

---

## **REPORT TO PLYMOUTH CITY COUNCIL**

**by Douglas Machin BSc Dip TP MRTPI**

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

the Planning  
Inspectorate  
Temple Quay House  
The Square  
Temple Quay  
Bristol BS1 6PN  
T 01272 373300  
F 01272 373300

13 April 2007

---

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

## **REPORT OF THE EXAMINATION INTO THE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT**

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

**Examination Hearings Held Between 30 January and 8 February  
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 Core Strategy in terms of the above matters, along with my recommendations and the reasons for them. In assessing the soundness of the DPD, I have had regard to all the matters raised in the representations to the Core Strategy.
- 1.3 My report follows the Core Strategy's order, and under each principal issue I identify 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 Core Strategy sound are contained in the body of my report, and should be read in conjunction with a revised version of the Core Strategy, which is Appendix 1 (Document PCC CS022). The latter reflects all the changes the Council needs to make as well as the minor consequential changes and editing of the submitted DPD 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 Core Strategy. 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 Core Strategy.
- 1.4 My overall conclusion is that the Core Strategy is founded on a substantial evidence base and it is sound provided the changes I recommend are made. With these changes, the Core Strategy will provide a good framework for the subsequent Area Action Plans that together will allow the City to achieve its Vision. None of the changes require that the Strategy be subject to a further Sustainability Appraisal. There is nothing in this report that prevents the Core Strategy being adopted as soon as the Council wishes.

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

- 2.1 The production of the Core Strategy is identified in the Council's Local Development Scheme (LDS), which was adopted in July 2005. I am satisfied that the Core Strategy 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 Strategy 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 Core Strategy's preparation has had a sustainability appraisal, and the submitted Core Strategy has been subject to a satisfactory Strategic Environmental Assessment. The third Test of Soundness has therefore been met.
- 2.2 In addition, the Council has completed a Habitats Regulations Assessment to determine whether policies and proposals in the Core Strategy will have a significant adverse impact on nearby Natura 2000 sites. It is concluded that some policies and proposals would have an adverse effect unless mitigation measures are included. I am satisfied that the Core Strategy contains sufficient policies, suitably amended in a minor way by the changes in Appendix B, to allow for mitigation of any significant adverse impacts. No further changes are needed to make the Core Strategy sound in this regard.

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

### **In General:**

- 3.1 Government guidance on what a Core Strategy should include is contained in Planning Policy Statement (PPS) 12 – Local Development Frameworks and its Companion Guide. Further helpful guidance is contained in the Planning Advisory Service document - Core Strategy Guidance (2006). Essentially, a Core Strategy should comprise a spatial vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery. A Core Strategy should also seek to implement the spatial and transport policies of the regional spatial strategy (RSS) and incorporate its housing requirement. It should set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community services, essential public services and transport development. It should have clear policies for delivery and the policies and proposals should provide certainty for the future with a timescale of at least ten years but it should also aim to look ahead to any longer term horizon set out in the RSS.
- 3.2 The Core Strategy for the City of Plymouth contains a very powerful vision that by 2020 Plymouth will be one of Europe's finest, most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone. This Vision is set out in "Towards a Sustainable Community Strategy". This is then articulated for all the Core Strategy's components, providing clear directions of travel for the Strategic Objectives and policies in each section. These set out the spatial implications of the Community Strategy. There is no evidence to suggest that this element of the Core Strategy is anything other than sound. I am satisfied that Soundness Test 5 is met. The Strategy does provide broad locations for the delivery of housing, employment and other elements essential to the achievement of the Vision. It also looks beyond the time scale of the current plan, providing the agenda for growth beyond 2021.

- 3.3 In terms of the conformity soundness test, the South West Regional Assembly has stated that the Core Strategy conforms to the draft RSS and it is consistent with the Devon Structure Plan (DSP). Neither is there any doubt that the Core Strategy seeks to implement key elements of Regional Planning Guidance 10 (RPG10), and the draft RSS. In general terms, there is no evidence to suggest that the Core Strategy's provisions are not consistent with national planning policy and Government guidance. It is clear that the Council has worked closely with adjoining local authorities, and the Core Strategy is consistent with the plans of those authorities, especially the proposals for the Sherford new community.
- 3.4 In terms of coherence, consistency and effectiveness, the Strategic Objectives and policies within the Core Strategy are largely consistent within themselves, cross border issues are dealt with, and apart from the absence of a vision for the Port of Plymouth and the demonstration of a comprehensive arrangement for monitoring, and there are no obvious gaps in the Core Strategy's coverage.
- 3.5 The evidence base supporting the Core Strategy is comprehensive, detailed, robust and credible, and there is no significant challenge to it. The evidence base is well documented and compiled, and comprises a series of reports and studies covering all the relevant matters. It is clear that a great deal of impressive background work has been done in the lead up to the Core Strategy, and the latter is suitably selective in its reliance on that material. The Core Strategy reflects the options and choices that have been made at various points in the plan making process, although the Council accepts and I agree that the Core Strategy should be edited to remove some of the now superfluous supporting information before it is adopted. This is not a question of soundness but a change worth making to achieve a more focussed plan. In addition, it would be helpful to combine the policy content of the various Strategy Diagrams into one Diagram, leaving the current Diagrams 1 – 10 as purely illustrative.
- 3.6 With the agreed change to the Monitoring section, the Core Strategy will have a clear mechanism for progress to be reviewed via the Annual Monitoring Report (AMR). Soundness Test 8 can therefore be met. The Core Strategy is flexible enough to respond to changing circumstances to a certain degree, although the Council is aware that the current plan will need to be rolled forward at regular intervals, especially to ensure consistency with the longer timescale of the draft RSS. Soundness Test 9 will therefore be met.

<b>R1</b>	<b>Combine Strategy Diagrams 1 – 10.</b>
-----------	--

- 3.7 In the light of this generally positive assessment of soundness, I consider the specific issues relating to soundness, which are mainly concerned with Test 7, whether the Core Strategy's policies and proposals are the most appropriate in all the circumstances.

**Section 1 - The Degree of Conformity of Housing and Employment Provision with RPG10 and the draft RSS, and Consistency with the DSP - Soundness Tests 4 and 9.**

- 3.8 The following matters need to be considered in relation to this issue:
- The appropriate timescale for the Core Strategy;
  - Whether the Core Strategy will be able to accommodate the step change in housing growth being considered in the draft RSS;
  - Whether the employment land provision is in conformity.

- 3.9 With regard to the appropriate timescale for the Core Strategy, I have considered whether the Core Strategy should be extended to 2026 to match the draft RSS. There is some merit in synchronising the two plans in this way. However, PPS12, paragraph 2.14 advises that a core strategy should be for a period of at least ten years from the date of adoption but should also look ahead to any longer-term time horizon which is set out in the relevant regional spatial strategy. This Core Strategy is visionary, looking very much towards 2021 and beyond when Plymouth's aspirations to become a world class waterfront city of over 300,000 people will be realised.
- 3.10 In my view, provided the rate of development and direction of travel are consistent with the draft RSS, and there is no substantial evidence that they are not, then I am satisfied that the fifteen year period for this Core Strategy is an appropriate compromise, and strikes the right balance between reality and aspiration. Extending the Strategy's end date to 2026, and thereby making this a 20 year Core Strategy, would impose too much rigidity and inhibit the options available when the plan is rolled forward. Nonetheless, there is scope to achieve greater clarity by explaining how the Core Strategy's choice of timescale fits with that of the draft RSS, thereby providing reassurance that the currently expected RSS levels of growth will be able to be accommodated.
- 3.11 Turning to Core Strategy's housing provision; the main question discussed at the Hearings was whether the plan is able to accommodate the higher levels of growth being discussed at Regional level. The Council's assessment based on its Urban Capacity Study and more recently on preparation of the relevant Area Action Plans, which has not been challenged, strongly indicates that higher levels of growth can be accommodated within the City. The following table from the Council's statement (PCC CS006) is particularly helpful in understanding this conformity question:

**Table 1 – Conformity of Housing Provision with RPG10 (DSP) and RSS**

	2001-2006	2006-2011	2011-2016	2016-2021	2021-2026
RPG10/DSP	10,000				
RSS		10,000		14,500	
RSS+		13,870		18,940	
CS	3,000	10,000		7,250	
SUPPLY	3,000	13,300		7,700	11,000

Note: Supply does not include windfall allowance for the period 2006-2016, nor post 2021

- 3.12 From this table, I am satisfied that the Core Strategy is able to accommodate both the DSP and the RPG10 housing requirement. More importantly though, the Regional Assembly has confirmed that the Core Strategy is in general conformity with the draft RSS. The latter requires provision to be made for 24,500 dwellings during the period 2006-2026, an annual average rate of 1,225. It is clear that this figure is an acknowledgement of, and encouragement to, the desire to achieve the Vision for Plymouth. The above table demonstrates that the current draft RSS housing requirement can be met. Nevertheless, there is still some uncertainty in the level of growth envisaged, and the City Council has been asked to consider the implications of an even higher level of growth, up to 32,800 dwellings in the 20 year period. The latest Council estimates of potential housing supply for the period 2006-2026 indicate a capacity for 32,000 dwellings

(excluding an allowance of over 2,000 for windfalls, subdivisions, empty home reductions and living over the shop).

- 3.13 In the event that an even higher requirement emerges in the adopted RSS, then that would require the Core Strategy to be reviewed but at this point I am satisfied that there is no question of non conformity between the two plans. Nevertheless, it would improve the Core Strategy's clarity and consistency and make it sound if two changes are made. These are to simplify the relationship between the DSP, RPG10 and the draft RSS; include the above table, and to include the words "at least" before the numbers in the first sentence of Policy CS15 so that it is clear that the City's aspiration for higher levels of growth beyond 2021 is not constrained by the numbers in the Core Strategy.
- 3.14 Turning to conformity in relation to employment land supply, because the Plymouth City Council administrative area is only one component, albeit the major one, in a much wider functional employment area, the Core Strategy needs to be clear on the relevant figures. Section 6 is somewhat confusing in that it is not clear in various parts whether it is the City Council area, the Principal Urban Area (PUA) or the Travel to Work Area (TTWA) that is being considered. Furthermore, Policy CS04 actually reads as if employment land outside the City boundary will be identified by a City Council DPD, which would not be possible unless done jointly with neighbouring authorities. Again, SO6 contains a target relevant to the PUA, which is confusing. As a minimum, CS04 and SO6 need clarification, with consequential changes to the whole of Section 6 to avoid ambiguity over the area being considered.
- 3.15 As for the actual employment land provision to be made, the Regional Assembly and Devon County Council have indicated conformity. The Council is able to convincingly demonstrate that its evidence base, in the form of the 2006 Employment Land Review (ELR) supersedes the information supplied for the draft RSS. More realistic assessments of the land required to support the desired employment growth have been made by the City Council. The ELR shows that the 42,000 jobs that the draft RSS states should be created in the TTWA by 2026 are achievable, and recent monitoring information indicates that this can be done in the City using less land than previously assumed. Nevertheless, the Core Strategy needs to be clearer on the assessment process that will take place when appropriate sites are identified in subsequent DPDs. The ELR will be the first stage in the assessment process, and some sites that may not be deemed suitable at this stage may indeed be shown to be eventually suitable.
- 3.16 In conclusion, I am satisfied that the Core Strategy is consistent with the DSP, and in conformity with RPG10 and more importantly the draft RSS. However, as discussed at the Hearings, the following changes are needed to make the Core Strategy sound:

<b>R2</b>	<b>Change paragraphs 1.15 and 1.16 as in Appendix 1.</b>
<b>R3</b>	<b>Include the table above as Table 4.</b>
<b>R4</b>	<b>Add "at least" before the figures of 10,000, 17,250 and 3,300 in the first sentence of Policy CS15.</b>
<b>R5</b>	<b>Reword Policy CS04 as detailed in R14.</b>
<b>R6</b>	<b>Amend Target 1 of SO6 as in Appendix 1.</b>

## **Section 5 - Whether The Area Visions And Strategies Are Appropriately Detailed, Linked and Prioritised – Soundness Test 7.**

- 3.17 The Core Strategy identifies nine priority areas because of the opportunities offered for change, their City wide importance, or their urgent need for regeneration. These areas are listed in SO5, and the Area Visions are intended to act as a guide to the preparation of Area Action Plans (AAP). They demonstrate how the theme of building sustainable linked communities, which is at the heart of the Core Strategy, can be translated from theory to practice. There is no challenge to this approach which, in my view, provides an excellent context for the Strategic Objectives and Policies that follow in the later sections. I endorse the Area Vision approach as one that provides a long term spatial vision and focus on those parts of the City that will experience the most significant change and be instrumental in delivering the overall Vision for Plymouth. I find the approach is sound and consistent with the guidance in PPS12, paragraph 2.9.
- 3.18 Nevertheless, I consider that there is some confusion in SO5 as to the relative priorities accorded to the AAPs listed therein. The City Council clarifies in its response to this issue that the priority areas are located both within the established historic waterfront areas and within the areas of opportunity along the Eastern and Northern corridors that link to strategic transport nodes. These priority areas also allow for long term and flexible development opportunities. The Council accepts the numbers in SO5 should be removed to avoid giving the impression of a different priority, and an explanation of why the priority areas have been selected is needed. There is also the opportunity to make the Strategy sound by clarifying that the Area Vision Diagrams are not potential allocation plans but provide the foundation for the subsequent AAPs.
- 3.19 A further point on clarification that was discussed was whether the scale of change in some or all of the Areas could be indicated in the Core Strategy. However, although the Core Strategy ought to be as specific as possible about the scale of change, identifying sites and the level of housing provision to be made, bearing in mind all relevant factors, such as flood risk, would be problematical. To attach specific housing growth figures to each Area Vision, over and above the information in Strategy Diagram 6, would be difficult and potentially misleading at this stage.
- 3.20 The Area Vision that generated most discussion at the Hearings was that for Derriford and Seaton. There the Vision is essentially to provide a new heart to the northern part of Plymouth to complement the City centre, and thereby assist in the creation of a bi-polar economy. There is no support at regional planning level, let alone by the City Council, for the view that Derriford should replace the existing City Centre in the long term. The Council is correct, in my view, to follow a cautious approach to the pace of change being planned for at Derriford, and the Core Strategy should not be driven by short term commercial considerations.
- 3.21 I accept the point that a large shopping centre at Derriford could have a long lead time but that should not be allowed to exert undue pressure on decision making, properly led by the spatial planning approach of Plymouth's LDF. I am in no doubt that the priority is to maintain the vitality and viability of the City Centre, and the pace of change at Derriford must be determined by that consideration. For that reason, the Council is correctly prioritising the work it needs to do on the AAPs for the City Centre and Derriford, which will be progressed together. It may well be that Derriford grows beyond the size normally associated with a District centre, and becomes more like a town centre. The test as to whether it should be allowed to so expand will be related to whether any proposal would not undermine the regional shopping role of the City Centre, and would provide benefits for the rest of the City.

- 3.22 The debate on the main location for the new centre at Derriford highlights the need for those with interests in the area to wait until the proper survey, analysis and plan work has been completed before commitments are made that might prejudice the long term development of Derriford. At this point, the balance of evidence persuades me that the focus of the new District or larger centre should be to the west of the A386 and not the east. Notwithstanding the very considerable employment uses, including Derriford Hospital, situated to the east, clearly serving those uses will be only one of the new centre's functions. In contrast, in so far as the A386 is somewhat of a barrier, there is clearly much greater potential for the longer term expansion and future success of the new centre if it looks to the west of that road with the focus on the large existing and future residential areas to the west and north west.
- 3.23 Whilst sites either side of the A386 discussed at the Hearings have relative advantages and disadvantages, it would be inappropriate for a Core Strategy to be site specific. An indication of broad locations only is what is called for. The Vision would be made sound by a brief explanation of the preference at this stage for the focus of the new centre being west of the A386, that it will have the potential to expand and play a wider role in the City as part of a bi polar economy, and also to clarify the illustrative nature of the public transport interchange arrangements as shown on the Proposed High Quality Public Transport (HQPT) Network diagram.
- 3.24 Before leaving Derriford, the question arose as to the provision made in the Area Vision to achieve a reduction in noise levels arising from the operation of Plymouth City Airport. Current and predicted noise levels are included in the Plymouth Airport Study by York Aviation (2006). The Study will inform work on the relevant AAP and decisions about any future expansion of the Airport. However, I do not see any justification to add to or alter the Derriford and Seaton Area Vision to include details of Airport noise parameters. The Core Strategy has adequate policies, and the City Council has other means at its disposal, to control this matter. No further detail in the plan is necessary.
- 3.25 Area Vision 8, North Plymstock (including Minerals) indicates on the Vision Diagram that the potential direction for future growth could be in a westwards direction towards Saltram House. Area Vision 8, criterion 8, safeguards potential post 2016 development options and paragraph 5.85 explains that the need for additional development beyond 2021 will be dependent on a future assessment of need and the ability of the local economy to support future growth. I agree with the Council that it is appropriate to safeguard future options to accommodate growth beyond the current timescale of the Core Strategy. This does not pre-judge decisions that will have to be made at the appropriate time, taking into account all relevant factors, not least the possible impact on the setting of Saltram House. This approach is supported by the guidance in PPS12, paragraph 2.14. Nevertheless, this Area Vision could be made sound by expanding the criteria that will be used to assess development options to include a sustainability appraisal.
- 3.26 A further point on this Area Vision is the appropriate level of detail to show on the Cross Border Vision Diagram in respect of the Sherford new community. As the majority of that development will be within South Hams District, I agree with the Council that it is preferable to "grey" the part of the diagram within that District. Also, in view of some uncertainty at the time of writing this report on the precise alignment of the HQPT route through the new community, a broader arrow indicating the route is appropriate for the plan to be sound.
- 3.27 In summary, I find that the Area Visions and Strategies Section can be made sound by the changes recommended below. The Visions provide the appropriate level of guidance and are sufficiently flexible to accommodate a limited degree of

change in key elements such as housing growth levels, as and when these are determined through the AAPs.

<b>R7</b>	<b>Delete the numbers in SO5 and add a new paragraph 5.2 to read as in Appendix 1.</b>
<b>R8</b>	<b>Clarify the role of the Vision statements by adding a new paragraph 5.3 to read as in Appendix 1.</b>
<b>R9</b>	<b>Add a new paragraph 5.78 to read as in Appendix 1.</b>
<b>R10</b>	<b>Add the word “illustrative” to the HQPT diagram title, and clarify on the Area Vision Diagram that the Transport Interchanges notation is symbolic to cover a number of potential interchange points.</b>
<b>R11</b>	<b>Add a new paragraph 5.68 to the North Plymstock Area Vision to read as in Appendix 1.</b>
<b>R12</b>	<b>On the North Plymstock Area Vision Diagram distinguish land within the City from land outside, and represent the cross border transport link to Sherford by a broad arrow.</b>

**Section 5 – Should the Core Strategy Include an Area Vision for the Port of Plymouth? – Soundness Tests 6 and 7.**

- 3.28 The Vision for Plymouth aims to create one of Europe's finest, most vibrant waterfront cities. However, I find that the Core Strategy is somewhat inward looking in the sense that it lacks a focus on the Port of Plymouth, and how the potential could be realised to achieve the City Vision. Strategic Objectives 1 and 2 contain no mention of the Port or water related activity and development. Reference to these is found in some Policies, such as CS04 and CS28, but the potential for expansion of water dependent employment, transport and leisure development, and the Core Strategy's role in that, is not as clear as it could be. In addition, given that Plymouth is one of the Nation's three important Naval Bases, it is somewhat surprising that the Core Strategy has little to say about the Council's approach to development in this sector.
- 3.29 I know that the City Council and all relevant authorities have a well established management framework for the Tamar estuary. However, a Vision with a wider scope to capitalise on Plymouth's outstanding waterfront location whilst providing protection for important wildlife habitats is needed, in my view. I am aware that pioneering work has been done by the City Council and other stakeholders on evaluating the potential of the Port of Plymouth. The Port of Plymouth Area Recreation Study should be re-visited, especially in the light of the Government's intention to introduce a statutory framework for Marine Spatial Planning. I consider that this subject matter is an important aspect of Plymouth's potential that needs to be re-addressed by the Council.
- 3.30 I therefore consider that there is currently a gap in the Core Strategy's coverage, and the Objectives and Policies are not the most appropriate in all the circumstances. Further to discussion at the Hearings, the Council acknowledges that the Strategy is deficient but could be made sound by the inclusion of an additional Area Vision and Strategy for the Port of Plymouth that would provide an impetus and a framework for the development of a Coastal Supplementary Planning Document (SPD). The inclusion of such an Area Vision has not had the

benefit of prior public consultation but in so far as it draws together elements of the Core Strategy and provides a focus for further work that will allow all stakeholders to be involved, I am content that this is an appropriate, as well as necessary, change that can be made to the submitted Core Strategy.

<b>R13</b>	<b>Include the Area Vision for the Port of Plymouth, as detailed in Appendix 1.</b>
------------	---

**Section 6 - Whether The Assumptions On Employment Growth Are Sound And Sufficiently Justified – Soundness Test 7.**

- 3.31 Part of the Vision for Plymouth is the creation of a City that creates and shares prosperity. As paragraph 6.1 of the Core Strategy points out, unlocking Plymouth's economic potential underpins the City's aspirations for Urban Renaissance. Only by sustained economic improvement can the City make its contribution to the national and regional economies, and become the economic hub of the far South West. Paragraph 4.4.5 of the draft RSS points out that Plymouth has emerged from a period of fundamental economic restructuring with the City's economy modernising, moving away from a dependency on Ministry of Defence activity. It continues that the main strategic planning issue for the City is how best to stimulate economic potential, deliver a step change in employment and bring about an improved quality of life for all residents.
- 3.32 The Core Strategy's Economy section 6 is, as with the rest of the Strategy, founded on an evidence base that is thorough, up to date and formidable. It comprises a comprehensive examination of the economy and of employment land carried out in two employment land reviews and the Sustainable Growth Distribution Study. That examination was carried out within a policy framework set by the DSP, the draft RSS, the Regional Economic Strategy, and the Vision for Plymouth. I do not question this evidence base, and there is no evidence to substantially challenge the assumptions on employment growth and locations. The Core Strategy makes it clear that the industry sectors that are expected to experience the most growth and therefore lead the renaissance of Plymouth are business services, creative industries, tourism and leisure, medical and healthcare, marine industries, and advanced engineering. It is the land requirements of these types of employers that rightly determine the provision made by the Core Strategy. Policy CS04 properly sets these requirements as minimum figures that will not constrain the identification of additional employment sites if these are needed to sustain regeneration later in the plan period. This is consistent with the longer term view of Core Strategies advocated by PPS12.
- 3.33 However, some change is necessary to make the plan sound. As I have already recommended, a thorough edit needs to be made of Section 6 to avoid confusion on the contribution that the Core Strategy can make to meeting employment growth in the wider Plymouth employment area. In addition, the Core Strategy should further define the types of employment that would be expected to grow in various parts of the City. The Policy and supporting text also need to be updated with revised employment land requirements arising from the adjustment of the base date of the evidence. This spatial articulation of employment provision will add more clarity and certainty to the employment land assumptions. With such changes I am satisfied that this part of the Core Strategy can be made sound.

<b>R14</b>	<b>Change Policy CS04 to read as in Appendix 1.</b>
------------	---

## **Section 7 - Whether The Retail Strategy Is Supported By Appropriate Evidence – Soundness Test 7.**

- 3.34 Government guidance on the role of plans at the local level is provided by PPS6. Paragraph 2.15 states that local planning authorities should adopt a positive and proactive approach to planning the future of all types of centre within their areas. A Core Strategy should set out a spatial vision and strategy for the network and hierarchy of centres, including local centres, setting out how the role of different centres will contribute to the overall spatial vision.
- 3.35 Paragraph 7.3 of the Core Strategy makes it clear that its role is to set out a proactive strategy for shopping, focussed on promoting the vitality and viability of the City's shopping hierarchy, encouraging a wide range of services which allow genuine choice in a good quality environment, with a vibrant mix of activity, which is accessible to all. This will be achieved by directing new retail development such that it contributes to delivering the City Vision, improving existing retail facilities, addressing deficiencies in the retail hierarchy, as well as planning for future growth. Paragraph 7.4 goes on to state that the Strategy starts from a "sequential approach" to locating the appropriate type and scale of development in the right type of centre. The Strategy also addresses the need to rebalance the shopping network.
- 3.36 There is no dispute over the aims of the Strategy in these respects. It is based on an up to date and very comprehensive shopping study by Cushman and Wakefield (2006), which is largely accepted as being thorough and definitive. However, the Council also acknowledges that shoppers' surveys and retail impact assessments are not an exact science and need to be continually updated to remain relevant to decision making. I am satisfied that the Shopping section of the Core Strategy is firmly based on Government guidance and there is no substantial evidence to suggest that it is not appropriate in all the circumstances. There are however issues about the appropriate form and scale of new shopping provision at firstly, Derriford; and secondly, Weston Mill.
- 3.37 With regard to the Derriford the concept is clear and will provide the necessary guide to determine the form, scale and precise location of the centre, and the rate at which it is deliverable, having regard to the need to carefully assess the impact on existing centres including importantly the City Centre. Criterion 1 of Policy CS07 highlights the Council's concern not to undermine the vitality and viability of the City Centre by taking pre-emptive decisions about Derriford. The Core Strategy provides the vision and direction of travel but it cannot and should not contain the detail that will follow more extensive work for which there is a clear timetable in the Local Development Scheme. I support the Core Strategy in its approach to Derriford, and find no unsoundness.
- 3.38 In relation to Weston Mill, again the need for the proposed food store at Weston Mill is not challenged but there is an issue about ensuring that the viability of existing shopping centres and stores is not undermined. The Council accepts that its evidence on over-trading, which partly justifies the proposal, may have exaggerated the position. However, the need for a new medium sized food store was acknowledged by the Secretary of State in a decision on a proposal for a larger food store than the one now being contemplated. The Council clearly recognises the need to assess the impact of proposals as and when they come forward with up to date information at the time. Policy CS07 specifically requires all proposals for Weston Mill and elsewhere to be justified by a detailed retail impact assessment of the effects on existing nearby centres. There was no evidence to persuade me that existing retail interests could be better protected than by the existing provisions of the Core Strategy.

- 3.39 In conclusion, there is insufficient evidence to question the basic approach of section 7 of the Core Strategy but changes are needed to make the plan sound in respect of S07 and CS08. The objectives of S07 need to be re-ordered to reflect the more logical order of starting to strengthen existing centres and then moving on to remedy deficiencies. CS08 needs to be corrected to ensure consistency with PPS6 by deleting in (2) "in or" as development in district centres is not required to meet a proven need.

<b>R15</b>	<b>Change S07 (4) to read as in Appendix 1.</b>
<b>R16</b>	<b>Change CS08 (2) to read as in Appendix 1.</b>

## **Section 10 - Whether The Assumptions On Housing Growth And Locations Are Sound And Sufficiently Justified - Soundness Tests 7 and 9.**

- 3.40 Government guidance on the delivery of housing is contained in PPS3 – Housing (December 2006). The Core Strategy was not prepared in the context of that guidance but nevertheless I am satisfied that it is in conformity with it. The Core Strategy supports the Government's four strategic housing policy objectives, listed in paragraph 9. In particular, looking at the detailed outcomes that the Government expects the Core Strategy and the operation of the planning system to deliver, there is a large measure of consistency.
- 3.41 In relation to the quality and standard of new housing development, the Core Strategy devotes Section 4 to delivering a quality City, and this is supported by policies in the remainder of the plan that strive to raise standards. This part of the Core Strategy allows the Council to build on its success in promoting high quality design projects, such as the RTPI award winning scheme for the redevelopment of the South Yard Enclave at Devonport. It is also clear that the Core Strategy aims to deliver a high quantity of housing to support a growth agenda, at least to the current draft RSS level. Included in this quantum is an element of affordable housing, the need for which is supported by an up to date strategic Housing Market Assessment. Furthermore, and most importantly, the essence of the Core Strategy's approach to housing provision is to ensure that growth occurs in sustainable mixed communities, building on existing neighbourhoods, and planning for new communities, especially in the Eastern Corridor, to complement the Sherford new community.
- 3.42 The locations for new development have been informed by an Urban Capacity Study, collaborative working with neighbouring authorities, and the Sustainability Appraisal. The programme for the AAPs has allowed work on those plans to inform the Core Strategy. The latter seeks to make the best use of the redevelopment opportunities within the existing City framework, with a target for 80% of new dwellings to be on previously developed land. The plan also includes an objective to ensure that at least a five year supply of housing land is available for development. This will be demonstrated within the AMR which will show how the supply of deliverable sites will be rolled forward to continue a five year supply.
- 3.43 A Housing Delivery Action Plan, which is being prepared, will identify how any potential obstacles to maintaining a five year supply are to be overcome. It will also identify those strategic sites that are critical to the delivery of housing. In addition, the AAPs and a Key Sites Allocation DPD will show sites for a further five, and possibly, ten, years supply of housing. The Core Strategy also prioritises the release of housing sites, with priority being given to previously developed land in the City Centre and waterfront regeneration areas, the North Plymstock Eastern Corridor and the Derriford Seaton Northern Corridor.
- 3.44 Bearing in mind the newness of PPS3, there is a need to make some changes to the Core Strategy, mainly to demonstrate beyond doubt that the latter is sound. These are discussed below:
- The detail in the Housing Trajectory.
  - How the spatial distribution of housing growth has been arrived at.
- 3.45 In relation to whether the Housing Trajectory is sufficiently detailed, the Core Strategy is clearly not a housing allocation DPD and therefore I agree with the Council that there is a limit to the degree of detail that should be provided. Even so, I am satisfied that the Trajectory does meet the guidance at paragraph B28 of PPS12. However, in order to provide reassurance that assumptions used to

determine future housing land supply are based on a realistic view of the past, and therefore raise confidence in the Core Strategy, I consider that the Trajectory should be more detailed on the components of future housing supply, for example the split between green field and brown field sites. This is important given the expected role of previously developed land in providing housing sites and achieving the Vision for a sustainable City. Such detail is readily available in the Council's 2006 Annual Monitoring Report (AMR), and ought to be able to be included at an appropriate level in the Core Strategy without compromising its clarity. The Core Strategy should also reflect the latest guidance in PPS3 on how windfalls should be treated. Tables 6 and 7 and the plan generally should be updated in the light of the latest AMR and the work on housing capacities being done for the AAPs.

- 3.46 Turning to the spatial distribution of housing growth, it is appropriate, as paragraph 2.10 of PPS12 makes clear, that the Core Strategy should only identify broad locations for future development rather than specific sites. The latter will be identified in the AAPs, for which the Council's revised Local Development Scheme sets down a clear and realistic programme for delivery. Those pursuing site specific interests need to wait for due process to occur when all potential sites to allow the Strategy to be achieved should be evaluated fully at a detailed level rather than compromising now the strategic nature of the Core Strategy. Nevertheless, a fuller explanation preceding Policy CS16 and to justify Strategy Diagram 6 as to why various broad locations in the City have been selected for growth and why they are prioritised in the way they are, would make the plan sound. Tables 6 and 7 should also be combined to give a clearer picture of the spatial distribution of housing growth in the City.

<b>R17</b>	<b>Remove from Table 6 the windfall allowance for the period 2006 to 2016, revise the allowance for 2016 to 2021 to 1,165, and combine Tables 6 and 7 to produce a new Table 5 which shows the spatial distribution of new housing.</b>
<b>R18</b>	<b>Include the latest 2006 AMR figures in Tables 6 and 7.</b>
<b>R19</b>	<b>Amplify the Housing Trajectory to show the breakdown of anticipated housing supply in terms of green field and brown field sites as well as actual and anticipated windfalls.</b>
<b>R20</b>	<b>Expand the justification for the spatial distribution of housing sites as justification for the priority given in CS16 as in Appendix 1.</b>

**Issue 7: Whether the Appropriate Level Of Affordable Housing Will Be Delivered – Policy CS15 – Soundness Test 7.**

- 3.47 Paragraph 27 of PPS3 makes it clear that the Government is committed to providing high quality housing for people who are unable to access or afford market housing. PPS3 goes on to say that Local Development Documents should set an overall, plan-wide, target for the amount of affordable housing to be provided. Policy CS15 does this by stating a target of 3,300 affordable dwellings, and requiring 30% of private sector developments on qualifying sites of fifteen dwellings or more to be affordable without public subsidy. The main issue is whether the Policy is appropriately worded or could be clearer and more ambitious.

- 3.48 The extent of affordable housing need in the Plymouth Housing Market Area is revealed by the 2006 Housing Market Needs and Assessment Report, which estimates that the annual affordable housing requirement is greater than the overall housing provision being made for the City. As the Report acknowledges, at paragraph 19.6.8, all this identified need will not be met, and an appropriate level of affordable housing should be sought, having regard to all the circumstances relevant in Plymouth. The definition of affordable housing has been changed by PPS3, and the Core Strategy needs to reflect that in order to be sound in this respect.
- 3.49 A balanced judgement is necessary to determine the extent to which affordable housing need can be satisfied, having regard to the Core Strategy's top priority to achieve urban regeneration and deliver the City Vision. However, I consider that it is also important that there is some consistency with the draft RSS and with the adopted South Hams District Core Strategy, especially in view of the substantial development planned at Sherford and North Plymstock. The draft RSS, in Policy H1, requires at least 30% affordable housing and urges in paragraph 6.1.8 that LDD policies should routinely require more than that whilst recognising the danger of stifling overall housing growth through over-ambitious requirements. The South Hams Core Strategy requires up to 50% affordable housing to be provided. There is no dispute that much of the development planned in the City will be on the more difficult and costly brown field sites where securing affordable housing as part of the redevelopment scheme may be more challenging. Nevertheless, there will also be a substantial amount of new housing on sites that are less constrained.
- 3.50 The Council has had lower and higher affordable housing targets, ranging from 25% to 55% but now relies on recent evidence as to what has been achieved on some sites to justify the 30% limit in the Policy. Because of the way the Policy is worded, when the contribution of sites developed with public subsidy is taken into account, then the overall proportion of affordable housing achieved is expected to be greater than 30%, thereby moving towards greater consistency with the RSS and South Hams. It was agreed that the Core Strategy should be amended to reflect this point. Even taking this into account, I consider that the Policy should aspire to achieve a higher percentage of affordable housing, as recommended in the draft RSS, unless independently carried out viability assessments indicate that development and regeneration prospects would be jeopardised. Accordingly, I consider that Policy CS15 should qualify affordable housing figures with "at least" to encourage more to be sought and provided. I am not aware of any district wide viability assessment to test the 30% or a higher figure as per paragraph 29 of PPS3. However, on the basis of an aspiration to guide negotiations, I consider that the Core Strategy would be sound if it followed the lead of other authorities in this respect. In the event of dispute, independent judgements on viability could be sought
- 3.51 I am also guided by paragraph 96 of the document "Delivering Affordable Housing" (DCLG 2006), which states that the Government is keen to encourage the provision of affordable housing without grant where possible. In order to encourage alternative and grant free providers, as paragraph 51 of the above document explains, "without grant" would be a better term to use in CS15 than "without subsidy" to acknowledge the potential contribution from a variety of sources and to encourage innovation in affordable housing provision.
- 3.52 Furthermore, criterion 3 of the Policy is an overly strict interpretation of Government guidance in that PPS3, paragraph 29, requires a robust justification for off-site provision not, as CS15 states, only allowing such provision in exceptional circumstances. I consider that off-site provision can be a useful and flexible option especially in the creation of balanced, mixed and sustainable

communities. Subject to these changes, Policy CS15 and the supporting text are sound, and I recommend accordingly.

<b>R21</b>	<b>Qualify the Policy CS15 figures of 3,300 and 30% by "at least", and change "without public subsidy" to "without public grant", with consequential changes to the supporting text.</b>
<b>R22</b>	<b>Change Criterion 2 of CS15 to read as in Appendix 1.</b>
<b>R23</b>	<b>Include the definition of affordable housing used in PPS3 in paragraph 10.20, as in Appendix 1.</b>
<b>R24</b>	<b>Change paragraph 10.32 to read as in Appendix 1.</b>

**Section 11 - Whether the Core Strategy Contains an Appropriate Response to the Challenge of Climate Change, Including the Assessment of Flood Risk – Soundness Test 7.**

- 3.53 Effective spatial planning is one of the many elements required in a successful response to the pressing issue of climate change. Emerging Government guidance on how the spatial planning response to climate change should be embedded in Core Strategies is contained in the Supplement to PPS1 "Planning and Climate Change" (DCLG 2006).
- 3.54 Reading the Core Strategy as a whole, the sustainable long term growth of the City is provided for by urban concentration, the re-use of previously developed land and building sustainable communities, linked by a High Quality Public Transport system. More particularly, there are various Strategic Objectives and Policies in the Plan that embody sustainable development principles and the response to climate change, for example SO1 (1 and 5), SO3 (2 and 6), CS01, S010 (2), CS16 (1), and SO11 amongst others. Policy CS34 seeks development that performs well against climate change, as well as other criteria. There is also a brief section on climate change and resource use on page 114. Notwithstanding these provisions, the Core Strategy would be sound if the climate change issue is given greater prominence towards the front of the plan. A lead could be taken from the draft RSS in this respect where the first two Policies, SD1 and SD2, signal the pre-eminence of climate change as the issue to be addressed by that plan. Such an approach would then provide a more appropriate context for Plymouth's growth agenda, and the Core Strategy's provisions in this respect.
- 3.55 Turning to the issue of whether flood risk is properly assessed and accommodated in the Core Strategy, the discussion at the Hearings persuaded me of the adequacy of the evidence base for this issue. It is clear that the Council has been well aware of flood risk for a considerable period; this is not a matter that has emerged when the Core Strategy was submitted for adoption. I am satisfied that flood risk has been adequately assessed at all stages in the preparation of the Core Strategy. The requirement for a Strategic Flood Risk Assessment, introduced by PPS25, has been met by a Level 1 Assessment, and further work is underway to produce a Level 2 Assessment to support the more detailed requirements of the work for the AAPs.
- 3.56 Policy CS21 should, however, be changed to reflect more closely the guidance on the Exception Test in PPS25. The Policy would then be quite clear that development proposals must assess flood risk. Perhaps some confusion arises

from the Area Visions sections of the Core Strategy and the Vision Diagrams therein. The latter are not proposals maps and do not pre-determine the acceptability of development proposals as and when they come forward. The Visions need to be read in conjunction with Policy CS21. Therefore, I am satisfied the Core Strategy, with the above change, is fundamentally sound in relation to flood risk, and no further change is needed. It is clear, though, that there is a need for closer engagement in the plan making process by all with an interest in this area to avoid in the future the confusion that has arisen with this issue.

<b>R25</b>	<b>Raise the prominence of sustainable development and climate change by including in Section 1 the text as in Appendix 1.</b>
<b>R26</b>	<b>Change CS21 to read as in Appendix 1.</b>

**Section 11 - Whether The Public Transport Provisions Are Credible And Likely To Deliver More Sustainable Transport Choices - Soundness Test 7.**

- 3.57 It is clear that achieving the Vision for Plymouth requires a radical change in transport patterns. The level of population and housing growth envisaged by 2021 and then beyond cannot be supported if travel patterns are not influenced by spatial planning, giving more opportunities for walking and cycling, and transport mode choices widened by substantial investment in public transport. Demand management and better use of telecommunications are also important. The Core Strategy's approach of developing sustainable neighbourhoods and maximising the opportunities for high density development on previously developed land, is the appropriate first stage in this process, and there is no evidence to suggest that this is an unsound approach.
- 3.58 The focus of discussion at the Hearings was the HQPT system to link, eventually, all parts of the City. I heard that a good start has been made on implementing this system with the A386 Park and Ride and public transport interchange, and the introduction of new buses. The increase in bus patronage achieved to date by these improvements alone gives confidence that that this is a credible approach and one that is delivering more sustainable transport choices. The Council's evidence persuades me that the Local Transport Plan and delivery mechanisms for the HQPT's extension are clear, are supported by all the relevant bodies, and it is shown that appropriate steps are being taken to secure the necessary funding from the Regional Assembly. The concern of the Highway Agency and others that the HQPT system needs to be available at the outset of the planned expansion of the City is acknowledged by the Council but there was no suggestion from any quarter as to what more could be done by the City Council to deliver the planned system.
- 3.59 Accordingly, there is no evidence to suggest that this part of the Core Strategy is anything other than sound subject to a number of minor changes to the Core Strategy that would improve its clarity and focus in relation to the HQPT, and the contribution that better rail transport facilities could make.

<b>R27</b>	<b>Change CS 27 to read as in Appendix 1.</b>
------------	---

**Section 14 - To What Extent, If At All, Should Airport Expansion Be Encouraged, Having Regard to the Need to Reduce Carbon Emissions – Soundness Test 7.**

- 3.60 Policy CS27 is a firm expression of the Council's support for a fairly detailed plan to expand Plymouth Airport, and the issue turns on whether the Policy is justified in its current form. CS27 arises from a study into the viability and potential of Plymouth Airport (Plymouth City Airport Study (2006) – York Aviation. The Study is detailed and comprehensive and presents a stark choice. If no improvements are made at the Airport, it will probably close. The current main runway will become obsolete with the use of the next generation of Regional aircraft that will come into service during the lifetime of the Core Strategy. The Study points out the Airport's significant economic value to the City, the important role it could play in delivering the Vision for Plymouth, and the lack of any alternative site for the Airport. There is no evidence to dispute these findings.
- 3.61 I have to consider the findings of the above study and Policy CS27 in the context provided by the Air Transport White Paper 2003, the White Paper Progress Report 2006, RPG10 and the draft RSS. As far as the Government's policy approach is concerned, it is very clear that in the light of the forecasts of growth in air transport, a balance needs to be struck in decisions on airport improvement and expansion between economic, social and environmental considerations. The carbon emissions resulting from the forecast growth in air transport should be managed using market mechanisms and by removing barriers to behavioural change in the way passengers perceive air travel. This approach is supported by the recently published Stern Review of the Economics of Climate Change. The Government is working to secure the inclusion of international air travel in the European Union Emissions Trading Scheme. The Government considers that Regional airports can fulfil a valuable role in relieving pressure on the larger airports, and reduce surface journeys by passengers wanting to fly.
- 3.62 As far as regional planning guidance is concerned, I am clear that it does not have a role to question the National air transport forecasts. RPG10, Policies TRAN2 and 9, encourage the sustainable development of Regional Airports to enhance the competitiveness of the South West. The draft RSS provides a more up to date context with the issue of climate change being given very serious consideration and appropriate balances being made with the rise in demand for air travel. Policy TR9 states that an increasing proportion of regional demand should be met by airports such as Plymouth's to reduce leakage to other regions and London. Plymouth is seen as continuing to provide business links to international hubs and London while facilitating tourist visits to the Region.
- 3.63 Within this context, I would not be justified in concluding that a policy for the improvement and expansion of Plymouth City Airport is not soundly based. Whilst concerns over the contribution of air travel to climate change are valid and need to be taken very seriously they need to be addressed by Government policy and its approach to ensuring that air passengers contribute to the cost of their activity, including the environmental impact. The Core Strategy cannot disregard Government policy and national air transport forecasts and simply "go it alone" in making decisions that would possibly inhibit proposals that could have considerable economic benefit as well as some environmental ones.
- 3.64 The current Policy CS27 subjects any proposal for improvement/expansion to an environmental impact assessment but it is not clear how far such an assessment would go and what matters would be covered. I consider that the Core Strategy could be innovative and soundly based if it took the opportunity to explicitly reflect the Government's emerging approach to balancing the economic, social and environmental benefits with climate change considerations. The White Paper Progress Report at paragraphs 2.34 to 2.37 declares the intention to consult on

the proposal for an emission costs assessment to inform decisions on major increases in aviation capacity whereby airport operators could aim to become carbon neutral.

- 3.65 Such an approach would be consistent with the overall approach of the Core Strategy and the draft RSS. Airport proposals for Plymouth should, in my view, be accompanied by an environmental statement that considers all costs and benefits, and embraces the opportunity to achieve reductions in contributions to climate change by offsetting and balancing impacts at a local level. Under this approach, a proposal to expand capacity to allow a comparatively very modest increase at Plymouth would examine, amongst other matters, the net increase in carbon emissions after taking into account the use of more efficient and modern aircraft, the reduction in surface travel to other airports, the potential to reduce emissions from surface vehicles and recycling as well as any other matters. Policy CS27 should remain in the Core Strategy but I consider that it should be qualified to more explicitly allow for balanced judgements to be made as and when any proposal for improvement/expansion of Plymouth City Airport comes forward. Such a change would achieve more consistency with Government policy and the RSS, and places this aspect of the Core Strategy on a sound foundation.

<b>R28</b>	<b>Change paragraph 14.23 to read as in Appendix 1.</b>
------------	---

#### **Section 17 - The Adequacy of the Monitoring Framework - Soundness Test 8.**

- 3.66 The Council has recognised that this Section of the Core Strategy could be considerably improved to provide greater clarity on how the plan, monitor and manage approach will operate. The proposed replacement for Section 17 shows clearly the targets and milestones that relate to the delivery of policies, how such progress will be measured, and who will deliver the outcomes. The Core Strategy is unsound without this degree of detail, and it should therefore be included. Whilst the replacement for Section 17 has not been the subject of public consultation, it merely elaborates the monitoring framework and mechanisms that the Council already uses and does not introduce anything new or controversial, in my assessment. It also follows Government guidance on best practice in this regard. Therefore I am content that this is an appropriate and necessary change to make to the Core Strategy. I recommend the change detailed in Appendix 1C.

<b>R29</b>	<b>Include a new Section 17 as detailed in Appendix 1.</b>
------------	--

**In Conclusion:**

- 3.67 I therefore conclude that, with the recommended changes in this report, the Core Strategy 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**

**30 March 2007**

## **APPENDIX 1**

**THIS IS DOCUMENT PCC CS022. IT IS A REVISED VERSION OF THE SUBMITTED CORE STRATEGY, WHICH INCLUDES:**

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

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

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