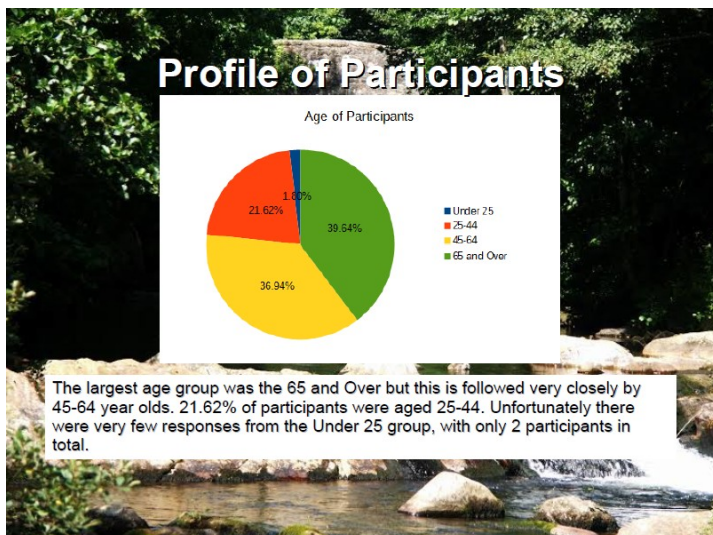
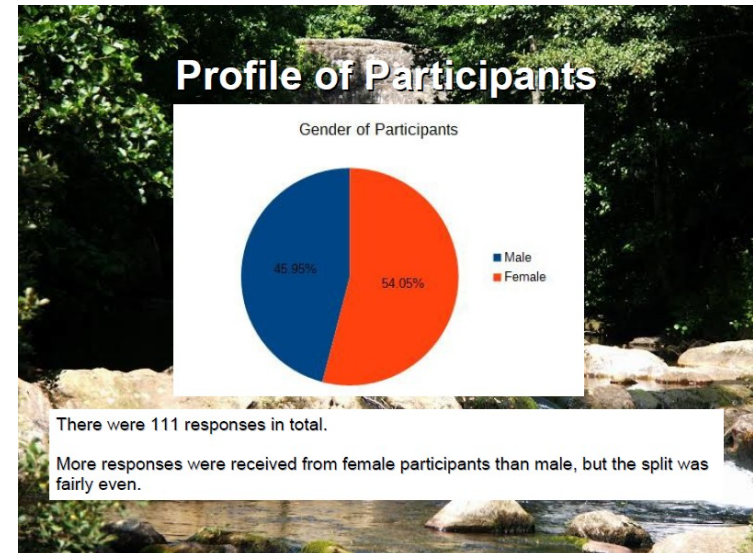
- **IMPROVED COMMUNITY FACILITIES** – Enhanced sports facilities, a new swimming pool, more provision for young people, better arts facilities and improved cycle routes.
- **HOUSING AND JOBS** – New housing will be to high design and eco-standards and will include affordable homes, lifetime homes and job creation.
- **TRAFFIC AND MOVEMENT** – Improved access to and junctions with the A38, a relief road to reduce town centre congestion and improve air quality, and improved cycling and walking are proposed.
- **THE ENVIRONMENT** – The town's historic and natural assets will be conserved, open spaces protected, woodlands managed and the river and watercourses safeguarded.

What will be the main changes across the town?

- Better health, sports, arts and leisure facilities
- More open public spaces, squares and river access
- More quality and affordable homes
- More job opportunities
- Traffic and transport improvements by 2021
- Improved quality of life



APPENDIX 4
SUMMARY OF THE ON-LINE SURVEY RESULTS



The full summary presentation is available at <https://drive.google.com/file/d/0B0tFnG3oBkyBNGxiM0FRUHE0U3M/view>.

APPENDIX 5

RESPONSE REPORT INCLUDING HOW THE PLAN HAS CHANGED AS A RESULT

DRAFT IVYBRIDGE NEIGHBOURHOOD PLAN – RESPONSE REPORT (June 2016)

Policy / para no	Name	Rep' no	Summary of Comment (original available for inspection)	Response
General comments				
General	South Hams District Council		The LPA fully supports the initiative to produce a Neighbourhood Plan and recognises the extent of work and community involvement undertaken, commending the group for all the hard work already put into the plan.	Support welcomed.
			The scope of a neighbourhood plan depends on a number of factors. These include what is already covered in the development plan and its status, the expected level of future growth for the area, the key issues for the community, what they wish to engage with and their preferred outcomes. It can be detailed, including allocating land for future growth, set general principles for development or focus on a few key issues.	The plan will be amended to make its relationship to existing and emerging plans clearer, with reference made to what is known about the anticipated level of future growth.
			The LPA notes the plan's focus on the town centre. It suggests that the plan should state that this focus is not intended to undermine the existing local plan or the need to plan for growth to meet future needs.	The plan will be amended to make it clear that the focus on the town centre does not aim to undermine the existing adopted plan or the need to plan for growth to meet future needs.
			The community may wish to engage with future growth through a review of the neighbourhood plan or by alternative mechanisms the LPA may put in place as it prepares Our Plan.	Any need to review the plan will become clearer as Our Plan is progressed. Meanwhile, the local community wish to progress the neighbourhood plan without delay in order to address the priority needs of the town centre.

General	South Hams District Council		The LPA has made a number of suggestions for further consideration prior to submission of the draft plan to help ensure its success at examination. The plan contains sound aspirations but lacks detail as to how they will be achieved, evidence to support them or development opportunities to enable their delivery. The plan must be realistic and deliverable.	The need for a realistic and deliverable plan is agreed and the LPA's support in attaining this is welcomed.
			The main areas of concern are: The plan does not take up the government's challenge to local communities to help shape growth and allocate land for housing.	1. It is not a requirement that land be allocated for housing but that sustainable development be delivered. It will be made clear that the plan does not aim to constrain growth but that its focus is the regeneration of the town centre.
			The scope of the plan in the context of an emerging local strategic development plan with a similar plan period. This could trigger an early review and/or prejudice the community's right to engage in shaping future development through a neighbourhood plan	2. The relationship with Our Plan will be clarified in light of progress made and information available at the time.
			The relationship between the Draft INP and the adopted development plan for the South Hams, including the Ivybridge DPD (Feb 2011) and emerging Our Plan	3. The relationship to the adopted development plan will also be clarified.
			The need to look at ways to build on the town's unique identity and assets to support the Draft INP vision and objectives and reflect this in policy	4. The vision and objectives have been shaped by the community and it will be important not to fundamentally change them. Ways to strengthen their purpose and delivery in policy will be explored.
General	South Hams District Council		The definition of the town centre does not accord with the National Planning Policy Framework (NPPF) and the existing development plan	5. The defined extent of the town centre will be re-examined.

			The relationship between the neighbourhood plan and the Ivybridge DPD (Feb 2011) where policy is not consistent, for example in respect of land to the east of the River Erme.	6. The plan will be brought in line with the adopted DPD.
			The lack of development proposals and opportunities to deliver the NP policies	7/8. The plan identifies a range of development opportunities in the town centre and these, in combination with developments proposed elsewhere in the town, will enable policy delivery.
			Whether the NP policies are viable, deliverable and achievable.	
			Some overly restrictive policies may not contribute to the requirement for neighbourhood plans to positively support local development	9/10/11. It is not intended that policies be overly restrictive so that local development is not supported; nor that they be non-CIL-compliant. This will be carefully considered and any necessary amendments made to try to ensure that development, investment and regeneration can proceed.
			Policy requirements could place undue burden on development and impact on the viability and deliverability of housing, including sites allocated in the Ivybridge DPD (Feb 2011).	
			Policies may not be CIL compliant	
			The need for further evidence to justify many of the policy requirements	12. It is hoped SHDC can help to identify appropriate evidence to support the plan's policies, also bearing in mind that the views and involvement of the local community are a very important element of the plan's evidence.
General	South Hams District Council		The inclusion of a policy which requires a traffic and transportation study	13/14. The traffic and transport issues faced in Ivybridge are long-standing and well-known. It is considered that a holistic long-term study is an appropriate way to enable a
			The need to look at travel in an integrated way, and to take account of public transport, including the	

			railway, to build opportunities for Ivybridge	long-term strategy to be put in place to address them.
			The need to ensure that policies for sport and leisure reflect the South Hams Playing Pitch Strategy	15/16. It is hoped that the LPA can assist in ensuring that the plan fully reflects the South Hams Playing Pitch Strategy and embraces the role of green infrastructure.
			The need to fully consider the role of green infrastructure	
			The relationship between the objectives in the Plan and the policies which take these forward to deliver these objectives; and	The relationship between objectives and policies will be explained further.
			The need for clear and precise policies to ensure they are effective and can be used by a decision maker determining planning applications.	The LPA's support in producing effective policies will be welcomed.
			The LPA would welcome the opportunity to discuss their comments and further assist with the draft plan if this would be helpful.	
General	Devon County Council		As a main infrastructure provider the County Council has a key role in ensuring development proposals come forward in a sustainable manner and welcomes the opportunity to be involved in the production of the Neighbourhood Plan.	The County Council's continued involvement in progressing the plan is welcomed. Indeed, a further meeting has already taken place.
General	Environment Agency		Welcome the aspirations and objectives set out in the Plan, in particular those relating to improving the town's focus on, the access to and the health of the River Erme. Also provide advice and recommendations (below) to strengthen the plan from an environmental perspective.	Support and advice welcomed.
General	South West Water		No specific comments but feel free to consult us on any particular concerns going forward.	Comments welcomed.
General	Northern, Eastern and Western		We have sent your original email to NHS England, requesting that they correspond separately. Their Area Team contract with GP practices for core primary medical	The NHS Area Team's views and engagement in delivering the plan will be welcomed.

	Devon Clinical Commissioning Group		services and GP premises and therefore they will be interested to read of your plans to create a health and leisure hub incorporating new leisure and medical centres.	
General	Hannick Homes		<p>South Hams Core Strategy and the adopted Ivybridge Site Allocations DPD set out requirements for new housing and employment and allocate sites to meet these requirements in Ivybridge. In setting out a vision for the future of the town, the plan should make mention of these allocations.</p> <p>Suggested change: In Section 2 (Ivybridge Context) add text referring to Proposal I1 of the DPD and add a plan of the town showing the location of the proposal.</p>	<p>Although the plan “focuses first and foremost on the town centre with the aim of encouraging and enabling investment and regeneration at the heart of Ivybridge” (para 4.1) it is agreed that reference to the major developments already proposed would be helpful.</p> <p>The plan will be amended accordingly, including a map to show the extent of the town's projected growth for information purposes.</p>
General	Gladman		Gladman set out a lengthy exposition of the statutory framework for neighbourhood planning, a commentary on their view of the local development plan and its shortcomings, and a view that the neighbourhood plan fails to meet the statutory requirements, as set out in more detail below.	<p>Commentary noted.</p> <p>Views on the shortcomings of the local development plan and draft neighbourhood plan not accepted, for reasons set out in response to detailed comments below.</p>
General	PL21		Queries the plan's town centre focus, advocating that the plan lay down key development principles for the whole plan area.	Town centre regeneration is a clear priority for the plan, and policies INP 5-8 seek to establish principles across the plan area.
Foreword				
Foreword	South Hams District Council		For transparency, explain that the draft plan has been prepared by Lee Bray (MRTPI) on behalf of the INPG.	The consultant's role will be referred to, although not necessarily in the Foreword.
			Clarify that the INP will be used, alongside local and	Para 6 will be expanded to refer more

			national planning policy, to help determine planning applications.	explicitly to the plan's role in helping determine planning applications.
Introduction				
Introduction	South Hams District Council		Explain the plan's town centre focus and that it does not cover future housing growth and employment. Clearly state that it neither constrains development proposed in the adopted local plan nor restrains future growth to meet the development needs of the area.	Para 1.4 clearly states the plan's focus on the town centre. Additional wording will be added to explain that it does not seek to undermine or constrain existing or future planned growth.
			Refer to local strategic context with adopted local plan to 2016 and preparation of a new plan with a horizon to 2031 or later.	The relationship to the current and emerging local plans will be made clear although, since there is as yet little public detail of the new plan's content it has been impossible to engage with it as effectively as had been hoped.
			It would add clarity to explain how the document is set out. (beginning with the local context; then aspirations and objectives, which form the basis for the detailed planning policies which follow.)	Although the contents page sets out the document structure, text will be added to further explain how the plan is set out.
			A neighbourhood plan can focus on a small number of local concerns or provide policies across a wide range of issues. Local people decide what should be included. A NP area can extend beyond a parish boundary so long as it is included in the designated area.	The plan's town centre focus is what local people identified as the priority, concentrating on the priority issues that remain unresolved.
Introduction	South Hams District Council		It would be helpful to explain the role of the neighbourhood plan in the statutory planning framework. This would explain that when the preparation process is completed the INP will form part of the statutory development plan for the District, alongside the local plan (Our Plan) and national planning policy.	This is explained in the plan (at para 6 of the Foreword, and at para 1.2). The aim has been to keep the plan clear, succinct and user-friendly – not unnecessarily weighed down with technicalities.

Paragraph1.2		The regulations refer to an 'independent' examination rather than a 'public' examination.	Change word 'public' to 'independent' examination.
Paragraph1.3		This paragraph could be strengthened to better explain the purpose of the plan and what it is trying to achieve.	This is explained elsewhere. The aim is to keep the plan clear and succinct. No change.
Ivybridge NP Area map		Plan area must be clear.	Strengthen boundary edge on the map.
Para 1.4		It is important to be clear about the neighbourhood plan area, which includes a part of Ugborough parish.	Amend plan (mapping and text) to make this clearer. Also refer to the Ugborough Neighbourhood Plan
Para 1.6		Explain how community and stakeholders have been involved. Explain that more information about this is set out in the Statement of Consultation.	Amend para 1.6 accordingly.
Paras 1.10 & 1.11		Clarify information about the process of preparing neighbourhood plans and the key stages involved. Provide further detail to explain submission to LPA, formal consultation, examination and referendum etc.	Amend plan and include flow diagram.
Para 1.13		Clarify examination of neighbourhood plans.	Change word 'public' to 'independent examination'
Para 1.13		Neighbourhood Plans help shape development in an area but It is unrealistic to give the impression that the plan alone will guide and manage development in the town.	The text says that the plan will "help" make planning decisions. However, more can be added to emphasise that it will only be one part of the development plan.
Paragraph1.14	South Hams District Council	The LPA welcomes alignment of the NP with the plan period for 'Our Plan'. However, the 'Our Plan' period is under review and it would be helpful if the INP could reflect this (once agreed).	Update plan period to reflect revised 'Our Plan' plan period once it has been agreed by the LPA.
Page 7		Great photographs giving a real feel for the process. It would be interesting to add references?	Add captions.

Section 2: Ivybridge in Context				
General comment	South Hams District Council		Local context should include the local planning context (Ivybridge DPD Feb' 2011, saved policies from the 1996 Local Plan, the emerging Our Plan and relevant evidence).	Add section about the planning context. This will be included in the introduction.
General comment			The evidence base schedule does not include reference to ecology or heritage designations. The plan should refer to relevant designations (e.g. SSSI, conservation area, listed buildings, etc).	Include ecology and heritage related evidence and add reference to designations and their sensitivities.
Para 2.5			Use up to date evidence.	Amend plan to add reference to 2011 census and latest ONS figures.
Para 2.6			Include reference to all forms of transport – including the main line railway, bus services and cycling/walking.	The railway is referred to in para 2.4. This chapter aims to paint a broad picture only. No change.
Para 2.8			Reference is made to ‘a successful school’. Clarify if this means the secondary school and refer to its specialist sports status to qualify success.	Specify “a school with specialism in sports, sciences and languages” to add clarity and bring the plan up to date.
Para 2.10			Be more specific about the changes to help secure the town’s future. Reiterate the plan's town centre focus.	Amend plan accordingly.
Section 3: Vision and Objectives				
General	South Hams District Council		These objectives are supported in principle. However, the links to evidence need to be strengthened to provide a robust basis for the policies which follow.	The objectives are those set down by local focus groups. The plan will be expanded to clarify this as their basis in evidence.
General	South Hams District Council		SHDC makes many points (below) concerning the NP objectives, raising varied concerns.	The objectives are aspirations set down by local focus groups. The plan will be amended to more fully explain this. The community's aspirations will be used as the basis for a new set of objectives expressed to help show how the policies

			have been shaped, and better able to be measured and monitored. Suggestions made by SHDC will also be incorporated where they align with the community's set objectives.
Transport & Movement Objectives		Should include reference to the railway. The railway does not feature on the 'Transportation' map (page 20).	Add reference to the railway in set objectives. Include railway on Transportation map.
		It is important to quantify what 'much more' cycling and walking and 'many fewer' car journey's means.	Add reference to a shift in travel patterns in favour of non-car modes as part of the plan's monitoring framework.
		Although the key issues identified for the transportation study may reflect community views, it is important to provide evidence that these are the key issues for transport in the town. A transportation study could identify the key issues and make recommendations about how to address them.	Community views are key evidence. However, the suggestion that a study should aim to identify key issues is helpful and the plan will be amended accordingly.
		Include 'an integrated travel plan' as a key issue for a transportation study to consider (including reference to bus and rail links).	This is helpful and the plan will be amended accordingly.
Transport & Movement Objectives	South Hams District Council	Include objective about how to build on opportunities for tourism and increasing local visitors to town based on travel links, including bus and rail.	This is helpful and the plan will be amended accordingly.
Sport & Leisure Objectives		These establish some good principles around the promotion of sport and leisure, but could also include; 37. Parks and accessible natural spaces (e.g. nature reserves, community orchards, accessible	This is helpful and the plan will be amended accordingly.

		woodlands) 38. Public rights of way, permissive paths and unclassified county roads to promote access to the surrounding countryside and moor.	
		South Hams are preparing a template to help towns and parishes prepare Open Space, Sport and Recreation Plans. This could inform and provide evidence for the plan.	Ivybridge Town Council are already working closely with SHDC on these matters and will continue to do so.
SLT Objective 1		It is important to be able to measure these objectives.	Develop a monitoring framework for the plan.
SLT Objective 2		The reference to catering for any talent or chosen sport or activity is ambitious. There is no indication of how this could be achieved. Rewrite with a more realistic and achievable objective.	This is the objective set by the community. It will now sit with the list of community aspirations (see above).
SLT Objective 3		Is the reference to 'teens' and 'elderly' appropriate? Is there evidence that these groups are particularly in need of facilities and opportunities? Have these groups been consulted? What about other groups such as disabled people, young Mums etc	Amend to refer to 'younger and older people' . Local knowledge and expressed views support these as priority needs.
SLT Objectives 4 and 5		Reference to facilities should reflect the SH OSSR and Playing Pitch Strategy (PPS).	The plan will reflect SHDC's PPS. The PPS should also seek to reflect the neighbourhood plan.
SLT Objective 5	South Hams District Council	Explain what is meant by dual use of school pitches and which facilities are referred to and provide evidence to support this. Should the objective refer to exploring opportunities to increase dual use? Consider adding reference to the school's policy, aspirations and plans.	The term 'dual use' is well understood. This objective is supported by DCC. It aims to do more than just explore opportunities. Reference to the school's future plans will be added.
SLT Objective 6		Add an adjective to this adjective, such as 'Support any	Add the words 'Promote more' to the start of

		proposal for visitor accommodation ...'	the objective.
SLT Objective 7		Clarify which cycle routes this refers to and consider promoting links to railway. Cycle routes do not feature on the 'Transportation' map (page 20). Consider adding an objective specific to the National Cycle Network.	The objective relates to all cycle routes. Add cycle routes to the Transportation map. Add reference to the NCN.
Employment Objectives		Emphasis on marketing and IT could narrow employment opportunities and the objective lacks explanation to support why these particular areas are desired. Provide evidence to show that such jobs could be achieved, would meet the local skills profile and be right for Ivybridge.	This locally set objective reflects the town's aspiration to grow as an investment, visitor and shopping choice, and to foster sustainable lifestyles.
		It is unrealistic and undesirable to seek that all new housing sites include employment and office space. There is no consideration of the size of site, characteristics or viability. Evidence is lacking.	This objective reflects the mixed use objectives of the adopted development plan. Reference to site size will be added.
Shopping and the Town Centre Objectives		Define the town centre area and clarify if this refers to enhancements in the public realm or includes other areas? A definition of the town centre based on the Site Proposals map (page 16) is not compliant with the NPPF (para.23 refers to the definition of 'the extent town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres'). Neither does it comply with saved policy SHDC23 of the 1996 adopted local plan. There appears to be no justification to include the area to the north which includes Stowford Mill.	The plan shows the area within which policy INP1 applies. The objective as set by the community does not specify public realm only. It is unclear why SHDC considers this not to be compliant with the NPPF. The inclusion of the area to the north is the community's wish, but this will be carefully re-examined.
Shopping and the Town	South Hams District Council	Perhaps 'create opportunities' would better reflect the objective to increase evening trade (restaurants etc)	This is helpful and the plan will be amended accordingly.

Centre Objectives			Glanvilles Mill is in private ownership and it would be more realistic and achievable to use the word 'support 'proposals to redevelop'.	This is helpful and the plan will be amended accordingly.
			The reference to the holistic redevelopment of Butterpark and Sportsmans Inn sites is not taken forward in the NP policies so this objective cannot be delivered.	This is helpful and the plan will be amended.
Community Objectives			The reference to public art is vague, raises issues of viability and cannot take precedence over SHDC's agreed approach to seeking contributions . Amend to 'promoting 'public art and 'encouraging' its inclusion in developments or "support community initiatives to promote public art".	This is helpful and will help to shape the new objectives.
Environment Objectives			These objectives are supported. Clarify that they aim to protect and enhance the natural and built environment.	This is helpful and the plan will be amended accordingly.
			The evidence base does not include reference to ecology and heritage to support elements of this objective.	Add appropriate evidence.
			The Devon Landscape Policy Group guide for neighbourhood plans includes the use of Landscape Character Assessments in NP's.	This is not a priority issue for the plan. The SHDC LCA will be sufficient.
Environment Objectives bullet point 1			Does this refer only to the open spaces shown in the 'Historic and Natural Environment' map? Some open spaces shown on the map conflict with proposal I1 in the Site Allocations DPD (Feb 2011) or with future development or infrastructure such as the link road. The NPPF seeks to 'conserve and enhance' the natural and built environment and the NP should reflect this.	The link to the map will be made clearer. Potential conflicts with needed development and infrastructure will be removed. The objectives are considered to reflect NPPF guidance.
Environment Objectives		South Hams		To add weight refer to biodiversity in general. If there is a particular reason to refer specifically to woodland

bullet point 2	District Council		biodiversity provide reasoned justification.	biodiversity.
Environment Objectives bullet point 3			It may be unrealistic to have an objective to ‘reduce’ pollution.	Amend wording to say ‘Support measures to help reduce pollution’.
Environment Objectives bullet point 4			Further clarification of the objective to ‘protect and invest in the Ivybridge Conservation Area would be helpful. What would investment be used to achieve?	The objective is generic. Overly specific detail would limit it unnecessarily.
Environment Objectives bullet point 5			Reflect NPPF and refer to ‘conserve and enhance’ historic features and natural resources.	Amend wording to reflect NPPF.
Environment Objectives			Opportunities should be considered to recreate habitats and establish linkages between distinct areas of habitat in the town centre and other areas with the INP area.	Consider ways to increase biodiversity and promote green infrastructure.
			There would be merit in referring to green infrastructure. The South Hams Green Infrastructure Framework has themes covering: <ul style="list-style-type: none"> ● Access, Health and Recreation ● Biodiversity, Landscape and Heritage ● Sustainable drainage, flood alleviation and water quality, and ● Local food and fuel. 	Add reference to the role of green infrastructure in NP objectives.
General			SHDC raises the need to be able to monitor the effectiveness not only of the policies but also the objectives of the plan.	A monitoring framework will be prepared, related to the plan's objectives and policies, to enable its effectiveness to be monitored.
Vision and Objectives	Environment Agency		Improving the town’s relationship with and enhancing the River Erme are central to many of the objectives set out in	Agreed.

			<p>the plan.</p> <p>Welcome the Environment objectives in respect of green space, biodiversity and reducing pollution in the River Erme. However, we also recommend the inclusion of an objective relating to reducing the risks or consequences of flooding.</p> <p>We would also recommend that the river corridor should be made as natural as possible and would be happy to discuss any opportunities for environmental enhancement along the River Erme Corridor.</p> <p>With regard to the objectives of the Water Framework Directive the River Erme through Ivybridge is at Moderate Ecological Status. It is failing with regard to barriers to fish movements (e.g. weirs and other obstructions). The target is to meet Good Ecological Status by 2027. Therefore, any new developments must not cause deterioration and the Plan should seek opportunities for improvements.</p>	<p>This will be a good and sound addition to the plan.</p> <p>Agreed, and a meeting will be arranged to explore this further.</p> <p>The monitoring framework will include reference to this target and the plan will be amended to state that new developments should not damage but enhance the Ecological Status of the river.</p>
General	Northern, Eastern and Western Devon Clinical Commissioning Group		<p>Recently published four commissioning strategies which apply to health and care services. These embrace the vision set out in the draft NP to build a town that promotes a healthy, creative and sustainable lifestyle. The plan's objectives also echo our vision of healthy people living healthy lives in healthy communities.</p>	<p>The CCG's strategies' alignment with the plan is noted and welcomed. Shared vision and objectives will assist partnership working.</p>
Vision and Objectives	Gladman		<p>The plan's vision is limited, insufficiently growth oriented, and its objectives will consequently be undeliverable.</p>	<p>The plan's vision is that of the local community. It responds strongly and appropriately to the town's recent history and anticipated future growth. Indeed, it is precisely that growth to which the plan is geared. No change.</p>

Section 4: Policies and Proposals				
Paragraph 4.1	South Hams District Council		Clarify that the Plan neither deals with nor aims to constrain current or future housing allocations.	Clarify this point in the plan.
Paragraph 4.2			Does the second sentence refer to outside the town's administrative boundary or outside the plan area? A neighbourhood plan can only make proposals within its plan area but can contain policies seeking contributions from future development to support needed facilities and infrastructure.	Clarify that this means facilities and infrastructure outside both the town and plan area but directly linked to meeting the needs of Ivybridge.
Paragraph 4.4 – bullet point 1			The Council is supportive of the aim to redevelop the land east of the River Erme so long as proposals support and are not in conflict with the Ivybridge Site Allocation DPD (Feb 2011) and the current Health and Wellbeing Partnership proposals for the area, both of which include residential development.	The NP neither proposes nor precludes residential development in this area.
Paragraph 4.4 – bullet point 2			Glanville's Mill is in private ownership. This reflects the community's aspiration to improve its appearance.	The plan aims to improve the area's "shopping offer, pedestrian facilities, appearance and success".
Paragraph 4.4 – bullet point 4			Any new bridges to promote movement around the River Erme should be well linked, safe and accessible for all.	Add reference to accessibility.
Para 4.4	Hannick Homes		Para 4.4 of the plan refers to a proposed new medical centre on land to the east of the River Erme. A planning application submitted by our client on land to the east of the town which forms part of adopted DPD Proposal I1, and which is currently being considered by South Hams District Council, includes a site for a new medical centre. The Plan should acknowledge this proposal as a significant	The need for a new medical centre in Ivybridge is not in dispute and discussions are continuing regarding its location. Progress with the application relating to DPD proposal I1 will be monitored and the plan will refer to the latest situation at the time of publication.

			community facility serving the town and hinterland. Suggested change: Add a reference in Section 4 to the medical centre proposal as part of the I1 allocation.	
Paragraph 4.5	South Hams District Council		The definition of the town centre and reference to the growing retail footprint could undermine the viability of the retail shopping area currently focused on Fore Street, Glanville's Mill and east of the river. Is it intended that the words "limit retail developments elsewhere" should preclude small scale neighbourhood shops in new developments?	Amend plan to more clearly define the town centre shopping area. Clarify what is meant by limiting retail development elsewhere.
Paragraph 4.6			Define what is meant by 'all kinds of development'. Does it meet CIL tests and S106 of The Town and Country Planning Act 1990. A further initiative for Ivybridge could be building an identity for the town (a brand) and developing the opportunities Ivybridge has for attracting more visitors and potential employers.	Make any amendments needed to ensure CIL compliance. The plan aims to raise the town's profile by building its identity in line with the vision. Scope to further promote this through a 'brand' will be considered.
Policy INP1: Town Centre Regeneration	South Hams District Council		<ol style="list-style-type: none"> 1. This policy is critical to supporting the aims of the NP and should be clear and direct. SHDC considers that it could be strengthened and more proactive but questions whether the reversal of traffic flow is strictly a planning issue. 2. The Site Proposals Map should be referred to in policy. 3. Consider revising town centre area to that shown in the adopted local plan. 4. SHDC has concerns about the requirement that 	<p>Amend text to strengthen the policy (to say more than encourage and support).</p> <p>Refer to Proposals Map in policy.</p> <p>The extent of the town centre area will be considered carefully.</p> <p>The plan aims to prioritise town centre</p>

		<p>'all' new development should make a contribution. The phrase 'new development' needs refining. The LPA also questions whether clause INP d) would be better included in Policy INP5: Community Facilities.</p> <p>5. Given that developing various brownfield sites are referred to in 'Shopping and the Town Centre Objectives' and this is a planning issue, should this not follow through as a proposal?</p> <p>6. Consider adding a bullet point to INP1 d) for improved provision of open space, sports and recreation facilities</p> <p>7. Link Policy to Site Proposals Map</p> <p>POINTS RAISED AT A MEETING ON 7th APRIL 2016</p> <p>8. No need to refer to changes of use since these are also a form of development.</p> <p>9. Consider adding a further item to the list to cover any other necessary infrastructure of facilities that might be reasonably required to support the development.</p>	<p>regeneration and accordingly seeks contributions from new development across the plan area. This will be clarified.</p> <p>This aspiration is captured in this and following policies, but will be made more explicit.</p> <p>Open space, sport and recreation is better dealt with in the relevant policy.</p> <p>Link will be made clear.</p> <p>Agreed. Delete "and changes of use".</p> <p>Agreed in principle. Add wording so that the policy will say "New development in Ivybridge should, in addition to the provision of requirements necessary to support the development itself, contribute to initiatives which support the town centre's regeneration. These might include".</p>
<p>Policy INP2:Town Centre land east of the River Erme</p>	<p>South Hams District Council</p>	<p>The policy could be strengthened by alternative wording such as:</p> <ul style="list-style-type: none"> • <i>The area is proposed for mixed use redevelopment to include:</i> <ul style="list-style-type: none"> ○ <i>a health and leisure hub</i> • <i>a hotel and restaurant</i> 	<p>Amend wording to provide more effective and clearer policy.</p> <p>Add the word capacity to no car parking loss.</p>

		<ul style="list-style-type: none"> ○ <i>retail and office development and so on.</i> <p><i>Development will be required to provide for:</i></p> <ul style="list-style-type: none"> ● <i>high quality design solutions</i> ● <i>a safe and attractive environment etc</i> ● <i>improved access etc</i> ● <i>and no loss of car parking <u>capacity</u>.</i> <p>The policy is not consistent with the adopted development plan and the current 'Health and Wellbeing Partnership' proposals for the area as it does not provide for any residential and the Draft INP does not propose any development to enable delivery of the overall proposal.</p> <p>It would also be helpful to include a requirement for a masterplan for the area to ensure delivery of a viable and comprehensive scheme.</p>	<p>Consider how any such scheme would be funded so the policy requirements are deliverable and achievable.</p> <p>The policy neither proposes nor precludes housing development.</p> <p>Amend to include a requirement for a masterplan.</p>
Policy INP3: Glanville's Mill Site	South Hams District Council	<p>This policy could be strengthened by alternative wording such as;</p> <ul style="list-style-type: none"> ● <i>Redevelopment and enhancement of Glanville's Mill is proposed for the following mixed uses:</i> ● <i>Development will be required to provide for (list as shown in the draft NP)</i> <p>Clarify what is meant by 'an improved shopping experience' and 'predominantly' retail use. Define primary shopping frontages.</p> <p>The inclusion of a specified residential element should be considered in order to assist overall viability and deliverability.</p> <p>Evidence should be provide to indicate that the site should be redeveloped rather than improved or clarity given about the development options for the site.</p>	<p>Amend policy and supporting text accordingly.</p> <p>The policy will be sharpened and simplified to enhance its meaning and clarity.</p> <p>The policy allows for and does not unduly constrain residential development on the site.</p> <p>The policy allows for the site's redevelopment but, should this not take place, also its enhancement.</p>

			<p>The potential impact of new bridges over the River Erme may have implications on the SSSI downstream. Bridge sites should be identified in order to assess this potential impact. Although the LPA supports the community wish to enhance this area no evidence has been supplied to justify a new river crossing in terms of the benefits that will be derived, as against the potential impact on the SSI and the viability of the policy.</p>	<p>To specify bridge crossing points in the plan would unnecessarily constrain possible redevelopment options.</p>
<p>INP1 – Town Centre Regeneration, INP2 – Town Centre land east of the River Erme, and INP3– Glanville's Mill site</p>	<p>Environment Agency</p>		<p>Welcome the commitment to creating a better relationship between the town centre and the River Erme and improving access to the river.</p> <p>However, our Flood Map indicates that some land within the boundaries of these policies is at risk of flooding from the River Erme. We recommend that they include a commitment to improving the resistance and resilience of development in these areas and to pursuing any opportunities that might arise from redevelopment to reduce flood risk overall (e.g. by making space for flood water and naturalising the river corridor).</p>	<p>Support welcomed.</p> <p>The policy will be amended in this respect.</p>
<p>INP1 – Town Centre Regeneration, INP2 – Town Centre land east of the River Erme, and INP3– Glanville's Mill site</p>	<p>Gladman</p>		<p>Support planning for town centre regeneration. However there is no evidence to show that the planning obligations or financial contributions sought comply with paragraphs 173 and 204 of the Framework.</p> <p>The plan as a whole is not sufficiently growth orientated to secure the necessary financial contributions required to the deliver the plan and its objectives. The plan should allocate additional housing land .</p>	<p>It is considered that the policy requirements are appropriate and compliant. No change.</p> <p>The town's future growth is already addressed in the adopted DPD. This plan addresses town centre regeneration as a priority and aims to harness the benefits of planned growth for the town's good.</p>

Policy INP4: North of Fore Street	South Hams District Council		<ol style="list-style-type: none"> 1. This policy could be strengthened by alternative wording such as <i>Redevelopment and enhancement of the area to the northern side of Fore Street is proposed to include (as clause a). The Development will be required to deliver high quality design and safe and convenient access for all.</i> 2. Explain in supporting text what qualitative assessment has been undertaken to justify policy. 3. Clarify what is meant by ‘high design standard?’, how much and what type of residential, and whether it will be a net gain? 4. Need to provide details of what parking requirements are associated with redevelopment? 	<p>Amend policy and supporting text accordingly.</p> <p>Add explanation in supporting text.</p> <p>High design standard is self-explanatory. Housing numbers do not need to be specified.</p> <p>Normal adopted parking standards would apply.</p>
What will be the main changes in the town centre?	South Hams District Council		The LPA understands that these boxes are extracted from a consultation document but in this instance it is important to be clear that it is envisaged that traffic flow would be from west to east.	Amend wording for clarity.
Paragraph 4.17 Traffic and Movement	South Hams District Council		The last sentence of this paragraph could be clearer and should refer to traffic leaving the A38.	Amend wording.
Paragraph 4.19	South Hams District Council		<p>Bullet point 1 - suggest reads as follows: a preferred design for an improved junction with the A38</p> <p>Bullet point 3 - suggest reads as follows: the best location for any future junction on the A38 to serve the eastern side of the town.</p>	Amend wording.
Para 4.20	South Hams		Suggest omitting the word ‘but’ at the beginning of the	Amend wording.

	District Council		third sentence to improve the meaning.	
Para 4.21	South Hams District Council		For clarity suggest amending last phrase to read as follows: Development should also contribute towards raising public awareness and enjoyment of these features. Consider how this can be done and check that this is followed through in policy.	Amend wording and consider policy implications.
Para 4.20 and 4.21	Environment Agency		With regard to the 'Town as a whole' policies we welcome the recognition in the supporting text that the River Erme is 'the town's principle natural asset' (paragraph 4.20) and the aim of the plan to conserve and enhance 'open spaces, woodlands and watercourses' (paragraph 4.21).	Support welcomed.
Policy INP5: Community Facilities	South Hams District Council		<ol style="list-style-type: none"> 1. The policy wording could be stronger and more direct than saying 'may include' 2. Some of the policy requirements are vague and questionable in terms of seeking contributions, for example the creative arts and increased dual use of school facilities. 3. It may be unreasonable to expect 'all' new development to contribute. The policy may not be CIL compliant. 4. Consider including neighbourhood shops in the list of facilities to bring forward an objective of the NP. 5. The list of community facilities in the policy appears not to be evidence based and is likely to compete with SHDC's priorities for contributions. 6. The need for improvements to playing pitches is identified in the South Hams and West Devon 	<p>Consider issues raised and amend policy wording for added clarity.</p> <p>The policy will make it clear that it should be applied in accord with the adopted standards set in other policies which may be in force.</p> <p>It is necessary that a shop be viable in its own right and it is not considered appropriate to add it to the list shown in the policy.</p> <p>The list shown in the policy is based on local community aspirations.</p> <p>Noted. This supports its inclusion in the list shown.</p>

			<p>Playing Pitch Strategy 2015.</p> <p>7. This policy may also wish to refer to improvements to parks, accessible natural spaces and allotments.</p> <p>8. Extend clause g to cover multi – user routes rather than just cycling routes.</p>	<p>These were not identified as priority aspirations by the local community.</p>
Policy INP5 – Community Facilities	Devon County Council		<p>Support promoting the library as a key place for learning and community groups in addition to improved youth provision within the town and can provide advice and guidance on these matters.</p> <p>Support increased dual use of school facilities and are currently working with the community to secure funding for additional all weather training pitches which, it is envisaged, will be dual use.</p>	<p>Support welcomed and advice and guidance will continue to be sought.</p> <p>Support and dual use of all weather training pitches welcomed.</p>
Policy INP5 – Community Facilities	Gladman		<p>Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.</p> <p>The policy should be tested for its effects on development viability. Contributions must be based on up-to-date, robust evidence of needs and cannot be used to make up the funding for desirable infrastructure, or to support the provision of unrelated items.</p>	<p>It is understood that these tests should be met. The policy helpfully sets out the community's aspirations for new and improved community infrastructure. There is no expectation that these can be delivered at the expense of development viability, but their identification enables better planning by all concerned. No change.</p>
Policy INP6: Housing & Employment	South Hams District Council		<p>Clause a)</p> <p>1. Following the successful legal challenge against the Government’s higher affordable housing thresholds, SHDC has reverted back to its previous policy position regarding AH thresholds (as per</p>	<p>Ensure policy aligns with the latest adopted development plan policies in force.</p>

		<p>policy AH DPD Policy AH3).</p> <ol style="list-style-type: none"> 2. Consider strengthening the policy along the lines of bringing forward development on a mixed use basis, including employment. 3. Clarify in supporting text what is meant by employment. 4. Consider the impact on viability of a contribution towards employment on development of 2 or more dwellings. 5. Clarify if a certain % of lifetime homes is sought by the proposal. 6. Provide evidence to support the various aspects of this policy to ensure it is achievable and deliverable. 7. Provide supporting text to demonstrate how financial contributions will be calculated. 8. Any requirement for a travel plan and assessments must be consistent with the thresholds applied by the Highways Authority. <p>Clause b)</p> <ol style="list-style-type: none"> 9. Meeting adopted housing standards is secured by building regulations and should not be included in policy. Development cannot be required to surpass these standards and the current policy wording is unenforceable. <p>POINTS RAISED AT A MEETING ON 7th APRIL 2016</p> <ol style="list-style-type: none"> 7. What does this policy aim to add? Is 10 dwellings 	<p>Amend policy accordingly.</p> <p>This is self-explanatory.</p> <p>The plan does not require this.</p> <p>The plan requires that adopted development plan policy requirements continue to be met.</p> <p>The plan relies on the evidence and guidance on contributions which already supports the adopted and emerging development plans.</p> <p>Agreed.</p> <p>The policy does not require that developments must exceed adopted standards but encourages that they aspire to do so.</p> <p>Ensure policy aligns with the latest adopted development plan policies in force.</p>
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			the right threshold for all policy elements?	
INP6 – Housing and Employment	Gladman		<p>To require that development should at least meet and exceed the latest government housing standards should be removed from the INP. The Deregulation Act 2015 obtained Royal Assent on 30th March 2015. The written statement to parliament (dated 27th March 2015) makes clear that qualifying bodies preparing Neighbourhood Plans that the optional new national technical standards should only be undertaken through new Local Plan policies based on a clear up-to-date assessment of need. Neighbourhood Plans should not be used to apply the new national technical standards.</p> <p>Any reference to housing technical standards should be deleted from the INP. If this requirement is progressed it will be found inconsistent with basic conditions (a), (d) and (e) and may subject the INP to judicial review proceedings.</p>	Gladman has misread the plan. It does not require that current standards necessarily be exceeded, rather it sets out a requirement that they be at least met and and, in line with local aspirations and objectives, that all should strive to do even better. This is a simple invitation to progress. No change.
Policy INP6: Housing & Employment	PL21		<p>Advocate several requirements which should be applied to all new developments, including:</p> <ul style="list-style-type: none"> • high environmental standards • sustainable urban drainage systems (SUDS) • amenity open space • native planting • an appropriate range and mix of housing • a preferential local occupancy test. <p>Advocate accessibility for the less able bodies and child inclusiveness, and improved provision of litter and dog poo bins.</p> <p>Advocate enabling people to work from home by</p>	<p>The plan principally aims to address transport management and town centre regeneration. It cannot place an undue burden on development, but seeks to provide for generally good standards of design and sustainability in new development.</p> <p>Amend Policy INP6 to add clarity and certainty. Suggestions such as a preferential local occupancy test would require re-consultation.</p> <p>Plan policies generally seek to secure</p>

			providing great internet connections, right size properties and employment units within housing developments.	accessibility, inclusion, mixed uses, home working and local employment.
Policy INP7:Traffic and Movement	South Hams District Council		<p>Clause a)</p> <ul style="list-style-type: none"> SHDC questions whether this warrants inclusion as a policy. It also appears to predetermine the findings of any future study. <p>Clause b)</p> <ul style="list-style-type: none"> Evidence is needed to support this. There is no such requirement in the Ivybridge DPD (Feb 2011) so it is unlikely that this could be implemented. There is no evidence to support the requirements for design and delivery before 2021 or ahead of 50% of allocated developments. <p>Clause c)</p> <ul style="list-style-type: none"> The details of any contribution should be clarified. SHDC assumes that this does not include the sites already allocated, particularly as requirements cannot be required retrospectively and at this stage the study has not been undertaken. 	<p>This policy responds to a priority concern expressed by the local community. It does not seek to predetermine findings but to ensure that possible solutions put forward over the years are not overlooked. The policy will be redrafted to be more consistent with others in the plan.</p> <p>The timescale and threshold may be unduly ambitious, but they set targets to aim for. These targets will be carefully considered.</p> <p>Although the plan cannot, of course, be applied retrospectively, it can apply to allocated sites which have yet to receive planning permission.</p>
Transportation Map	South Hams District Council		<ol style="list-style-type: none"> The transportation map identifies proposals outside of the neighbourhood plan area, and as such are undeliverable through the INP. The status of these proposals should be clarified, especially the routes identified to the south of the A38. There appears not to be any cross referencing to text in the INP to support the map. The status of the map needs clarification – is it for 	<p>The Transportation Map is for information and not part of the Proposals Map. Amend plan to make this clear.</p> <p>Possible transport solutions outside the plan area are shown for information only.</p> <p>Cross references will be added.</p>

			<p>information or does it show any proposals?</p> <p>4. There is no evidence to show how any proposals can be brought forward, for example funding and delivery prospects.</p> <p>5. The key needs further clarification e.g. National Routes – does this mean NCN National Routes (National Cycle Routes)?</p>	<p>There is a dearth of hard evidence (although plenty of local knowledge of the issues) – hence the need for a study.</p> <p>The key will be made clearer.</p>
INP7 – Traffic and Movement	Highways England		<p>Note that the plan seeks to commission a study to recommend traffic measures to address improved access to and junctions with the A38. Reiterate their view that current levels of proposed growth would not support extensive junction improvements and that any such would, in any case, not be easily deliverable (if at all), and that Ivybridge is not a priority site for improvements on the strategic road network.</p>	<p>This view is understood. However, the plan seeks to enable a detailed assessment of what will be the best way to address existing and future traffic difficulties, bearing in mind that further growth may well be proposed for the town.</p>
INP7 – Traffic and Movement	Devon County Council		<p>Devon County Council has concerns about the transport solutions suggested in the Plan, including improved junction arrangements at the A38, provision of a major new junction onto the A38 and a new link road to the south of the town. The County Council maintains that this infrastructure is unaffordable and undeliverable.</p> <p>As of 2015 the County Council must seek funding for major infrastructure through the Growth Deal process, which is managed by the Local Enterprise Partnership. This offers little scope to secure external funding to deliver major transport schemes.</p> <p>The road system to be delivered as part of the proposed growth to the east of the town will provide some relief on Exeter Road and enable improved walking and cycling</p>	<p>Following a meeting further clarification is awaited from the County Council. The plan does not specifically propose such measures, but rather that a study be carried out to ascertain what measures will be appropriate (and affordable and deliverable) in order to address the town's growing traffic difficulties, and that such measures be considered.</p> <p>Changes to the plan to include such minor measures will be acceptable providing they do not dilute the plan's focus on securing significant change for the better.</p>

		<p>links through the town. Where walking and cycling plans are developed by the community, with match funding secured and land assembled, there may be scope for some limited LTP funds to be allocated to support their delivery. There are also potential small scale, traffic management measures that can be investigated to improve air quality on Western Road.</p> <p>DCC's supplementary comments</p> <p>Clause a) proposes a traffic study to resolve current traffic issues identified by the community, whose consideration is valid. Clauses (b) & (c) go on to indicate that allocated development within the 2011 DPD should be required to fund both a study and also any transport improvements identified by the study.</p> <p>Where necessary Traffic Assessments (or traffic studies) are always required for significant new developments. Requesting funding from developments to undertake a separate traffic study is really questioning the validity of these assessments. For improvements to be funded and delivered by new developments then then these improvements should be reflected by the TA or in the DCC response to the TA.</p> <p>If the policy objective is for a traffic study to consider what measures might be appropriate or beneficial for the town then, while this is a valid local objective, it may well be beyond the scope of being funded and delivered by new developments. A policy commitment to deliver by 2021 or 50% DPD is not realistic if it is intended to consider or address any of the three stated policy issues.</p> <p>Should significant new development around the town be</p>	<p>Clause c) in fact requires any new development to contribute, not just that proposed in the 2011 DPD.</p> <p>It is considered that there is a need for a holistic study of the town's existing and future traffic issues, particularly in view of the likelihood that the new local plan will require further new development in the town.</p> <p>It is accepted that the 2011 DPD allocations alone could not reasonably be required to fund the study and any recommended measures.</p> <p>It is understood that a study is largely dependent on the new local plan and the policy has been written with this in mind. The plan will be amended to make this clearer.</p>
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			identified in the emerging Local Plan then DCC may need to consider the traffic impact and benefits of these kinds of measures. But without significant new allocated development being considered then DCC would not be in a position help fund a new study.	
INP7 – Traffic and Movement	PL21		Support safe cycling and walking, including shared space, and town centre cycle racks. Also advocate an electric car charging point.	Policy INP7 addresses this in general terms. Reference to safety and cycle storage will be added.
Policies INP5 – Community Facilities, INP6 – Housing and Employment and INP7 – Traffic and Movement	Hannick Homes		<p>Policy CS8 (Infrastructure Provision) of the Core Strategy sets out a requirement for necessary infrastructure to be in place or provided in phase with development. It also seeks financial contributions towards such provision, where appropriate. As the Neighbourhood Plan is required to be read alongside the Development Plan the references in INP5 - INP7 to contributions are unnecessary.</p> <p>The wording of the policies also conflicts with the Community Infrastructure Levy (CIL) provisions. South Hams District Council will, in due course, adopt CIL rates for the district, dealing with wider, non site specific infrastructure. It will still be possible for requirements specific to a proposed development to be dealt with under S106. The policies of the Plan, however, suggest that s.106 agreements will be used to secure off-site benefits and this ignores CIL.</p> <p>Suggested change: Delete the references to contributions from Policies INP5 - INP7. Add explanatory text setting out the arrangements which apply as a result of CIL and clarifying the relationship between CIL and site specific</p>	<p>In view of Ivybridge's historic infrastructure deficits it is considered important to make every effort to ensure that necessary support infrastructure is provided for as part of new developments. It is helpful for the plan to include these requirements which are not in conflict with the strategic policies of the development plan.</p> <p>Furthermore, until such time as SHDC has put CIL in place it is considered appropriate and helpful for the policies of the plan to reinforce the need for new developments to provide for infrastructure.</p> <p>It is, however, accepted that the plan could add reference to the prospect of CIL in future, and this will be done.</p>

			s.106 agreements.	
Policy INP8: Historic and Natural Environment	South Hams District Council		<ul style="list-style-type: none"> The open space policy needs to be cross referenced to the Historic and Natural Environment proposals maps. <p>Clause a)</p> <ul style="list-style-type: none"> Further definition is needed of what the town's important and locally significant historic features and natural environmental assets are. Clarification about how new development will respect, complement, conserve and enhance would strengthen this policy. <p>Clause b)</p> <ul style="list-style-type: none"> The open space proposals must be consistent with the Ivybridge DPD (Feb 2011). A parcel of land to the west of the rugby club which is part of the I1 allocation is identified in the Draft INP as open space and is therefore protected from development. Assuming that the policy applies to the open spaces identified on the map, the two largest areas shown lie outside the NP designated area and therefore the policy cannot apply to them. Evidence should be provided to justify designation of these areas. <p>Clause c)</p> <ul style="list-style-type: none"> Does this refer to the important woodland identified on the map but these lie outside the NP area? 	<p>Cross references will be added, although it should be noted that the map is for information only.</p> <p>The plan will be expanded to refer to these in more detail.</p> <p>Further detail is not needed and would be likely to fetter good design.</p> <p>Amend plan accordingly.</p> <p>The map is for information only. Policy cannot apply outside the plan area but the areas are shown because of their significance to the town.</p> <p>The policy cannot apply outside the plan area.</p>

			<ul style="list-style-type: none"> • The question is raised about how to assess and secure the management of this through the policy and the policy needs to be clear about what type of management would promote biodiversity. This point may be combined with open spaces which can also provide value for biodiversity. • Suggest revised wording for INP8 b) and c): Woodlands and open spaces will be kept free from development other than that which is directly associated with their management, maintenance and enhancement. Management of such areas will promote biodiversity’. <p>Clause d)</p> <ul style="list-style-type: none"> • Further clarification is needed to identify how the River Erme and other watercourses will be protected, for example is this through benefits accrued through development? 	<p>The plan will be amended accordingly.</p> <p>The policy will be amended to require that new developments should not damage but enhance the Erme's ecological status, as suggested by the Environment Agency.</p>
Policy INP8 – Historic and Natural Environment	Natural England		<p>Natural England's 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>We welcome policy that will ensure “new developments will respect, complement, conserve and enhance...natural environmental assets and their enjoyment by the public.”, “woodlands will be protected from development and their management will promote biodiversity.”, and “water quality in the River Erme and other watercourses will be protected, and where necessary or possible, enhanced.”</p>	Support welcomed.

			These measures accord with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'</i> . Section 40(3) of the same Act also states that <i>'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'</i> .	
Policy INP8 – Historic and Natural Environment	Environment Agency		Welcome commitments to protect and enhance water quality in the River Erme and other watercourses as well as to keep open spaces free from development. The latter will be important in areas adjacent to the River Erme especially with regard to making space for flood waters. We recommend the policy or supporting text refers to this benefit that open space can provide. We would also welcome a commitment to, wherever possible, increasing provision of open space particularly adjacent to watercourses.	Support welcomed. The plan will be amended accordingly.
Policy INP8 – Historic and Natural Environment	Gladman		New development can often enhance existing green infrastructure, where necessary, through good quality design. This policy will need to ensure sufficient flexibility i.e. for access to ensure the delivery of a wider scheme and the benefits associated to its development.	Noted. No change necessary.
Strategic Environmental Assessment / Sustainability Appraisal				
Strategic Environmental Assessment /	Gladman		The local planning authority, as part of its duty to advise and assist, should put in place processes to determine whether the proposed neighbourhood plan will require an	A screening opinion has been sought from the LPA. The current report and appraisal are at draft

Sustainability Appraisal			SEA, this has not been carried out. The Scoping Report and Sustainability Appraisal has not been undertaken in accordance with the requirements.	stage and will be developed further, including necessary consultations.
Monitoring				
Monitoring	Various		Several comments, particularly from SHDC, refer to the need to monitor the plan's effectiveness.	Develop a simple monitoring framework for the plan.