

## Appendix IX

# SUMMARY OF JLP POLICY OPTIONS CONSIDERED BY THE JLP LOCAL PLANNING AUTHORITIES AND THE DECISIONS TAKEN

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The main areas of alternative options which have been considered by the LPAs through the plan making process relate to the distribution strategy and the scale of housing provision. Further evidence about those options is set out in:

- ‘Deciding upon the distribution of development’ Topic Paper November 2016 (Appendix X)
- The Housing Topic Paper March 2017 (available on line at <http://web.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/plymouthplan/ppevidencebase.htm>)

However, for completeness and for the avoidance of doubt, all 145 policies in the Plymouth and South West Devon Joint Local Plan : Publication Plan are listed in the following tables, where Option 1 is “Do not include a policy” and Option 2 is “Include policy as set out in the JLP Document”. Some policies have additional options which are specified in the table.

In all cases the LPAs conclude that Option 1 is not a reasonable alternative option because it fails to provide necessary, appropriate guidance and because other available policy such as the National Planning Policy Framework is not sufficient to guide decision making in the local circumstances, meaning that the plan would not provide a clear indication of how a decision maker should react to a development proposal, contrary to NPPF paragraph 154. The LPAs consider that this would lead to the plan being found not sound.

The summary of reasoning provides more detail on why Option 1 (and other specified options) is not a reasonable alternative and is rejected (and the decision to reject is indicated by an ‘X’). Alternatives that are not reasonable do not need to be subject to the detailed Sustainability Appraisal/SEA.

The reasons for selecting Option 2 are explained in Appendix XII of this Integrated Assessment. Option 2 is considered to be a ‘reasonable alternative’ for all policies (and the decision to accept this is indicated by a ‘✓’). Reasonable alternatives are subject to detailed Sustainability Appraisal/SEA.

It is emphasised that these are the joint decisions made by the Local Planning Authorities through their plan-making work, but it is necessary for the Sustainability Appraisal/Strategic Environmental Assessment to report those decisions.

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
<b>SPATIAL POLICIES</b>	<b>For Policies SPT1 to SPT13 (inclusive) Option 1. as set out below</b>		<b>For Policies SPT1 to SPT13 (inclusive) Option 2. Include policy as set out in the JLP Document</b>		<b>For Policies SPT1 to SPT13 (inclusive) :</b> <ul style="list-style-type: none"> <li>• <b>Reasons for selecting Option 2 is as set out in Appendix 4 to this Integrated Assessment.</b></li> <li>• <b>Reasons for rejecting all other options are set out below for each policy</b></li> <li>• <b>Note: Failure to fully convey policy would not be consistent with the last sentence of NPPF</b></li> </ul>
SPT1 Delivering sustainable development	Option 1. Do not include a policy	X	Option 2.	✓	Whilst NPPF policy may provide a certain level of guidance, it is considered that the absence of additional guidance would fail to fully convey a locally appropriate policy for sustainable development as the framework for growth and change in the plan area
	Option 3. PINS model policy	X			Option 3 is rejected - The model policy that had been advocated in previous years by the planning inspectorate is no longer published by PINS
SPT2 Sustainable linked neighbourhoods and sustainable rural communities	Option 1. Do not include a policy	X	Option 2.	✓	Whilst SPT1 and NPPF policy may provide a certain level of guidance, it is considered that the absence of additional guidance would fail to fully convey a locally appropriate policy to guide development and growth which supports the spatial strategy through creating neighbourhoods and communities in the plan area.
SPT3 Provision for new homes					NOTE: More detailed assessment of Options 2, and 6 to 16 are set out in the November 2016 Topic Paper 'Deciding upon the distribution of development'
	Option 1: Do not include a policy	X			Option 1 is unrealistic and not a reasonable alternative. The JLP must plan for and identify the scale of housing provision for the plan period if the JLP is to be consistent with NPPF and to be found sound.
<i>SPT3 : Total housing provision</i>					
	Option 3: Total housing provision significantly greater than Option 1	X	Option 2.	✓	Option 2 is based on the Preferred Option identified in the November 2016 Topic Paper 'Deciding upon the distribution of development'. Option 2 provides necessary, locally specific policy, informed by robust assessment of need, and the translation of need into housing provision requirement as set out in the Housing Topic Paper.)  Option 3 is rejected because the evidence about housing need does not support a scale of provision higher than Option 1. It is therefore not a reasonable alternative. More details for rejecting Option 3 are set out in the Housing Topic Paper.)

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
					<p>Note:</p> <ol style="list-style-type: none"> <li>1. A higher total housing provision (29,600) was indicated in the previous July 2016 consultation booklet 'Thriving Towns and Villages, based on the June 2016 OAN evidence (PBA).</li> <li>2. earlier consultation on the Plymouth Plan (Jan 2015) was underpinned by evidence of housing need of 22,766 homes during the plan period (2011-2031)</li> <li>3. The 2014 SA for the earlier consultation on the West Devon Our Plan (Reg 19) considered growth options and distribution options. The West Devon Strategic Housing Market Needs Assessment (2013) presented 3 scenarios for growth which the SA assessed: <ul style="list-style-type: none"> <li>o Scenario 1: Demographic trend-based projections (Indicative requirement - 199-285dpa)</li> <li>o Scenario 2: Moderate employment-led projection (Indicative requirement – 250dpa)</li> <li>o Scenario 3: High employment-led projection (Indicative requirement – 337dpa)</li> </ul> </li> </ol> <p>Note: the JLP focuses on Policy Area provision as the basis for delivering the Vision, Objectives and strategy , it does not focus on LPA administrative boundaries</p>
	Option 4: Total housing provision significantly less than Option 1	X			<p>Option 4 is rejected because the option would lead to the JLP failing to accommodate the scale of housing need evidenced by the OAN contrary to NPPF, even though the supply evidence demonstrates that the need could be met within the plan area.</p> <p>The SA for the earlier consultation on the West Devon Our Plan (Reg 19) considered growth options and distribution options A 'no growth' option was not considered a realistic alternative as:</p> <ul style="list-style-type: none"> <li>o it would conflict with requirements in the NPPF, such as to 'significantly boost the supply of housing'</li> <li>o it would not meet communities housing needs.</li> <li>o It would severely limit economic growth and regeneration in the borough</li> <li>o Current sites already have planning permission</li> </ul>
<i>SPT3: Policy Areas - housing provision</i>					
	Option 5: 18,200 dwellings in Plymouth Policy Area and 8,500 dwellings in Thriving Towns and Villages Policy Area	X			<p>Option 5 is based on only Plymouth City need being met in the Plymouth Policy Area, and all of the South Hams and West Devon housing need (excluding the Dartmoor National Park allowance) being met only in the Thriving Towns and Villages Policy Area. This option is considered to be unrealistic and therefore not a reasonable alternative, and is therefore rejected. Detailed assessment of this option and the reasoning is set out in the Housing Topic Paper.</p>

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
	<i>SPT3: Distribution strategy options#</i>				The analysis of options for the distribution of development is set out below in the context of housing. It is also relevant to Policy SPT4, TTV1 and TTV2, but is not repeated in that part of this table relating to SPT4, TTV1, TTV2
	Option 6: Urban Intensification A – only within Plymouth City administrative boundaries	X			Whilst Option 6 strongly aligns with the strategic objectives towards focussing growth at Plymouth and supporting its regional role, the travel implications with potential impacts on air quality, and likely impacts on green spaces and flood risk, could make this option particularly challenging. The Housing Topic Paper March 2017 does not demonstrate that all the housing need for the plan area could be met within the City. Even if other sites in the City were to be allocated, this would not be sufficient to meet the JLP housing target. It would also fail to provide appropriate development at settlements within the Thriving Towns and Villages Policy area, including affordable dwellings. Option 6 is therefore not realistic, and is not a reasonable alternative.
	Option 7: Urban Intensification B – including urban extensions in the city’s urban fringe.	X			Options 6 and 7 are the similar except that development would also occur as urban extensions in the city’s fringe, primarily on greenfield sites. This would provide sufficient growth potential to meet the needs of Plymouth City, but even if other sites in the City were to be allocated, this may not be sufficient to meet the JLP housing target, or at least not without increasing the area covered by the urban fringe. This would raise issues about the travel implications with potential impacts on air quality, and likely impacts on green spaces and flood risk. The Distribution of development Topic Paper concludes that such development would lead to high levels of growth on the fringes of the city which could have serious implications in terms of landscape character and setting of the Dartmoor National Park and other important sensitive landscapes including the AONB. In particular, this approach could have impacts on settlements such as Wembury, Roborough, Brixton, Yealmpstone and Yelverton by changing their character and causing a blurring of the edges of the city and contributing to town cramming and urban sprawl. It would make this option particularly challenging. It would also fail to provide appropriate development at settlements within the Thriving Towns and Villages Policy area, including affordable dwellings. There are already completions and commitments in the Thriving Towns and Villages Policy area Option 7 is therefore not realistic, and is not a reasonable alternative.
	Option 8: Concentration A - Concentration on Plymouth and adjoining settlements, creating a ‘necklace’ of settlements/garden villages.	X			The focus of development would be in and around the city and could be considered to be similar to the urban intensification options. The main difference is that there would be a separation between the city plus its fringe and the necklace of settlements/garden villages.  Furthermore, as highlighted in the Distribution of development topic paper, the necklace approach would mean that all settlements adjacent to Plymouth's urban fringe will need to accommodate significant amounts of development regardless of their current size and level of facilities. Some settlements would be close to Dartmoor or other areas of restraint. The scale of development to be accommodated in such sensitive locations would have

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
					implications that could be difficult to avoid or mitigate that would be consistent with the purposes of the statutory designated areas. Option 8 is not realistic and therefore is not a reasonable alternative, because it does not provide opportunities for the rest of the JLP Area to grow and to meet needs locally such as the need for affordable housing and accommodating labour supply locally to reduce the need to travel.
	Option 9: Concentration B - Concentration on Plymouth and key transport corridors	X			Evidence in the housing topic paper and the housing trajectories, together with SHLAA evidence does not demonstrate that focussing development in the key transport corridors would provide sufficient supply capacity. This option would also significantly reduce the potential to deliver affordable housing across the Thriving Towns and Villages Policy Area, and leave some main towns and smaller towns and key villages without appropriate levels of growth commensurate with their roles, and could lead to more extensive commuting to work in these settlements, or otherwise have an adverse impact on future labour supply in those areas. Option 9 is not realistic and is therefore not a reasonable alternative. However, it can be part of the approach to Options 11-14.
	Option 10: Concentration C - Concentration on Plymouth and New Settlements	X			The Distribution of development Topic paper concludes that Option 10 would only become a realistic and sensible option if there was no other way to accommodate the needs of the HMA, and the solution would also need to support the growth of Plymouth to ensure it maintains its key strategic role as a regional growth centre. A new settlement could relieve pressure for development on existing settlements but have significant development impacts on the character of the local area. As the evidence in the Housing Topic Paper demonstrates that there is sufficient supply identified to be able to meet the forecast housing need, then this option is not necessary. At this time there is no evidence of a new settlement that would deliverable in the plan area, and consequently Option 10 is not realistic, and therefore not a reasonable alternative for this plan.
	Option 11: Concentration D - Concentration on Plymouth and the Area Settlements	X			Area settlements (now retitled as Main Towns in the JLP) are on important transport corridors. The distribution of development topic paper concludes that Option 11 provides a good balance between concentrating development at Plymouth, whilst also providing for sufficient development to meet needs and reinforce the sustainability of key settlements in the wider area. However, there are a range of constraints to be taken into account. The Housing Topic Paper demonstrates that housing supply in other rural settlements, as well as the Main Towns, is necessary to achieve the 'headroom' as well as the total supply to meet forecast need, and to provide affordable housing which is needed in the Thriving Towns and Villages. Therefore Option 11 is a reasonable alternative, but does not perform as well as Options 12 to 14, and is therefore rejected
	Option 12: Concentration E- Concentration on Plymouth, Area Centres	X			Options 11 and 12 are the same except that the latter expects some development in the Local Centres (now entitled Smaller Towns and Key Villages in the JLP). This would enable the smaller towns and key villages to continue to play their important role as local service centres for their surrounding areas. As noted by the Distribution of development Topic

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	and Local Centres.				<p>Paper, some of these settlements fall within the AONB and therefore if the strategy were to lead to proposals for major development these would need to meet the tests set out in the NPPF. However, the JLP Strategic objective is for delivering an appropriate level and mix of new homes that responds positively to local housing needs and improves long-term sustainability. And for enabling local employment opportunities that can support a thriving rural economy. This would include a mix of market and affordable housing, at a scale appropriate to the settlement and access to services and facilities.</p> <p>However, the Housing Topic Paper demonstrates that housing supply in other rural settlements, as well as the Main Towns and Smaller Towns and Key Villages, is necessary to achieve the 'headroom' as well as the total supply to meet forecast need, and to provide affordable housing which is needed in the Thriving Towns and Villages. Option 12 is a reasonable alternative, but does not perform as well as Options 13 to 14, and is therefore rejected</p>
	Option 13: Concentration F- Concentration on Plymouth, Area Centres, Local Centres and sustainable villages OUTSIDE the AONB	X			Options 13 and 14 are the same except that the former does not expect settlements in the AONB to deliver any new growth. Whilst there will be a significant level of environmental protection, the Distribution of development Topic Paper's assessment concludes that this in itself will result in economic and social impacts that cannot be mitigated by displacing the need to deliver new homes and jobs to areas detached from the areas within the AONB. Whilst this is a reasonable alternative, this option is rejected for this reason
	Option 14: Concentration G- Concentration on Plymouth, Area Centres, Local Centres and all sustainable villages including WITHIN the AONB	✓			Option 14 most closely reflects the strategies previously deployed by each of the Councils, albeit an approach that requires policy intervention to ensure that the growth expectations within the AONB are limited to minor developments, or major development only in instances where paragraph 116 of the NPPF can be satisfactorily addressed. Identifying an appropriate mechanism to ensure proportionate and appropriate growth within the AONB will still provide a strong framework for environmental protection and enhancement, but also ensure that the social and economic needs of all rural communities can be met. It is therefore essential that this option is accompanied by the application of policy to avoid locations which would harm the AONBs and other sensitive environments. Consequently this is a reasonable option, it is accepted as the basis for the distribution strategy in the JLP
	Option 15: Dispersal A City of Plymouth delivers what it can, and the unmet HMA need is dispersed across SHWD across all settlements with settlement boundaries. - ie not in Plymouth urban fringe	X			<p>Option 15 is not realistic because it would not deliver the strategic objectives and JLP vision, particularly regarding the role and growth of Plymouth. Therefore it is not a reasonable alternative. The Distribution of development Topic Paper's assessment concludes that this option :</p> <ul style="list-style-type: none"> <li>• Would lead to fundamentally unsustainable patterns of development which would work against the principle of promoting the growth and transformation of Plymouth, and would lead to the stagnation and failure of the city; and</li> <li>• may not be a robust way of distributing the growth - Development that cannot be met in Plymouth City is dispersed amongst the settlements of South Hams and</li> </ul>

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					West Devon based on whether or not the Settlement has a settlement boundary or not. But some settlements which could benefit from some small scale development are excluded and other settlements which are not considered to be sustainable locations for development are included
	Option 16: Dispersal B: Complete dispersal – development is shared out evenly across all settlements of the HMA.	X			Option 16 is not realistic because it would not deliver the strategic objectives and JLP vision, particularly regarding the role and growth of Plymouth. Therefore it is not a reasonable alternative. The Distribution of development Topic Paper’s assessment concludes that this option : <ul style="list-style-type: none"> <li>• would create the most pressure on the smaller settlements of the HMA and the sensitive environments which the Joint Local Plan aims in principle to protect; and</li> <li>• lead to fundamentally unsustainable patterns of development which would work against the principle of promoting the growth and transformation of Plymouth, and would lead to the stagnation and failure of the city.</li> </ul>

#### # Note

Earlier consultation on the Plymouth Plan (Jan 2015) was underpinned by evidence of housing need of 22,766 homes during the plan period (2011-2031). In the interim sustainability appraisal the following reasonable alternatives were appraised:

1. Pursue the Vision’s growth objective, concentrating all housing and employment growth (with the exception of Sherford, which is an existing commitment) within the city boundary. This would also exclude the Langage employment land, which is important to provide land for distribution uses which cannot be provided within the city.
2. Pursue the Vision’s growth objective, and the objective of sustainable linked neighbourhoods, recognising that growth should not be constrained by the city’s administrative boundary and that the Principal Urban Area (PUA) offers additional potential for sustainable development of housing and employment land.

(These alternatives were assessed in the context of a housing need of 22,766)

At the earlier stage for the West Devon Our Plan (Reg 19), various options for the distribution of development were consulted on during the December 2014 consultation and these were assessed through the SA process (see WD SA 2014 Appendix III).

The move to a Joint Local Plan led to the latest 2017 Integrated Assessment and the options are considered in the context of the JLP and its evidence base.

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<i>SPT3: Affordable housing provision</i>	Option 1. Do not include a policy	X	Option 2.	✓	NPPF requires that the JLP provide policy for the scale of provision of affordable housing and therefore Option 1 is not a reasonable alternative. The housing topic paper (which is informed by the evidence about the need for affordable housing in SHMA Part 2 – February 2017) provides the evidence to justify the policy area targets for affordable housing.
	Option 3 – Housing provision targets higher than option 2	X			Targets higher than Option 2 are not justified because there is no evidence that they could be delivered. This option would not be realistic and is therefore not a reasonable alternative
	Option 4 – Housing provision targets lower than option 2	X			Targets lower than Option 2 would not align with the strategic objectives towards affordable housing and mixed communities. Whilst it would be deliverable, it is not meeting local need and would fail to deliver key objectives, and therefore is not a reasonable alternative
	Option 3 – Housing provision target for the Thriving Towns and Villages higher than option 2	X			Target for the Thriving Towns and Villages Policy Area higher than Option 2 is not justified because there is no evidence that this could be delivered. This option would not be realistic and is therefore not a reasonable alternative
SPT4 Provision for employment floorspace	Option 1. Do not include a policy	X	Option 2.	✓	The JLP must plan for and identify the scale of employment provision for the plan period if the JLP is to be consistent with NPPF and to be found sound (and this provides the context for SPT6, PLY38 (et al), DEV14, DEV15, DEV19 policies) Option 2 provides necessary, locally specific policy, informed by robust assessment of need <i>Note :The analysis of options for the distribution of development is set out in the context of housing for SPT3 It is also relevant to Policy SPT4, TTV1 and TTV2, but is not repeated in this part of this table relating to SPT4</i>
SPT5 Provision for retail development	Option 1. Do not include a policy	X	Option 2.	✓	The JLP must plan for and identify the scale of retail provision for the plan period if the JLP is to be consistent with NPPF and to be found sound (and this provides the context for SPT4, employment site allocations, DEV16, DEV17 and DEV18 policies) Option 2 provides necessary, locally specific policy, informed by robust assessment of need
SPT6 Spatial provision of retail and main town centre uses	Option 1. Do not include a policy and rely on NPPF	X	Option 2.	✓	Whilst NPPF may provide some guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey the appropriate policy approach regarding a sequential hierarchy of centres which provides a centres-first approach to retail and other town centre uses
SPT7 Working with neighbouring areas	Option 1. Do not include a policy and rely on NPPF and legislation	X	Option 2.	✓	Whilst legislation on Duty to Cooperate and NPPF policy regarding effective cooperation will provide some guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey the appropriate policy approach for working with neighbouring areas regarding strategic cross boundary issues.
SPT8 Strategic connectivity	Option 1. Do not include a policy and rely	X	Option 2.	✓	The JLP must incorporate policy for strategic connectivity to the wider region (eg to support the Strategic Economic Plan for the Heart of the South West); if the JLP is to be

	on NPPF, and Government Transport Policy				consistent with NPPF and to be found sound and complemented by Policy SPT7 – Working with Neighbouring Areas; SPT9 and SPT10)
SPT9 Strategic principles for transport planning and strategy	Option 1. Do not include a policy and rely on NPPF	X	Option 2.	✓	The JLP must incorporate policy for a strategic approach to transport if the JLP is to be consistent with NPPF and to be found sound (particularly regarding delivery of development ie ensure that development takes place in the most sustainable, efficient locations in relation to supporting sustainable transport choices, and delivers balanced growth that minimises the need to travel
SPT10 Balanced transport strategy for growth and healthy and sustainable communities	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT9, SPT12, infrastructure policies, sites allocations, and NPPF policies may provide some guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey the locally appropriate policy towards a balanced transport strategy for the plan area
SPT11 Strategic approach to the natural environment	Option 1. Do not include a policy and rely on NPPF	X	Option 2.	✓	Whilst NPPF policies and legislation may provide guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey the appropriate policy approach towards the natural environment, which contributes to the special and unique qualities of the Plan area
SPT12 Strategic infrastructure measures to deliver the spatial strategy	Option 1.	X	Option 2.	✓	Whilst NPPF policies and legislation may provide guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey an effective focus on the key strategic interventions needed to be delivered over the plan period in order to realise the spatial strategy
SPT13 European Protected Sites – mitigation of recreational impacts from development	Option 1. Do not include a policy and rely on NPPF	X	Option 2.	✓	Whilst NPPF policies and legislation may provide guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey the appropriate policy approach towards mitigating the recreational impacts of new development on European Sites. Strategic growth would be prevented if required mitigation measures were not delivered

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<b>PLYMOUTH POLICY AREA</b>	<b>For Policies PLY1 to PL5 (inclusive) Option 1. Do not include a policy in the Plymouth Strategy and rely on SPT policies and NPPF</b>		<b>For Policies PLY1 to PLY5 (inclusive) Option 2 Include policy as set out in the JLP Document</b>		<b>For Policies PLY1 to PLY5 (inclusive) :</b> <ul style="list-style-type: none"> <li>• <b>Reasons for selecting Option 2 is as set out in Appendix IV of this Integrated Assessment</b></li> <li>• <b>Reasons for rejecting all other options are set out below for each policy</b></li> <li>• <b>Note: Failure to fully convey policy would not be consistent with the last sentence of NPPF</b></li> </ul>
PLY1 Enhancing Plymouth's strategic role	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional guidance would fail to fully convey Plymouth's strategic role
PLY2 Unlocking Plymouth's regional growth potential	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional Plymouth specific guidance would fail to fully convey the key growth opportunities
PLY3 Utilising Plymouth's regional economic assets	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional Plymouth specific guidance would fail to fully convey the regional economic agenda for the City
PLY4 Protecting and strengthening Devonport Naval Base and Dockyard's strategic role	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance and protection for HM Naval Base Devonport and the Dockyard, it is considered that the absence of additional Plymouth specific guidance would fail to fully convey policy towards their safeguarding and strengthening, and towards MoD land that is surplus to requirements
PLY5 Safeguarding Plymouth's mineral resources	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance it is considered that the absence of additional specific guidance would fail to fully convey the strategic framework for the use and extraction of minerals resources within the Plymouth city boundary
	<b>For Policies PLY6 to PL61 (inclusive) Option 1. Do not include a policy in the Plymouth Strategy and rely on SPT policies, PLY policies, and NPPF</b>		<b>For Policies PLY6 to PLY61 (inclusive) Option 2 Include policy as set out in the JLP Document</b>		<b>For Policies PLY6 to PLY61 (inclusive) :</b> <ul style="list-style-type: none"> <li>• <b>Reasons for selecting Option 2 is as set out in Appendix IV of this Integrated Assessment</b></li> <li>• <b>Reasons for rejecting all other options is set out below for each policy</b></li> <li>• <b>Note: Failure to fully convey policy would not be consistent with the last sentence of NPPF</b></li> </ul>
PLY6 Improving	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY4, and NPPF policies may provide a certain level of guidance

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Plymouth's city centre					it is considered that the absence of additional specific guidance would fail to fully convey policy towards improving Plymouth City Centre,
PLY7 Colin Campbell Court	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY8 Land at Royal Parade (between Armada Way and Old Town Street)	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY9 Mayflower Street East, City Centre	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY10 Cornwall Street East, City Centre	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY11 Cornwall Street West, City Centre	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY12 New George Street West, City Centre	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY13 Royal Assurance site, Armada Way, City Centre	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY14 Land at 19 The Crescent, Derry's Cross, City Centre	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY15 Civic Centre and Council House site	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY16 Railway station	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY17 Plymouth University and Plymouth College of Art	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy
PLY18 Plymouth History Centre and	Option 1.	X	Option 2.	✓	As for PLY6; Option 2 provides necessary, locally specific policy

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land at Tavistock Place / Chapel Street					
PLY19 Central Park - Strategic Green Space Site	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT5, PLY1-PLY4, and NPPF policies may provide a certain level of guidance it is considered that the absence of additional specific guidance would fail to fully convey policy towards Central Park,
PLY20 Managing and enhancing Plymouth's waterfront	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY4, and NPPF policies may provide a certain level of guidance it is considered that additional specific guidance would fail to fully convey policy towards Plymouth's waterfront,
PLY21 Supporting the visitor economy	Option 1.	X	Option 2.	✓	As for PLY6 and PLY20; Option 2 provides necessary, locally specific policy
PLY22 Cultural quarters.	Option 1.	X	Option 2.	✓	As for PLY6 and PLY20; Option 2 provides necessary, locally specific policy
PLY23 Plymouth Fruit Sales site, Sutton Road, Sutton Harbour	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY24 Sutton Road west, Sutton Harbour	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY25 Sugar House, Sutton Harbour	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY26 Sutton Harbour Fish Quay	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY27 Register office, Lockyer Street, The Hoe	Option 1.	X	Option 2.	✓	As for PLY6 and PLY20; Option 2 provides necessary, locally specific policy
PLY28 Land north of Cliff Road, The Hoe	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY29 Millbay waterfront	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY30 Bath Street west	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY31 Bath Street east	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY32 Stonehouse Barracks	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY33 Oceansgate	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY34 Union Street	Option 1.	X	Option 2.	✓	As for PLY6 and PLY20;

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
					Option 2 provides necessary, locally specific policy
PLY35 Drakes Island	Option 1.	X	Option 2.	✓	As for PLY20; Option 2 provides necessary, locally specific policy
PLY36 Other site allocations in the City Centre and Waterfront Growth Area	Option 1.	X	Option 2.	✓	As for PLY6 and PLY20; Option 2 provides necessary, locally specific policy
PLY37 Strategic infrastructure measures for the City Centre and Waterfront Growth Area.	Option 1.	X	Option 2.	✓	As for PLY6 and PLY20; and because lack of clarity about the priority infrastructure interventions would undermine the delivery of growth in the City Centre and the Waterfront Growth Area Option 2 provides necessary, locally specific policy
PLY38 Derriford commercial centre	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-10, PLY1-PLY4, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the overall role of and framework for the delivery of the new commercial and district centre at Derriford. Option 2 provides necessary, locally specific policy
PLY39 Glacis Park, Derriford	Option 1.	X	Option 2.	✓	As for PLY38; Option 2 provides necessary, locally specific policy
PLY40 Seaton Neighbourhood	Option 1.	X	Option 2.	✓	As for PLY38; Option 2 provides necessary, locally specific policy
PLY41 Derriford Community Park Strategic Greenspace	Option 1.	X	Option 2.	✓	As for PLY38; SPT11 may also provide a level of guidance. Option 2 provides necessary, locally specific policy
PLY42 Plymouth airport	Option 1.	X	Option 2.	✓	Whilst SPT8, SPT1 to SPT6, PLY1-PLY4, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the airport. Option 2 provides necessary, locally specific policy – and complements SPT8 which safeguards the site for general aviation uses until the first review of the JLP. Option 2 is one of three reasonable alternatives for the development of the airport site which was considered in the evidence base report “Plymouth Airport Safeguarding – Consideration of Alternatives” ARUP Nov 2016. Whilst Options 3 and 4 have merit, it is the value of having an airport in Plymouth that is the factor which outweighs the benefits inherent in the other options, and why the Councils selected Option 2.
	Option 3. A new neighbourhood.	X			Option 3 for a new neighbourhood is a residential led option with a range of other uses. This is one of three reasonable alternatives for the development of the airport site which was considered in the evidence base report “Plymouth Airport Safeguarding –

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
					Consideration of Alternatives” ARUP (November 2016). The option is rejected because the approach to safeguard the site for aviation uses offers the city and the region an opportunity to deliver future aviation services, improving strategic connectivity and positively planning for infrastructure. While the options for residential and employment led proposals would contribute positively to the overall vision and a number of the plan objectives, these options would result in a permanent land use change, removing any prospect of air travel returning to Plymouth.
	Option 4. A Science or Business Park	X			Option 4 is for a science park or business park. It is a commercial led option. This is one of three reasonable alternatives for the development of the airport site which was considered in the evidence base report “Plymouth Airport Safeguarding – Consideration of Alternatives” ARUP Nov 2016. The option is rejected because the approach to safeguard the site for aviation uses offers the city and the region an opportunity to deliver future aviation services, improving strategic connectivity and positively planning for infrastructure. While the options for residential and employment led proposals would contribute positively to the overall vision and a number of the plan objectives, these options would result in a permanent land use change, removing any prospect of air travel returning to Plymouth.
PLY43 University of St Mark and St John	Option 1.	X	Option 2.	✓	As for PLY38; Option 2 provides necessary, locally specific policy
PLY44 Woolwell sustainable urban extension and community park	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-10, SPT11, PLY1-PLY4, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards strategic growth to the north of the city delivered through an urban extension at Woolwell. Option 2 provides necessary, locally specific policy
PLY45 Plym Valley Strategic Greenspace	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT5, SPT11, PLY1-PLY4, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the Plym Valley strategic greenspace Option 2 provides necessary, locally specific policy
PLY46 Other sites allocations in the Derriford and Northern Corridor Growth Area	Option 1.	X	Option 2.	✓	As for PLY38; Option 2 provides necessary, locally specific policy
PLY47 Strategic infrastructure measures for the Derriford and Northern Corridor Growth Area	Option 1.	X	Option 2.	✓	As for PLY38 and because lack of clarity about the priority infrastructure interventions would undermine the delivery of growth in the Derriford area and the north of the city; Option 2 provides necessary, locally specific policy
PLY48 Sherford new	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY6, and NPPF policies may provide a certain level of

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
community					guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards strategic growth to the east of the city (in the Eastern Corridor Growth Area) delivered through an urban extension at Sherford Option 2 provides necessary, locally specific policy
PLY49 Sherford Community Park Strategic Greenspace	Option 1.	X	Option 2.	✓	As for PLY48 - Whilst SPT1 to SPT4, PLY1-PLY5, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the Sherford Community Park strategic greenspace Option 2 provides necessary, locally specific policy.
PLY50 Saltram Meadow, Plymstock	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT4, PLY1-PLY5, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards focussing growth in Plymstock at Saltram Meadow (in the Eastern Corridor Growth Area), Option 2 provides necessary, locally specific policy
PLY51 Langage	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY5, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards strategic economic growth at Langage (in the Eastern Corridor Growth Area), Option 2 provides necessary, locally specific policy
PLY52 Land at West Park Hill, Newnham	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY4, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards growth to the east of the city (in the Eastern Corridor Growth Area) delivered through an urban extension on land at West Park Hill, and not be consistent with the last sentence of NPPF para 154 Option 2 provides necessary, locally specific policy
PLY53 Former China Clay dryer complex, Coypool	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards growth at Coypool, (in the Eastern Corridor Growth Area) Option 2 provides necessary, locally specific policy
PLY54 Saltram Countryside Park Strategic Greenspace	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards regionally significant green infrastructure and its integration with the wider area to support delivery of the Eastern Corridor Growth Area. Option 2 provides necessary, locally specific policy
PLY55 Hazeldene Quarry Minerals Safeguarding Area and buffer zone	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, PLY5, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the winning and working of minerals, the restoration and aftercare, and the safeguarding of mineral resource at Hazeldene Quarry;
PLY56 Other sites	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT6, PLY1-PLY5, and NPPF policies may provide a certain level of guidance, it

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
allocations in the Eastern Corridor Growth Area					is considered that the absence of additional specific guidance would fail to fully convey policy towards other site allocations in the Eastern Corridor Growth Area. Option 2 provides necessary, locally specific policy
PLY57 Strategic infrastructure measures for the Eastern Corridor Growth Area.	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT6, PL1-PLY5, PLY48-PLY56 and NPPF may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards strategic Infrastructure in the Eastern Corridor growth area, and because lack of clarity about the priority infrastructure interventions would undermine the delivery of growth in this growth area east of the city. Option 2 provides necessary, locally specific policy
PLY58 Site allocations in the south of Plymouth	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY4, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards development allocations in the south of Plymouth Option 2 provides necessary, locally specific policy
PLY59 Site allocations in the north of Plymouth	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY4, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards development allocations in the south of Plymouth Option 2 provides necessary, locally specific policy
PLY60 Site allocations in Plympton and Plymstock	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, PLY1-PLY5, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards development allocations in Plympton and Plymstock Option 2 provides necessary, locally specific policy
PLY61 Strategic infrastructure measures.	Option 1.	X	Option 2.	✓	Whilst SPT 8-10, and PLY37, PLY47, PLY57 and NPPF policies may provide a certain level of guidance, it is considered that absence of additional specific guidance would fail to fully convey policy towards strategic Infrastructure in the remainder of the Policy Area, and because lack of clarity about the priority infrastructure interventions would undermine the delivery of sustainable growth in Plymouth; Option 2 provides necessary, locally specific policy.
<b>THRIVING TOWNS AND VILLAGES POLICY AREA</b>	<b>Option 1. Do not include a policy</b>		<b>For Policies TTV1 to TTV 32 (inclusive): Option 2.</b>		<b>For Policies TTV1 to TTV32 (inclusive):</b> <ul style="list-style-type: none"> <li>• <b>Reasons for selecting Option 2 are as set out in Appendix IV of this Integrated Assessment</b></li> <li>• <b>Reasons for rejecting all other options are set out below for each policy</b></li> </ul>

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
			<b>Include policy as set out in the JLP Document</b>		<ul style="list-style-type: none"> <li><b>Note: Failure to fully convey policy would not be consistent with the last sentence of NPPF paragraph 154</b></li> </ul>
TTV1 Prioritising growth through a hierarchy of sustainable settlements	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional guidance would fail to fully convey the approach towards prioritising growth in the Thriving Towns and Villages policy area
TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area	Option 1.	X	Option 2.	✓	Whilst SPT and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional guidance would fail to fully convey the approach towards prioritising growth in the Thriving Towns and Villages policy area – lack of clarity would undermine the delivery of sustainable development
					<p><i>Note: The analysis of options for the distribution of development is set out in the context of housing for SPT3.</i></p> <p><i>The strategic level analysis of options for the distribution of development is set out in the context of housing for SPT3. For each of the main towns and for each of the smaller towns and key villages the SHELAA process provides the basis for identifying suitable sites for housing. The SHELAA is available as a separate document.</i></p> <p><i>Sites were put forward to the Council through a call for sites and subsequently, in July 2016, through the Regulation 18 consultation. The merits of each individual site have, therefore, been considered against sustainability criteria, as set out in the SHELAA. The cumulative impact of sites at individual settlements has been considered through the Regulation 18 consultation and in comparison with the findings of the various evidence documents. This has informed the individual policies (strategic infrastructure and allocations) that are set out in the JLP (TTV4 to TTV29) in terms of the criteria that are identified in the individual policy. The detail of each policy is also informed by the SHELAA assessment for each site, notably in terms of the quantum and form of development that is proposed.</i></p>
TTV3 Strategic infrastructure measures for the Main Towns	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT8- SPT11, and NPPF policies may provide a certain level of guidance, it is considered that absence of additional specific guidance would fail to fully convey policy towards strategic Infrastructure in the Main towns in the Policy Area, and because lack of clarity about the priority infrastructure interventions would undermine the delivery of sustainable growth in the Main Towns; Option 2 provides necessary, locally specific policy.
TTV4 Spatial	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
priorities for development in Dartmouth					of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in Dartmouth
TTV5 Land at Cotton	Option 1.	X	Option 2.	✓	As for TTV4 Option 2 provides necessary, locally specific policy
TTV6 Noss on Dart	Option 1.	X	Option 2.	✓	As for TTV4 Option 2 provides necessary, locally specific policy
TTV7 Spatial priorities for development in Ivybridge	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in Ivybridge
TTV8 East of Ivybridge	Option 1.	X	Option 2.	✓	As for TTV7 Option 2 provides necessary, locally specific policy
TTV9 Land at Filham	Option 1.	X	Option 2.	✓	As for TTV7 Option 2 provides necessary, locally specific policy
TTV10 Land at Stibb Lane	Option 1.	X	Option 2.	✓	As for TTV7 Option 2 provides necessary, locally specific policy
TTV11 Other sites allocations at Ivybridge	Option 1.	X	Option 2.	✓	As for TTV7 Option 2 provides necessary, locally specific policy
TTV12 Spatial priorities for development in Kingsbridge	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in Kingsbridge
TTV13 The Quayside	Option 1.	X	Option 2.	✓	As for TTV12 Option 2 provides necessary, locally specific policy
TTV14 West of Belle Hill	Option 1.	X	Option 2.	✓	As for TTV12 Option 2 provides necessary, locally specific policy
TTV15 Other sites allocations at Kingsbridge	Option 1.	X	Option 2.	✓	As for TTV12 Option 2 provides necessary, locally specific policy
<i>Okehampton</i>					At the earlier stage for the West Devon Our Plan (Reg 19), SA/SEA was carried out in Okehampton where employment allocations were being made
TTV16 Spatial priorities for development in Okehampton.	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in Okehampton;
TTV17 Land at Exeter Road,	Option 1.	X	Option 2.	✓	As for TTV16 Option 2 provides necessary, locally specific policy

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
Okehampton					
TTV18 East of Okehampton	Option 1.	X	Option 2.	✓	As for TTV16 Option 2 provides necessary, locally specific policy
TTV19 Land at Stockley	Option 1.	X	Option 2.	✓	As for TTV16 Option 2 provides necessary, locally specific policy
Tavistock					<i>At the earlier stage for the West Devon Our Plan (Reg 19), SA/SEA was carried out in Tavistock where site specific proposals were being made for residential and employment development</i>
TTV20 Spatial priorities for development in Tavistock.	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in Tavistock
TTV21 Callington Road, Tavistock	Option 1.	X	Option 2.	✓	As for TTV20 Option 2 provides necessary, locally specific policy
TTV22 Plymouth Road, Tavistock	Option 1.	X	Option 2.	✓	As for TTV20 Option 2 provides necessary, locally specific policy
TTV23 Pixon Lane Employment Area, Tavistock	Option 1.	X	Option 2.	✓	As for TTV20 Option 2 provides necessary, locally specific policy
TTV24 Other sites allocations in Tavistock	Option 1.	X	Option 2.	✓	As for TTV20 Option 2 provides necessary, locally specific policy
TTV25 Spatial priorities for development in Totnes	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in Tavistock
TTV26 Land at KEVICC	Option 1.	X	Option 2.	✓	As for TTV25 Option 2 provides necessary, locally specific policy
TTV27 Land at Baltic Wharf	Option 1.	X	Option 2.	✓	As for TTV25 Option 2 provides necessary, locally specific policy
TTV28 Other sites allocations in the Totnes	Option 1.	X	Option 2.	✓	As for TTV25 Option 2 provides necessary, locally specific policy
					<i>Note At the earlier stage for the West Devon Our Plan (Reg 19), SA/SEA was carried out where site specific proposals in Bere Alston, Hatherleigh, Lifton, North Tawton and Buckland Monachorum where employment allocations were being made</i>
TTV29 Site allocations in the Smaller Towns and Key Villages	Option 1.	X	Option 2.	✓	Whilst SPT1 to SPT6, SPT8-11, TTV1-TTV2 and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the priorities for development in the smaller towns and key villages; and not be consistent with the last sentence of NPPF para 154

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
TTV30 Empowering local residents to create strong and sustainable communities	Option 1.	X	Option 2.	✓	Whilst SPT1- SPT2, TTV-TTV2, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the positive approach that enables development to come forward in Sustainable Villages, including the mechanism of neighbourhood plans determining which sites to bring forward for development. Not including this policy in the plan would make it necessary for the Councils to identify and allocate sites through the JLP in order that sufficient development is identified.
TTV31 Development in the Countryside	Option 1.	X	Option 2.	✓	A policy approach which relies solely on SPT1-SPT2 and NPPF policies would allow for some limited development in the countryside. However, there would not be the same level of certainty with regards to what development would be allowed in the countryside.
TTV32 Residential extensions and replacement dwellings in the countryside	Option 1.	X	Option 2.	✓	A policy approach which relied solely on SPT1-2 and NPPF policies would allow for some limited residential development in the countryside. However, there would not be the same level of certainty with regards to what development would be allowed in the countryside. Inadequate policy guidance would be given on dwelling extensions and replacement dwellings in the countryside
	<b>For Policies DEVI to DEV 32 (inclusive): Option 1. Do not include a policy and rely on SPT and NPPF policies</b>		<b>For Policies DEVI to DEV32 (inclusive): Option 2. Include policy as set out in the JLP Document</b>	✓	<b>For Policies DEVI to DEV 32 (inclusive) :</b> <ul style="list-style-type: none"> <li>• <b>Option 2 is considered to be necessary and locally appropriate, and provides certainty and clarity and builds on the principles and presumption in favour of sustainable development as set out in the NPPF.</b></li> <li>• <b>Reasons for rejecting Option 1 and other options are set out below for each policy.</b></li> <li>• <b>Failure to fully convey any policy would not be consistent with the last sentence of NPPF para 154.</b></li> </ul>
DEVI Protecting amenity and the environment	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT9-SPT10, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards ensuring that there is enough land available for new employment development to accommodate the growth in jobs
DEV2 Air, water, soil, noise and land	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, DEVI and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting people and the environment from pollution
DEV3 Sport and recreation	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT3, SPT11, infrastructure policies, site allocations, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards new/enhanced sports facilities or resisting loss.

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
DEV4 Playing pitches	Option 1.	X	Option 2.	✓	As for DEV3 , but focused on protecting and improving the stock and capacity of playing pitch facilities and improving the quality of existing playing pitches and ancillary facilities
DEV5 Community food growing and allotments	Option 1.	X	Option 2.	✓	Whilst SPT2, infrastructure policies, site allocations, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards allotments/community food growing space (see also SPT2 and local standards in Fig 3.2)
DEV6 Hot food take aways in Plymouth	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, and PLY may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards hot food takeaways that would complement other policies towards fostering healthy communities such as DEV3, DEV4, DEV20 and Dev26, and SPT10
DEV7 Meeting local housing need in the Plymouth Policy Area	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT3, site allocations, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards meeting local housing need in the Plymouth policy area, focussed on housing choice, housing mix, and creating sustainable, inclusive and mixed communities
	Option 3 (higher % of the total being affordable)	X			Option 3 is rejected because viability evidence indicates that were the percentage of the total housing development to be higher than 30% in the Plymouth Policy Area then funding available through planning obligations or CIL contributions towards infrastructure would be reduced, which could undermine the ability to deliver the development
DEV8 Meeting local housing need in the Thriving Towns and Villages Policy Area	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT3, TTV1-TTV2, site allocations, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards meeting local housing need in the Thriving Towns and Villages policy area, focussed on housing choice, housing mix, and creating sustainable, inclusive and mixed communities
	Option 3 (higher % of the total being affordable)	X			Option 3 is rejected because viability evidence indicates that were the percentage of the total housing development to be higher than 30% in the Thriving Towns and Villages Policy Area then funding available through planning obligations towards infrastructure would be reduced, which could undermine the ability to deliver the development. Text has been added to the policy that seeks to maximise the delivery of Affordable Housing through other mechanisms where viability allows. This approach is based on the long standing 'exceptions' policy that has been applied to rural areas and the long standing Village Housing Initiative. In addition, the policy seeks to secure Affordable Housing contributions from individual dwellings in high value areas.
DEV9 Accessible housing	Option 1.	X	Option 2.	✓	As for DEV7 and DEV8 Option 2 provides necessary, locally specific policy
DEV10 Delivering high quality housing	Option 1.	X	Option 2.	✓	As for DEV7 and DEV8 Option 2 provides necessary, locally specific policy
DEV11 Houses in Multiple Occupation	Option 1.	X	Option 2.	✓	As for DEV7 and DEV8 Option 2 provides necessary, locally specific policy

Policy	Option Considered	Decision Taken	Option Considered	Decision Taken	Summary of reasoning (Note: this column reports the reasons for rejecting options; Appendix X provides the reasons for selection the option that is the policy in the JLP)
in the Plymouth Article 4 Direction Area					
DEV12 Purpose built student accommodation in the Plymouth Policy Area	Option 1.	X	Option 2.	✓	As for DEV7 and DEV8 Option 2 provides necessary, locally specific policy
DEV13 Consideration of traveler sites	Option 1.	X	Option 2.	✓	As for DEV7 and DEV8 Option 2 provides necessary, locally specific policy
DEV14 Maintaining a flexible mix of employment sites	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT4, PLY1-PLY2, TTV1-TTV2 and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards ensuring that there is enough land available for new employment development to accommodate the growth in jobs
DEV15 Supporting the rural economy	Option 1.	X	Option 2.	✓	As for DEV14 – and mindful of SPT4, SPT11, TTV1 and TTV2 is considered that the absence of additional specific guidance would fail to fully convey policy towards supporting economic growth and diversification in the Thriving Towns and Villages Policy Area
DEV16 Providing retail and town centre uses in appropriate locations	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT5-SPT6, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards promoting competitive town centres
DEV17 Promoting competitive town centres	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT5-SPT6, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards retail and town centre uses;
DEV18 Protecting local shops and services	Option 1.	X	Option 2.	✓	As for DEV16 and Dev17; it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting local shops and services Option 2 provides necessary, locally specific policy
DEV19 Provisions for local employment and skills	Option 1.	X	Option 2.	✓	As for SPT4, and to support the delivery of sustainable development in the plan area
DEV20 Place shaping and the quality of the built environment	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, site allocations and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards ensuring that all development has regard to key design principles for a high quality places in the plan area.
DEV21 Conserving the historic environment	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards conserving and enhancing the historic environment
DEV22 Development	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, and NPPF policies may provide a certain level of guidance and

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affecting the historic environment					protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards new development and the need to conserve or enhance the historic environment and contribute to local distinctiveness,
DEV23 Cornwall and West Devon Mining Landscape World Heritage Site	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, and NPPF policies may provide a certain level of guidance and protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards the World Heritage Site
DEV24 Landscape character	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11 and NPPF policies, and legislation may provide a certain level of protection for local landscape features, it is considered that the absence of additional specific guidance would fail to fully convey policy towards conserving and enhancing landscape character
DEV25 Undeveloped coast	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, TTV1-TTV2 and NPPF policies may provide a certain level of protection for the undeveloped coast, it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting the undeveloped coast from development that does not contribute positively to its character
DEV26 Strategic Landscape Areas (Plymouth Policy Area)	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, and NPPF policies may provide a certain level of protection for strategic landscape features, it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting the strategic landscape areas in the Policy Area from development that is not appropriate to these sensitive locations
DEV27 Nationally protected landscapes	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11 and NPPF policies as well as legislation may provide a certain level of protection for nationally protected landscape features, it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting nationally protected landscapes and their settings from development that is not appropriate to the statutory purposes of these nationally significant landscape areas
DEV28 Protecting and enhancing biodiversity and geological conservation	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11 and NPPF policies as well as legislation may provide a certain level of protection, it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting and enhancing biodiversity and geological interests from development, consistent with the hierarchy of protected sites; proportionate biodiversity net gain, and avoiding/mitigating impacts
DEV29 Green and play spaces (including Strategic Green Spaces, Local Green Spaces and undesignated green spaces)	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards protecting and supporting a network of green spaces (strategic and local).
DEV30 Trees, woodlands and hedgerows	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards avoid loss or deterioration through development of trees, woodlands and

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					hedgerows, and mitigating impacts
DEV31 Specific provisions relating to transport	Option 1.	X	Option 2.	✓	Whilst SPT8-10, SPT12, and infrastructure and site allocation policies in the JLP, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards development contributing positively towards a high quality, effective and safe transport system
DEV32 Meeting the community infrastructure needs of new homes	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT8-SPT12, PLY1-PLY2, TTV1-TTV2, and infrastructure and site allocation policies in the JLP, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards major housing development contributing positively towards delivery of sustainable communities with an appropriate range of community infrastructure
DEV33 Waste management	Option 1.	X	Option 2.	✓	NPPF policies may provide a certain level of guidance on waste management, and SPT7 provides guidance on working with neighbouring local authorities on strategic cross-boundary issues such as waste, and PLY5 provides policy towards use of recycled an secondary aggregates (eg construction and demolition waste) plus site allocations with proposals for waste management uses. However, it is considered that the absence of additional specific guidance would fail to fully convey policy towards waste management facilities in Plymouth City, and wider development related, waste management aspects.
DEV34 Delivering low carbon development	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, site allocations, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards delivering low carbon development (complementing DEV35 and 36)
DEV35 Renewable and low carbon energy (including heat)	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, site allocations, and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards delivering renewable and low carbon energy development (complementing DEV34 and DEV36)
DEV36 Community energy	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, TTV1 and TTV2, Site allocations and NPPF policies may provide a certain level of guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards fostering community energy development consistent with carbon reduction objectives (complementing DEV34 and DEV35)
DEV37 Managing flood risk and Water Quality Impacts	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, TTV1 and TTV2, Site allocations and NPPF policies may provide a certain level of protection and guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards ensuring that adequate measures are in place to reduce the risk of flooding and to make Plymouth and South West Devon more resilient to the increased risks of flooding arising from climate change
DEV38 Coastal Change Management Areas	Option 1.	X	Option 2.	✓	Whilst SPT1-SPT2, SPT11, TTV1 and TTV2, Site allocations and NPPF policies may provide a certain level of protection and guidance, it is considered that the absence of additional specific guidance would fail to fully convey policy towards avoiding coastal flooding risks to people, property and the historic and natural environment
DELI Approach to development delivery	Option 1.	X	Option 2.	✓	Whilst SPT12, NPPF policies and legislation may provide guidance, it is considered that the absence of additional guidance for the plan area would fail to fully convey an effective focus

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and viability, planning obligations and the Community Infrastructure Levy					on the approach to development delivery and viability, planning obligations and CIL. This is essential, necessary to complement SPT12 on the key strategic interventions and other JLP policies on infrastructure needed to be delivered over the plan period, in order to realise the spatial strategy.