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## **REPORT TO PLYMOUTH CITY COUNCIL**

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**an Inspector appointed by the Secretary of State  
for Communities and Local Government**

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## **PLANNING AND COMPULSORY PURCHASE ACT 2004 (SECTION 20)**

## **REPORT OF THE EXAMINATION INTO THE NORTH PLYMSTOCK AREA ACTION PLAN (INCLUDING MINERALS) DEVELOPMENT PLAN DOCUMENT**

**Document Submitted for Examination on 22 August 2006**

**Examination Hearings Held on 13 February and 28 March 2007 at**

**The Council House, Royal Parade, Plymouth**

## **1. Introduction and Overall Conclusion**

- 1.1 The requirements of Section 20 (5) of the 2004 Act are:
- Whether the Development Plan Document (DPD) satisfies the requirements of Sections 19 and 24(1) of the Act;
  - Whether the DPD is sound.
- 1.2 This report contains my assessment of the Area Action Plan (AAP) in terms of the above matters, along with my recommendations and the reasons for them. In assessing soundness, I have had regard to all the matters raised in the representations to the AAP, and to the issues discussed at the Hearings including the Joint Session held with the Sherford AAP Examination on 13 February.
- 1.3 My report follows the AAP's order, and under each principal issue I consider and conclude on the issue against the Tests of Soundness as set out in paragraph 4.24 of PPS12. My recommendations to make the AAP sound are contained in the body of my report, and should be read in conjunction with a revised version of the AAP (Document NPS0013), which is Appendix 1. The latter reflects all the changes the Council needs to make as well as the minor consequential changes, layout improvements and editing of the submitted AAP that the Council wishes to make. Having considered all those latter changes, I am content to endorse them and recommend that they be made because they do not materially alter the substance of the AAP. Although they have not been subject to public consultation, I am satisfied that they can be made without prejudice to the statutory process the Council is required to follow in order to adopt the AAP.
- 1.4 My overall conclusion is that the AAP is founded on a solid evidence base, and it is sound provided the changes I recommend are made. With these changes, the AAP will provide a good framework for implementation to allow the City to achieve its Vision. None of the changes require that the AAP be subject to a further Sustainability Appraisal.

## **2. The Procedural Tests of Soundness**

### **In relation to Tests of Soundness I, II and III**

- 2.1 The AAP's production is identified in the Council's Local Development Scheme (LDS), which was adopted in July 2005. I am satisfied that the AAP has been prepared in accordance with the intended scope and the milestones in that document, and therefore the first Soundness Test has been met. The AAP has also been prepared in compliance with the Council's Statement of Community Involvement, which was adopted in July 2006. There is nothing to suggest that the Council has not fully complied with the consultation requirements of the 2004 Regulations. The second Soundness Test has therefore been met. Each stage of the AAP's preparation has had a sustainability appraisal, and the submitted Plan has been subject to a satisfactory Strategic Environmental Assessment. The third Test of Soundness has therefore been met.

### **3. The Conformity, Coherence, Consistency and Effectiveness Tests of Soundness**

#### **In Relation to Test of Soundness IV:**

- 3.1 Government guidance on what an AAP should include is contained in Planning Policy Statement (PPS) 12 – Local Development Frameworks and its Companion Guide. Essentially, an AAP should be a spatial plan that draws together the plans and programmes of all relevant bodies and authorities to provide the land use planning framework for areas where significant change or conservation is needed, with a key feature being the focus on implementation. AAPs should identify the distribution of uses and their inter-relationships, including site specific allocations, and set the timetable for the implementation of proposals.
- 3.2 Paragraph 2.1 of this AAP states that it is being produced because it is an area where there are significant development opportunities that the plan needs to guide and co-ordinate. The AAP is also needed because there are many different issues and owners involved so these need to be carefully balanced to ensure development is co-ordinated and complements existing urban areas. The AAP is needed to accommodate some of Plymouth's population and housing growth requirements, and the location of development relates to the significant brown field redevelopment opportunities, especially at Plymstock Quarry. The AAP will also accommodate the change arising from the Sherford new community, and the infrastructure requirements of that project.
- 3.3 The AAP is founded on a robust and credible evidence base, comprising a series of background studies, notably the Eastern Corridor Study. The AAP contains the vision to create high quality, locally distinctive and sustainable mixed-use neighbourhoods in North Plymstock. This is consistent with the Core Strategy's approach to building a high quality, sustainable City. The AAP Vision is elaborated in a set of objectives, and targets are set for the delivery of key components of change. The AAP then contains a series of proposals to promote and guide development and change across the plan area. These set down the expectation of development proposals with key criteria for the determination of planning applications.
- 3.4 There is however, some unnecessary duplication with the Core Strategy's Policies, for example some of the criteria in the AAP's Proposals repeat Core Strategy wording. The Council accepts this, and changes to the revised version of the AAP at Appendix 1 remove that duplication. I recommend these changes are made. As the Council has also recognised, there is a need to draw together the various Proposals and represent them on an OS base in the form of a Proposals Map. I recommend that this is done.
- 3.5 The AAP is focussed on delivery, particularly in relation to accommodating strategic housing need. I consider that it conforms to the detailed requirements of PPS3, summarised in paragraph 10. The implementation of the AAP's proposals will achieve high quality, well designed housing built to a high design and environmental standards; there will be a large supply and a good mix of open market and affordable dwellings; those dwellings will be built close to the existing urban area with good access by public transport and ready access to employment, community and shopping facilities; and the supply of residential land can be managed to make the most efficient use of the high proportion of previously developed land. In relation to the latter, it is notable that over 60% of the new housing planned will be on previously developed land.

- 3.6 Section 6 contains a Delivery Summary that sets down for each Proposal the body responsible for delivery, the mechanism, funding, delivery land issues, and phasing issues. However, I consider that the AAP should be changed to include in the Delivery Summary the implementation aspects of each Objective and Proposal. This will add clarity to the Plan and ensure soundness in this aspect. The AAP's final section describes the monitoring framework, and refers to the important role of the Council's Annual Monitoring Report (AMR) in measuring the extent of success in delivering the AAP's Proposals.
- 3.7 As for conformity with Regional Planning Guidance 10 (RPG10), the AAP's Proposals for significant housing development accord with the RPG's strategy of strengthening the role and status of the Plymouth Principal Urban Area (PUA), and accommodating the new community at Sherford. With regard to the draft Regional Spatial Strategy (RSS), there is no evidence to suggest other than the AAP's proposals fully conform to that document, especially in relation to the need to build sustainable communities linked by a high quality public transport network.
- 3.8 In summary, I am satisfied that the AAP is a spatial plan; it reflects national guidance on spatial plans, and is consistent with national planning policy, generally in relation to the content of such plans, and particularly with regard to the priority to be attached to achieving a step change in the supply of housing, built in a sustainable way. The AAP has regard to other plans and strategies, and in particular it is in conformity with RPG10 and the draft RSS.
- 3.9 In conclusion, Test of Soundness IV is met subject to the changes recommended below.

<b>R1</b>	<b>Include the Implementation sections of each Objective and Proposal in the Delivery Summary, in accordance with the wording in Appendix 1.</b>
<b>R2</b>	<b>Remove unnecessary duplication between the AAP and the Core Strategy, in accordance with the wording in Appendix 1.</b>
<b>R3</b>	<b>Include a consolidated Proposals Map.</b>

**In Relation to Test of Soundness V:**

- 3.10 There is no evidence to suggest that the AAP is anything other than consistent with, and will help achieve the aims of, the Council's Community Strategy ("Plymouth City Strategy and Action Plan"). This Test of Soundness is therefore met.

**In Relation to Test of Soundness VI:**

- 3.11 The AAP's proposals fit squarely with, and seek to implement, the principles of the adopted Core Strategy. The AAP amplifies Core Strategy Area Vision 8, which it takes precedence over, and contains the appropriate level of detail to provide the necessary guidance for the determination of planning applications. The cross border aspects of the AAP are clearly identified, reflecting close collaborative working with neighbouring authorities, especially South Hams District Council in respect of the implications of the Sherford new community. I am therefore content that, with changes to the Cross Border Vision Diagram and the wording of the requirement for affordable housing, as discussed below and as detailed in

Appendix 1, the AAP is coherent and consistent with the Core Strategy, the South Hams Core Strategy and the Sherford AAP. This Test of Soundness is therefore met.

### **In Relation to Test of Soundness VII:**

- 3.12 This Test of Soundness is concerned with ensuring that the AAP's Proposals represent the most appropriate in all the circumstances, having considered the relevant alternatives, and are founded on a robust and credible evidence base. Many of the representations on the AAP focus on this aspect. I have taken a selective approach to the examination of the AAP's Proposals, concentrating on those issues that raise questions about the plan's soundness. Under the Proposals listed below, I identify the most important issues that require my consideration, as follows:

#### **Proposal NP 01 – Plymstock Quarry**

- 3.13 Proposal NP 01 makes provision for the development of a sustainable new residential neighbourhood comprising in the region of 1,500 homes; 3.5 hectares of employment land; an extended primary school and a mixed use local centre. The Proposal contains over 60 detailed criteria, which reflect the sustainable development aspirations of the Core Strategy, to ensure a successful, predominantly residential neighbourhood is established. The Proposal is the latest manifestation of work that has been carried out since the late 1990's to achieve re-use of an extensive area of derelict land, formerly a quarry and cement works. The alternatives for the mix of uses of this site were considered at the Issues and Options stage of the plan making process. I note the public consultation that has taken place over the years, and the efforts made to ensure the current Proposal is sound. The Proposal has been modified in the light of comments made before the AAP was submitted for Examination. Consequently the issues that warrant examination now are limited, as follows.

#### **Issue A - Should a Higher Housing Target be Specified?**

- 3.14 The Proposal's first criterion states that "in the region of 1,500 homes" will be built. That figure is based on the Council's Urban Capacity Study but there is work being done to progress an outline planning application for the site that indicates that its capacity could be 1,650. For consistency with the important change made to Core Strategy Policy CS 15 with the addition of the words "at least" and to acknowledge that the City's growth agenda will not be restricted by the figures in the Proposal, I consider it is appropriate for NP 01 to clarify that a reasonably higher figure for Plymstock Quarry would be acceptable provided all relevant development control Policies are satisfied. I recommend that the Proposal and supporting text be changed as detailed below.

#### **Issue B -Whether the Proposal Should Include Wixenford Quarry?**

- 3.15 Wixenford Quarry lies to the north east of the main body of the proposed Plymstock Quarry residential area, and is separated from it by the Pomphlett Plantation. Wixenford Quarry has a floor area of approximately 3.5 hectares, and it shares many of the characteristics of Plymstock Quarry, being severely degraded land with steep exposed rock faces. However, this appearance will be improved by the Quarry Redevelopment Management Plan. If Wixenford was to be included with the scheme for Plymstock Quarry, it might accommodate around 100 dwellings. There are two issues that need to be considered. The first is the possible visual impact of residential development on the setting of Saltram House, and the second is whether such a development would be sufficiently well integrated with Plymstock Quarry so that the Core Strategy's aim of promoting sustainable linked communities is furthered.

- 3.16 With regard to the possible impact on Saltram House, there is no dispute that Wixenford Quarry is within its "essential setting". However, its derelict state and physical containment means that it contributes little, if anything, to the much higher quality parkland landscape to the north. Residential development has the potential to be more intrusive but much depends on how it is carried out. Having considered the Landscape and Visual Impact Assessment (NP 1946B Appendix 5) and as a result of my site inspection, I am satisfied that skilfully designed dwellings, carefully sited to avoid the more prominent parts of the site, and utilising existing and new planting could avoid any significant change to the setting of Saltram House. I accept that there might be some impact from the night time glow of development but seen against the backdrop of Plymouth City Centre, such an impact would not be new or much more harmful to Saltram.
- 3.17 Turning to the degree of integration, I am much less optimistic because I doubt whether residential development there would meet the requirements of Core Strategy Policy CS01. Wixenford is too discreetly located and too small to be visually or functionally part of the much larger Plymstock Quarry scheme. I accept that there is an opportunity for creative, sustainable building design. Nevertheless, served by just one winding road access from Colesdown Hill, residential development at Wixenford would be set down in a cul de sac with a northerly aspect. This is well illustrated in Figure 5 of the document referred to above. The limited number of dwellings able to be built there would appear isolated and poorly integrated with Plymstock Quarry. It would be difficult for such a form of development to encourage a positive sense of place and identity with good social cohesion and easy access to community facilities. Although footpath and cycle way links with Plymstock may be possible, such an isolated form of development is more likely to encourage greater car use, especially if bus operators find it less profitable to frequently penetrate a long residential cul de sac.
- 3.18 I have of course weighed in the balance the pressing need to make full and effective use of previously developed land, and Plymouth's aspiration to grow beyond the number of dwellings specified in Policy CS16. However it is equally as important that the quality of development is not compromised by including sites for housing that would not deliver the sustainable linked communities objective, as I believe would be the case if Wixenford Quarry is included in Proposal NP 01.
- 3.19 The AAP includes Wixenford in Proposal NP 11 – Countryside Park. Whilst the condition and topography of the Quarry presents difficult challenges to achieve successful integration with the remainder of the Park, I consider that recreational use, which would also capitalise on the nature conservation potential there, is the most appropriate use for Wixenford in all the circumstances. Accordingly, I conclude that Proposal NP 01 should not be changed to include Wixenford.

Issue C – Should the Proposal Encourage Progress to Zero Carbon Development?

- 3.20 The Council recognises that the AAP needs to be changed to reflect the latest Government guidance on how progress can be made to ultimately achieve zero carbon development. I acknowledge the transitional difficulties and costs of making such progress. Nevertheless, the Proposal should be clear in its intent to work towards this goal. Accordingly, I support the wording in Appendix 1 (criterion 47 of NP 01) which deals with this matter, subject to the further change I recommend below.

Issue D – Is the Requirement for Affordable Housing Appropriately Worded?

- 3.21 The requirement for affordable housing contained in this Proposal, and indeed other Proposals for primarily residential development, should reflect the changed wording that is now included in the adopted Core Strategy. It is important that the AAP is more consistent with other relevant Plans and Strategies, principally

the South Hams Core Strategy, the Sherford AAP and the draft RSS. This could be achieved by including the words "at least" before the number of affordable dwellings in NP 01 and in other Proposals to encourage more than the minimum figure to be provided. The Core Strategy already provides for independent testing of viability arguments supporting a proposal for less than 30%, so the necessary flexibility is there.

Issue E – Would the Proposal Have an Unacceptable Impact on the Setting of Saltram House?

- 3.22 The issue relates to the inclusion of the western most field on the "northern fields" of Plymstock Quarry; the proposed access to the NP 01 development from Colesdown Hill; and the possible impact of any highway works at the junction of Colesdown Hill and Haye Road on Stag Lodge.
- 3.23 Although there is no statutory or other agreed definition of the "essential setting" to Saltram House, I am satisfied from the evidence and my site inspection that this field is an important part of the House's setting that warrants special protection if that setting and the character of the surrounding area is not to be further eroded. Core Strategy Policy CS 03 seeks to safeguard and where possible enhance the character and setting of historic assets, and paragraph 4.23 goes on to state that more specific policies will be included in AAPs. This AAP does recognise the importance of Saltram in several places, for example in the Area Context section. Whilst I see no need to duplicate the wording of Policy CS 03, I am not persuaded that Proposal NP 01 sufficiently reflects the Core Strategy approach the Council needs to follow in subsequent AAPs. I consider that the protection afforded by NP 01, criterion 1 (a) should be stronger with a clear statement of intent to preserve or enhance the setting of Saltram, to reflect the guidance in PPG15, paragraph 2.8.
- 3.24 The changed wording I recommend does not indicate that the western field should not remain within the NP 01 designation. I also see no merit in including the field in the Countryside Park designation when what is needed is an appropriate degree of control whatever the land use designation. With the form of words I recommend below the AAP will be more consistent with the Core Strategy and Government guidance and will thereby exert the most appropriate control over any possible changes to Saltram's essential setting. As for the definition of "essential setting" there is clearly some work that needs to be done on this between all stakeholders at the planning application stage. However, I do not consider that the AAP is unsound without such a definition, and I would not advocate delaying the adoption of the Plan pending agreement on such a definition.
- 3.25 Turning to the possible impact of the access from Colesdown Hill, criterion 46 of the Proposal should be more strongly worded to make clear the importance of preservation or enhancement of essential setting, in line with criterion 1 (a). I recommend an appropriate form of words below to make the AAP sound in this respect. A similar measure of protection needs to be included in criterion 43 (f) in relation to highway works at the Colesdown Hill/Haye Road junction.

<b>R4</b>	<b>Include in NP 01 the clarification that "In determining the actual number of dwellings to be accommodated on the site, the Proposal will need to be tested against all the criteria identified below". The supporting text should be added to by "The critical issue concerning this site is not the total amount of development but to ensure that whatever development is proposed respects the character of the site and surroundings. Hence the number of dwellings that can be accommodated on the site will be tested</b>
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	<b>against all the criteria set out in the Proposal, and if all the criteria can be met, the eventual number may exceed 1,500. The density of development would clearly need to be compatible with the creation of an attractive living environment, as well as being complementary to the quality and characteristics of the site and its surroundings".</b>
<b>R5</b>	<b>Include the word "at least" before the number of affordable dwellings in NP 01, NP 02, NP 03 and NP 05.</b>
<b>R6</b>	<b>Change criterion 47 to read as in Appendix 1, and by the addition in the supporting text of the words "The Proposal is intended to encourage the move towards zero carbon development in a phased way. The costs and technical viability of this response to Climate Change will be taken into account by the Council in determining planning applications".</b>
<b>R7</b>	<b>Change criterion 1 (a) to read: "The essential setting of Saltram House, Park and Garden must be preserved or enhanced".</b>
<b>R8</b>	<b>Add to criteria 43 (f) and 46 with the words "Proposals for the Colesdown Hill/Haye Road junction and the Colesdown Hill access must preserve or enhance the essential setting of Saltram House, Park and Garden."</b>

### **Proposal NP05 – Sherford and Sports Hub (North Elburton)**

- 3.26 This Proposal is for approximately 320 dwellings, a sports hub to serve east Plymouth and for part of the High Quality Public Transport (HQPT) route. The Proposal is a key element of the AAP, and is based on a clear objective to contribute to creating a sustainable neighbourhood at Sherford that integrates effectively with the wider Plymouth urban area. A series of studies that examined alternatives, including the Enquiry by Design process by the Prince's Trust, and the Eastern Corridor Study, support this Proposal. I find that it is a coherent expression of the cross border issues that have arisen and been resolved by joint working between the Council and South Ham District Council. Because of the cross border aspects, a Joint Hearing Session with the Sherford AAP Examination was held. There are a number of issues discussed at the Hearings that warrant consideration, as follows.

#### **Issue A - The Implications for the King George V (KGV) Playing Fields**

- 3.27 In order to provide the Sherford new community residents with a sustainable mode of transport, an HQPT system is proposed. The route through the new community will entail, in the short term, connecting with the existing highway network at Haye Road and then the A379 at Stanborough Cross. The NP 05 Proposal Plan shows the route crossing the KGV Playing Fields.
- 3.28 The Eastern Corridor Study, which is not challenged by evidence of any comparable depth, examined the alternatives for the alignment of this route. The Study demonstrated that a route along the southern side of the Playing Fields allows for a more direct connection to the long term HQPT alignment. Additional benefits of this alignment include closer proximity of the HQPT service to the existing community and avoiding the dissection of the sports hub. The main impacts of such an alignment are the loss of one existing rugby pitch, the relocation of three pitches, the relocation of car parking and changing accommodation and the use of the HQPT on the character of the Playing Fields. I am aware that a planning application for the new community, which is being

determined by the respective Councils, proposes a slightly different alignment that is claimed to have a lesser impact. This is a not matter that I can comment upon directly other than to state that I am satisfied there is sufficient flexibility within the AAP to accommodate minor variations of that kind at the planning application stage.

- 3.29 In forming a judgment as to whether the above impacts are significant and question the soundness of the Plan, I have taken into account the very large number of representations on this issue. However, I attach greater weight to the benefits of the Proposal in providing the HQPT link and in the creation of a sports hub to serve the eastern side of Plymouth. I agree with the Council that the KGV Playing Fields are a poor quality facility at present, being poorly drained, and used for dog walking and subject to dog fouling. Their location at the back of Elburton further reduces their attractiveness. Just as the Playing Fields were originally donated in 1952 to meet the needs of the then residents of the area, so now the AAP proposals rightly look to the needs of the future population. I am in no doubt that KGV is ill equipped at present to meet those needs.
- 3.30 I am satisfied that the temporary loss of some parts of the Playing Fields to facilitate the HQPT route will be more than compensated by the new sports hub as described in Proposal NP05, criteria 19 to 31. The variety of high quality sports and leisure facilities, including a swimming pool, sports centre, all weather pitches, gym and social facilities will be a vast improvement on what is available at present. Moreover, the sports hub will be more central to surrounding residential development, both uniting but separating the existing and new communities at Plymstock, Elburton and Sherford. The sports hub will be part of a green swathe of land linking through the proposed Country Park and Saltram House. As for the possible impact of the use of the HQPT route on the character of the playing fields, there are numerous examples across the UK where transport routes and recreational facilities happily co-exist. I therefore attach little weight to this argument against the Proposal.
- 3.31 My conclusion, supported by the evidence base for this Proposal and also on the absence of any substantial evidence of any other proposal that would deliver these kinds of benefits, is that the Proposal is the most appropriate in all the circumstances, and is sound. I have considered the argument that there could be legal impediments to the disposal of part of the Playing Fields for the HQPT route but the balance of evidence suggests to me that this will not be an insurmountable difficulty.

#### Issue B - What Is the Possible Impact of the Proposal on Existing Residents?

- 3.32 Sherford and the other major residential developments proposed for the area will clearly cause considerable and significant change to the appearance and character of this part of Plymouth. This change will be rather like the change that must have occurred in the post War era when a large number of houses were built to accommodate many of the current residents of Plymstock and Elburton, some of whom have objected to the AAP. Substantial urbanisation will bring additional movement and a general feeling that the area has become much more built up. There is, in general terms, bound to be some impact on private property interests but these have to be weighed against the wider public benefits arising from the proposals to accommodate strategic housing requirements. These are inevitable consequences of the need to provide additional housing for the planned expansion of Plymouth as well as to redress the general shortage of homes for local people, as reflected in high house prices, the widening affordability gap and the difficulties experienced by many in starting on the housing ladder. These are problems the Government wishes to see urgently addressed by local planning authorities and the communities they serve.

- 3.33 One potential impact of the Proposal that was discussed at the Hearings was the possible impact on properties in Vinery Lane, in particular the appropriateness of the HQPT route connecting Sherford with the existing urban area as shown in the AAP. The evidence submitted by the Council on the process leading to the selection of the preferred route for the HQPT is strong and compelling. The Enquiry by Design exercise and the Eastern Corridor Study both extensively and comprehensively examined the alternative routes for the HQPT link, given the preferred location for the new community at Sherford.
- 3.34 In stark contrast to these exhaustive studies, there is insufficient evidence that the selection of the preferred route along the southern side of the KGV Playing Fields, as shown in the AAP, was not properly appraised. I place weight on the fact that the AAP route would not require any properties in Vinery Lane to be demolished. The AAP will, as it should, guide consequent negotiations between landowners and developers and provide the appropriate framework for the Council to determine planning applications. The Council does accept that the AAP needs to be clearer on the need to protect residential amenity and provide any necessary mitigation measures in that process. Changes to criteria 31 and 39, as detailed in Appendix 1, would make the AAP sound in this respect.
- 3.35 A further possible impact might be on properties in Elburton Road. There is no doubt that the A379 will become a busier route into the City, this being an unavoidable consequence of planning to accommodate the strategic housing requirement. However, the AAP rightly seeks to accommodate as much as possible of the additional traffic arising from this housing growth in ways that do not involve additional private car use. The evidence base supporting the HQPT route is substantial. In the short term, the route will follow Elburton Road but the long term route to the north will deliver shorter journey times that will encourage even greater bus patronage. I accept that some residents of Elburton Road will feel that they may then be surrounded by traffic. However, the best evidence shows that the HQPT route using the former rail alignment through Moorcroft Quarry is the most efficient means to deliver the bus based public transport system the new community deserves, but Elburton Road is still required to accommodate other traffic. The AAP Proposals Map shows broad alignments only, and there is clearly scope within the Major Scheme Bid and the planning application for the detailed design of the route to be examined, adjusted and for measures to be proposed to mitigate any adverse impact on existing residents.

Issue C - Would the Proposal Have a Harmful Effect On Either The Setting Of Saltram House Or The Plympton St Maurice Conservation Area?

- 3.36 Based on my site inspection of the area and having seen the degree of separation and topography between the Proposal, Saltram House and Plympton St Maurice Conservation Area, as well as considering all the evidence, I am satisfied that the Proposal will have no adverse visual impact on either. I consider that Core Strategy Policy CS 03 is a sufficient safeguard, and no change to the AAP is required. The only possible adverse impact on the Conservation Area would be from additional traffic. However, the need to manage any such adverse impact is recognised, and mitigation measures are part of Proposal NP 09.
- 3.37 In conclusion, I find that this Proposal is well justified by the Council's evidence base. It is clear that alternatives have been considered and the current Proposal is the most appropriate in all the circumstances. The AAP is sound subject to the one change recommended below.

<b>R9</b>	<b>Change criteria 31 and 39 of Proposal NP 05, as detailed in</b>
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	<b>Appendix 1.</b>
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**Proposals NP06 – Future Development Options North of Elburton**

- 3.38 This Proposal relates to the land to the north east of Elburton and up to the HQPT link, and is intended to safeguard the land for residential development after 2016. In my view, such a form of development would clearly be sustainable, being located next to the existing main body of development in Elburton and close to the HQPT and Sherford new community. However, the need for and consequences of development are not established in the AAP but will need to be so in a subsequent revision. Until that point is reached, both the title and the text of this section needs to be more circumspect, indicating that this is not a firm Proposal but a Policy to safeguard land. Also, contrary to the second sentence of paragraph 5.29, it should be made clear that no decision will be taken until the need for development is established and any environmental impact considered. The Plan should be changed as recommended below to make it sound.

<b>R10</b>	<b>Change Proposal to Policy NP 06</b>
<b>R11</b>	<b>Delete paragraph 5.29 and especially the reference to “this development must go ahead”; and change the first sentence of paragraph 5.30 to read: “ This is a Policy to safeguard land to meet possible strategic housing need after 2016, No decision on development will be taken until current needs, alternative options, and a sustainability assessment have been considered”.</b>

**Proposals NP07 to 09 – HQPT, Improvements to Public Transport Services in Plymstock, and Highway Infrastructure Improvements and Traffic Management**

- 3.39 These Proposals aim to develop a sustainable transportation network for east Plymouth to cater for existing and future residents. The Proposals are clearly based on the AAP's Objective 3. The evidence base, principally the Eastern Corridor Study, underpinning the Proposals is robust and credible. A range of measures and initiatives are proposed to discourage private car use and encourage alternative transport modes. These Proposals are consistent with the Core Strategy's approach of developing sustainable neighbourhoods linked by public transport. The issues that warranted discussion at the Hearings were:

Issue A - Does the AAP Provide for an Appropriate, Achievable and Sustainable HQPT Route to the A379 via Haye Road and Stanborough Cross?

- 3.40 The transportation proposals for the Sherford new community are rightly not based on a “predict and provide” approach for car borne journeys but instead provide a bus based system. The HQPT route will start adjacent to Deep Lane junction on the A38, follow Sherford Main Street and then link to Haye Road and the A379 at Stanborough Cross with signalised junctions giving the necessary priority to public transport. Beyond 2016, the route through Moorcroft Quarry will further improve journey times.
- 3.41 The critical points on the network will be at Haye Road and Stanborough Cross. The best evidence is that Haye Road is wide enough to accommodate predicted traffic flows without any property acquisition. Stanborough Cross however will

need remodelling to cope, changing it from a roundabout to a signalised junction. Again, I am satisfied with the best evidence that only one property would need to be acquired and possibly demolished to facilitate such a scheme. There is no evidence that this is unachievable. I accept that even with these improvements there will be some junction queuing at peak times but this is an acceptable aspect of the priority to be accorded to public transport, and may well encourage greater use of the HQPT. I attach significant weight both to the evidence base supporting this Proposal, principally the Eastern Corridor Study, and to the fact that the AAP Proposal has support from all the relevant public authorities that have the responsibility to ensure that the new community is delivered and is able to be served by the most sustainable form of transport.

- 3.42 I am satisfied on the evidence before me that the AAP Proposals represent the most sustainable option with the shortest possible journey time from the northern limit of Sherford to the City Centre. In contrast, sufficient evidence of any alternative site for the new community and how that would be served by an HQPT was not complete and available before the start of the Examination. What is known is that the alternative site to the east, known as "Sherford Refined" would entail longer journeys of up to 1 km to the City Centre. In addition, I consider that any advantage gained from utilising an additional section of the existing dual carriageway from Stanborough Cross to the eastern edge of Plymouth would be outweighed by the need to use the poorly aligned and narrow single carriageway section of the A379 from the eastern limit of Plymouth to Chittleburn Cross. I fail to see how using this section of the A379, which is little better than a minor country road, could be consistent with the concept of an HQPT. My conclusion in this respect derives from discussions with my colleague who examined the Sherford AAP.
- 3.43 I therefore consider that the AAP Proposal does provide for an appropriate, achievable and sustainable HQPT route. This agrees with the findings of my colleague Nigel Payne, the Sherford AAP Inspector. This aspect of the AAP is sound and no changes are justified.

Issue B - Should the AAP Include Provision Of A Park And Ride Site On the A379?

- 3.44 The Devon Structure Plan proposed a Park and Ride site on the A379. However, the more recent and comprehensive Eastern Corridor Study does not support such provision. The AAP, based on this later evidence does not propose a Park and Ride site at present but the Council does retain a long term aspiration for a site on the A379. I accept that there is some obvious advantage in intercepting some traffic travelling from the South Hams to Plymouth and providing for travellers to transfer to public transport. However, there is insufficient evidence before me on how and when such a site would be a viable facility. Accordingly, I conclude that this aspect of the AAP is sound and no change is required.

### **Proposal NP10 – National Cycle Network (NCN) Proposal - Whether the AAP Will Realise the Potential to Improve Cycling Facilities as an Alternative Transport Mode?**

- 3.45 Proposal NP 10 requires that all development should facilitate the implementation of NCN Route 2 along the eastern Corridor. More generally, the AAP seeks to facilitate cycling as an alternative transport mode, and provision is made to achieve that in all the AAP's proposals for residential development. For example criterion 10 of NP 03 specifically provides for the delivery of part of NCN Route 2. Cycling is promoted throughout Proposals NP 03, NP 05, NP 07 and NP 09. There is however, a minor issue of consistency in wording across these proposals. It is important that all the relevant Proposals are equally supportive of cycling unless there are clear reasons why this mode of transport cannot be encouraged. The

revised version of the AAP, at Appendix 1, removes those inconsistencies and establishes this aspect of the Plan as sound.

<b>R12</b>	<b>Change the AAP's references to cycling in accordance with Appendix 1.</b>
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**Proposal NP15 – Moorcroft Quarry - Whether the Proposal Should Specify Waste Management Uses?**

- 3.46 Proposal NP 15 provides for waste management uses when the land there is no longer required to support mineral extraction. Importantly, the site will also be required to accommodate the long term HQPT link to the City. The Proposal is also concerned with nature conservation and with facilitating the NCN Route 2. There is however some confusion as to the way the Proposal is worded and with the form and extent of acceptable waste management uses. The Council has confirmed that it will be for the Waste DPD to explore the options for waste management facilities throughout the City, and Moorcroft Quarry will be included in that assessment. However, it can be confirmed now that there will be no proposal for landfill at Moorcroft. The Waste DPD will specify the extent of land required for any waste management proposal at Moorcroft. The only part of the current Proposal that is in fact a firm proposal is that relating to the HQPT link. The AAP would therefore be made sound if it removed this confusion in accordance with the amended text in Appendix 1.

<b>R13</b>	<b>Change NP 15 to include only the need to safeguard land for waste management uses when these are specified in the Waste DPD. It should also confirm that landfill will not be proposed. The revised wording in Appendix 1 is recommended.</b>
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**Proposal NP16 – Land North Of Hazeledene Quarry**

- 3.47 This Proposal safeguards land for its potential to accommodate long term development beyond 2021. The Proposal contains eight criteria that must be met. The issues discussed at the Hearings were the appropriateness of safeguarding land when development requirements are not known, and whether development of this land would have an adverse impact on the essential setting of Saltram House.
- 3.48 I am in no doubt that safeguarding policies can be included in the AAP, as the Plan needs to look beyond its current end date and have regard to the opportunities that might be available to accommodate Plymouth's continuing need for land to meet its growth agenda. Nevertheless, the Council accepts that this Proposal would be better described as a Policy as the need for development beyond 2021 has yet to be established. In addition, even if such a need is established, the Policy should make it clear at this stage that the need would be accommodated only if important criteria such as the sustainability of development in that area and the effect on the essential setting of Saltram House, Park and Garden are able to be met. The changes to NP 16 at Appendix 1 make the AAP sound in these respects, and have my support.

<b>R14</b>	<b>Change NP 16 in accordance with the wording at Appendix 1.</b>
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### **Whether the AAP Should Include Additional or Alternative Housing Sites?**

- 3.49 The AAP makes provision for in the region of 2,500 additional dwellings by 2021, in accordance with Policy CS 16 of the Core Strategy. The Council is required to consider alternative sites to meet this housing requirement, and the presumption is that the sites proposed in the AAP are the most appropriate in all the circumstances. I have already considered Wixenford Quarry as a potential housing site allocation. The only other site put forward at the Examination for allocation, and supported by an appropriate level of evidence, is a 0.5 hectare site at Haye Road, the Stanborough Nursery site.
- 3.50 The merits of residential development there were considered and rejected by me on appeal in 2005 but there are now different circumstances requiring a reappraisal. In the first instance, the Sherford new community and the requirement to provide the long term HQPT link necessarily redefine the extent and role of the green gap between Plymstock and Plympton. In that context, I no longer consider that the Stanborough Nursery site fulfils a useful function as green space. Some form of residential development on the site would be a much more appropriate use and could well facilitate the construction of the HQPT route. The Council is willing to remove the site from the Greenspace notation on the AAP Proposals Map, and I recommend that this be done.
- 3.51 The second matter that arises is whether there is justification to specifically allocate the site for residential development, thereby placing it in the same category as the major allocations in the AAP. There is no suggestion that the Nursery site should replace one of those allocations. In terms of whether there is a need for an additional site, I do not consider that there is sufficient strong evidence in this case to cause me to question the ability of the sites already allocated to deliver the required number of dwellings. The possibility of under achievement of housing targets in the City as a whole was not in doubt at the Core Strategy Examination. I am satisfied that there is likely to be sufficient capacity in the City for the strategic housing requirements to be met, certainly as far as 2021. However, the AAP should contain more detail on housing delivery by specifying the rates of delivery on brown field and green field sites to provide the necessary reassurance that this aspect of the AAP is sound. This is achieved by the replacement Section 7 recommended below.
- 3.52 An additional reason for not allocating the Nursery site is its small size. At 0.5 hectare, the site could yield around 25 dwellings but in the context of the sites that are allocated in the AAP, the site could not be described as a strategic site and important to the achievement of the Plan's objectives. The site is more akin to a small windfall site that could make a useful contribution rather than play a critical role. Accordingly, I do not support allocation of this site but do feel that any proposal for residential development, especially one that facilitates the long term HQPT link, could be considered by Core Strategy Policy CS 16.

<b>R15</b>	<b>Remove the Stanborough Nursery site from the Greenspace notation.</b>
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- 3.53 In conclusion I find that the AAP Proposals for housing allocations are the most appropriate in all the circumstances, the relevant alternatives at Issues and Options stage having been considered, and being founded on a robust and credible evidence base. Test of Soundness 7 is therefore met subject to the changes recommended above.

### **In Relation to Test of Soundness VIII:**

- 3.54 The Council accepts that this Section needs to be changed to reflect the changes made to the Core Strategy's monitoring section and in the light of the guidance in PPS3. The replacement Section 7 expands the description of the proposed monitoring framework using the Annual Monitoring Report, and contains housing delivery timescales and the Housing Trajectory. The replacement Section 7 is much clearer on the way in which progress on implementation will be monitored. With this change I am satisfied that Soundness Test 8 will be met.

<b>R16</b>	<b>Change Section 7 in accordance with Appendix 1.</b>
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**In Relation to Test of Soundness IX:**

- 3.55 The AAP promotes and provides for a significant degree of change mainly by virtue of the Proposals for residential development. To a certain extent, each of these is independent of the rest, and there is therefore sufficient flexibility in the AAP in the sense that the Plan does not require implementation of all the Proposals for success. Perhaps the most sensitive Proposal is the HQPT in that it is dependent on significant funding being available. I have no evidence to doubt that of the Council's that all the right steps are being taken to secure this funding through the Local Transport Plan 2 and the Major Scheme Bid. There is evidence that the funding is likely to be available on time and no evidence to the contrary. I am also satisfied that the Proposals and Policies in the AAP are sufficiently flexibly worded to enable them to provide a robust and consistent framework for considering planning applications. This Test of Soundness is therefore met.

**Overall Conclusion**

- 3.56 I therefore conclude that, with the recommended changes in this report, the AAP satisfies the requirements of s20 (5) (a) of the 2004 Act and the associated Regulations, **is sound** in the context of s20 (5) (b) of the 2004 Act, and meets the tests of soundness in PPS12 (¶ 4.24).

*Douglas Machin*

**Inspector**

**21 May 2007**

## **APPENDIX 1**

**THIS IS DOCUMENT PCC NPS0013. IT IS A REVISED VERSION OF THE SUBMITTED AAP, WHICH INCLUDES:**

- **THE CHANGES REQUIRED TO MAKE THE AAP SOUND (AS PER THE RECOMMENDATIONS IN THE BODY OF THIS REPORT);**
- **MINOR CONSEQUENTIAL CHANGES; AND**
- **EDITING AND FORMAT IMPROVEMENTS TO REMOVE UNNECESSARY SUPPORTING EVIDENCE AND DUPLICATION OF CORE STRATEGY POLICIES.**

**FOR THE AVOIDANCE OF DOUBT, ALL CHANGES ARE RECOMMENDED BY THE INSPECTOR.**

**-----End-----**