

Please reply to: Alan Stora
Service: Place Making
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6 May 2016

Dear George,

South Hams District Council (SHDC) response to the draft Ugborough Neighbourhood Plan

Thank you for sending the pre-submission Ugborough Neighbourhood Plan (Regulation 14)* to the Local Planning Authority (LPA) for comments. This will be referred to as the Draft Ugborough Neighbourhood Plan (Draft UNP) in this document.

The LPA fully supports the initiative for the Neighbourhood Planning Group (NPG) to produce a Neighbourhood Plan (NP) and recognises that much work has gone into the development of the UNP with extensive community involvement. The LPA commends the Ugborough Neighbourhood Plan Group (UNPG) for all the hard work already put into the Plan.

These comments have been provided to assist the Neighbourhood Planning Group (NPG) in producing a Draft Neighbourhood Plan (Regulation 15)*. The response is based on the information provided and available at the time of reviewing the Plan, which includes the pre-submission draft Ugborough Neighbourhood Plan (February 2016) and other consultation documents.

The scope of a neighbourhood plan and area is a decision for the NPG and this will depend on a number of factors. These will 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 LPA notes the focus of the Draft UNP on the town centre and suggests that the UNP clarifies that by not either acknowledging the adopted local plan or engaging with future growth it does not intend to undermine these. 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.

The LPA has made a number of suggestions for further consideration prior to submission of a Draft Neighbourhood Plan to help ensure the Plan is successful at examination and contributes to a strong planning policy framework for Ugborough. The Plan has some sound aspirations in what it wishes to achieve for the community but lacks some detail in respect of how these desirable things will be achieved and the evidence to support them. Few development opportunities are identified in the Plan to enable these aspirations which are reflected in the Plan's objectives to be realised and delivered. While neighbourhood plans need to be aspirational they also need to be realistic and deliverable.

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The LPA response is organised into two parts. Part 1 considers the Draft UNP against the 'basic conditions' which the examiner will use to assess the Plan; whilst Part 2 provides a more detailed assessment. The main areas of comment are:

- The Plan and associated documents have been well prepared, and are thorough in part. In some cases the information provided far exceeds what is required to inform the policies within, although it is accepted that the overall document does provide a comprehensive understanding of the NP area.
- The Vision and Objectives need to be clearer – ideally bullet pointed for clarity. They also need to be reviewed to ensure that they are measurable.
- **The Housing policies in their current form do not meet the Basic Conditions. It is the view of SHDC that the housing figure and policies are not supported by sufficient evidence, and that this will need to be addressed before the Neighbourhood Plan can be considered for examination.**
- **There are concerns that the Affordable Housing policies are not deliverable, and are unlikely to result in the provision of any new affordable housing stock required to meet the identified need.**
- The various criteria relating to new housing development needs to be listed in one place, rather than scattered under a range of different topics.

The LPA would welcome the opportunity to discuss these comments and further assist with the Draft UNP if this would be helpful.

You will be aware from a recent email that Ross Kennerley that SHDC now have dedicated officers who can support your work on Neighbourhood Plans. Alan Storah will be providing additional specialist support to all Neighbourhood Plan Groups in the short term. He will therefore be taking over my responsibilities with regard to working with, and supporting, your group.

Alan has considered your draft plan and is in agreement with the formal response that I am providing, and we are both of the opinion that there are matters which must either resolved or, at least, fully explored before your NP progresses. That is because we consider that there need to be changes made before the plan can satisfy an examiner.

We consider that it would be helpful if Alan met with you to discuss the situation and explain his (or rather, our) concerns about the plan, and identify how SHDC can assist you in addressing the concerns raised. It is, however, important for the NP groups to be aware that that the council cannot, and does not intend to, tell them what to include in their plans.

Yours sincerely,

Phil Baker

Specialist, Place Making.