

Appendix I

Plymouth and South West Devon Joint Local Plan

Integrated Assessment: Non-Technical Summary

March 2017

Introduction

- I.1 This is the non-technical summary report of the Integrated Assessment (IA) report for the Plymouth and South West Devon Joint Local Plan pre-submission plan (regulation 19), covering Plymouth City, South Hams and West Devon Councils outside of the Dartmoor National Park. It describes how the Appraisal process was used to assist in planning for the development and use of land as required by planning legislation and Government guidance.

Plymouth and South West Devon Joint Local Plan

- I.2 The Plymouth and South West Devon Joint Local Plan (JLP) sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within the plan area to cover the period up to 2034. It is based on social, economic and environmental objectives, together with other important strategic development needs such as housing employment, retail, leisure and transport as well as mitigating and adapting to the effects of climate change.
- I.3 The Integrated Assessment provides and appraisal of the social, economic and environmental impact of the Joint Local Plan and provides details of:
- Appraisal of the vision and objectives of the Joint Local Plan against the SA Framework;
 - An outline of the approach adopted to the development of the Sustainability Appraisal Framework, drawing on work previously undertaken for the Plymouth Plan, Our Plan West Devon and Our Plan South Hams where this is still relevant, developing the process further to provide a robust framework for site selection and policy development;
 - An assessment of the vision, objectives and the policies of the JLP;
 - An assessment of growth options;
 - An assessment of the process for identifying sites for allocation.
- I.4 The main report is divided into a number of sections:
- **Section 2** provides context on the Joint Local Plan
 - **Section 3** provides more detail on the methodology including the scoping process which has been undertaken.
 - **Section 4** provides a description of the characteristics of the area and how the area might fare without the JLP in place
 - **Section 5** considers the options and alternatives to the proposed approach within the JLP

- **Section 6** sets out the monitoring requirements
- **Section 7** sets out the approach to dealing with equalities and diversity
- **Section 8** sets out the high level conclusions

I.5 The Integrated Assessment is supported by a number of appendices, including this non-technical summary, which are available separately.

- Appendix I: Non-technical summary
- Appendix II: SA compliance with the requirements of the SEA Directive
- Appendix III: Final Scoping Report
- Appendix IV: Scoping Report for Plymouth Plan (September 2014)
- Appendix V: Scoping Report for South Hams Our Plan (July 2014)
- Appendix VI: Scoping Report for West Devon Our Plan (September 2014)
- Appendix VII: Interim SA of Plymouth Plan part one (February 2015)
- Appendix VIII: SA of Our Plan West Devon (February 2015)
- Appendix IX: SA of JLP policy alternatives
- Appendix X: SA of draft distribution strategy (November 2016)
- Appendix XI: SA of site allocation methodology
- Appendix XII: SA of JLP Vision, Objectives and Policies
- Appendix XIII: Equalities Impact Assessment (EqIA)

Integrated Appraisal incorporating Sustainability Appraisal, Strategic Environmental Assessment and Equality Impact Assessment

I.6 Planning legislation requires that the Local Plan is subject to a Sustainability Appraisal (SA). SA is a systematic process designed to evaluate the predicted social, economic and environmental effects of development planning. European and UK legislation require that the Local Plan is also subject to Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Government guidance advises that these two processes should be carried out together and outlines a number of stages of SA work that need to be carried out as the Local Plan is being prepared:

- Stage A: Setting Context and Scope
- Stage B: Preparing and Developing Options
- Stage C: preparing the SA Report
- Stage D: Consulting on the Plan and the SA
- Stage E: Monitoring the Implementation of the Plan

I.7 The Integrated Assessment incorporates the Environmental Report which is required by the SEA legislation. Appendix II identifies which parts of the Integrated Assessment, including the Appendices, comprise the Environmental Report.

I.8 The first stage of preparing the Integrated Assessment is the preparation of the scoping report. The scoping stage involves: identifying the environmental protection objectives from other plans and programmes; characterising the local area; and identifying the key environmental problems. It reviews the baseline information and identifies sustainability issues, challenges and opportunities within the JLP Area. Following the 5 week consultation in 2016, the final scoping report for the Integrated Assessment for the Joint Local Plan has been produced, set out in Appendix III. The earlier scoping reports for the

Plymouth Plan, South Hams Our Plan and West Devon Our Plan are included in Appendices IV, V and VI.

- I.9 Work on sustainability appraisal/strategic environmental assessment commenced in 2014 and includes the earlier, interim sustainability appraisal for the Plymouth Plan, set out in Appendix VII, and the sustainability appraisal of the West Devon Our Plan, set out in Appendix VIII. More recently the distribution strategy sustainability appraisal topic paper was also subject to consultation. The Integrated Assessment (March 2017) is the latest stage in the process.

Sustainability Appraisal/Strategic Environmental Assessment of West Devon Our Plan Scoping Report	September 2014
Sustainability Appraisal/Strategic Environmental Assessment of West Devon Our Plan	February 2015
(draft) Health Impact Assessment of draft West Devon Our Plan	February 2015
Plymouth Plan Sustainability Appraisal Scoping Report	September 2014
The Plymouth Plan 2011 – 2031 (part one) Interim Sustainability Appraisal	Jan 2015
Sustainability Appraisal/Strategic Environmental Assessment of South Hams Our Plan Scoping Report	September 2014
Plymouth and South West Devon Joint Local Plan Integrated Assessment Scoping Report (including Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA))	August 2016
Plymouth and South West Devon Joint Local Plan Draft Distribution Strategy SA Topic Paper	November 2016

Links to other plans, programmes and objectives

- I.10 The purpose of reviewing the policy context of the Local Plan is to identify the relevant objectives and targets of other plans and programmes, so they can be reflected in the sustainability framework. This will ensure that there is no conflict between the Local Plan and other documents, and ensure that any common objectives between the Local Plan and the other documents are utilised.

Equality

- I.11 In addition to the SA/SEA requirement, the appraisal of the JLP has also incorporated health and Equalities Impact Assessment (EIA). The latter enables the councils to demonstrate that they have met their single public sector equality duty when plan-making.

The character of the JLP area

- I.12 The JLP area covers approximately 2,127km² and has a population of 399,914 (ONS 2014) living within the city and a network of market and coastal towns, villages and hamlets. The sea defines some of the limits of the plan area and the Dartmoor National Park sits in the middle of the plan area, making an important contribution to the character of the area.
- I.13 The city is the main regional centre in the JLP area, home to approximately 70% of the population across the plan area. The city provides a number of key services and facilities including Derriford Hospital, the education establishments of Plymouth University, Marjon and Plymouth College of Art and Design

alongside an extensive range of shopping and leisure facilities which meet the needs of the JLP area. The remainder of the population live in West Devon and South Hams, with its towns and villages providing services and facilities to meet the needs of the wider rural population. Combined with the city, this results in a hierarchy of settlements which help serve the whole of the JLP area from the smallest hamlets to those who live in the city.

- I.14 The JLP area is well connected to the rest of the country via the A30 and A38 and onwards from Exeter on the M5. There are also rail links to Cornwall, Exeter and beyond and there are plans within parts of the plan area to improve rail links, such as the reopening of the railway from Tavistock to Bere Alston.
- I.15 There are a number of landscape designations across the JLP area which contributes to its character, including the Dartmoor National Park and South Hams and Tamar Valley Areas of Outstanding Natural Beauty. There are also a number of European protected wildlife sites which are sites of exceptional importance in respect of rare, endangered or vulnerable habitats and species within the European community. Sites of international significance include:
- Blackstone Point SAC
 - Culm Grasslands SAC
 - Dartmoor SAC
 - Lyme Bay and Torbay SAC
 - Plymouth Sound and Tamar Estuaries SAC
 - South Dartmoor Woods SAC
 - South Devon Shore Dock SAC
 - South Hams SA
 - Start Point to Plymouth Sound and Eddystone SAC
- I.16 There are also a range of other important national designations across the plan area including 68 Sites of Special Scientific Interest, 4 National Nature Reserves, 13 Local Nature Reserves and 489 County Wildlife Sites.
- I.17 In addition to the natural environment, the JLP is home to a rich and diverse historic environment which provides important cultural, economic and environmental benefits for the whole plan area. This includes 1137 Scheduled Ancient Monuments, 86 Conservation Areas, 5900 Listed Buildings, 14 Registered Park and Gardens and 2 Protected Wrecks.
- I.18 Plymouth is a regional centre for employment and retailing, where the current focus is on the maritime economy, dockyard, manufacturing and the public sector, which has substantial employers include the University, the Science Park and the Hospital. Opportunities to transform Plymouth's economic growth are opportunities to strengthen the city's strategic role. Within South Hams and West Devon there are low wage rates amongst those who work within the area, yet higher resident wage rates, as well as significant levels of out-commuting to work, high skills levels amongst residents in work and below national average employment levels. This suggests the need to focus on raising productivity and wage levels and not just creating jobs.
- I.19 There are generic issues across the plan area about an ageing population, access to services and facilities, and fuel poverty. The extent of health inequalities, higher unemployment and lower economic activity rates are issues in Plymouth. Isolation, high private car use, and housing affordability together with the smaller rural communities' reliance on Plymouth and the market towns are issues in rural areas. At the same time high net in-migration levels are a reflection of the attractiveness of the rural areas.

Sustainability Framework

I.20 This process allows a sustainability framework to be developed, which comprises a series of sustainability objectives which cover the key social, economic and environmental issues within the plan area. The SA objective headings are as follows:

- Air quality
- Biodiversity and green infrastructure
- Climate change
- Community well-being
- Economy
- Equality and inclusion
- Environmental quality
- Health and well-being
- Historic Environment
- Housing
- Landscape
- Transport
- Waste
- Water

I.21 The framework has been developed with Statutory Consultees as part of the consultation on the Scoping Report in 2016. The Joint Local Plan’s vision, objectives and policies of the plan are assessed against this framework.

Assessment of the JLP

I.22 The assessment of the JLP has systematically appraised each step of the preparation of the JLP using the Framework objectives. Given the iterative nature of the plan preparation process, many of the potential negative effects that were identified earlier had already been identified and suitable mitigation measures identified in the Plan and the assessment which is contained as part of this final report is an assessment of the final policies in the JLP. The appraisal used the following scoring matrix:

Score	Significance
++	Major positive effects to achievement of the IA objective
+	Minor positive effects to achievement of the IA objective
0	No effect (either positive or negative) to achievement of the IA objective
-	Minor negative effect to achievement of the IA objective
--	Major negative effect to achievement of the IA objective
?	Impact on the IA objective is uncertain

I.23 Earlier work has looked at the reasonable alternatives when preparing the plan, the approach to distribution of growth across the plan area and the reasonable policy alternatives. These can be viewed at appendix IX and X.

I.24 The assessment of the vision, objective, policies, reasonable alternatives and the approach to site allocations are available to view at appendix IX – XII.

Monitoring requirements

I.25 To ensure that the JLP delivers its vision and objectives the implementation of its policies will be monitored. This also serves the purpose of measuring how sustainable development is being monitored
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within the JLP area. This will be reported each year through the Authority Monitoring Reports of the LPAs.

Summary and next steps

- 1.26 The integrated appraisal process has considered the strategic environmental and wider sustainability effects that are likely, or that have the potential to occur, as a result of the implementation of the JLP pre-submission document. The integrated assessment process has been undertaken by officers of the Councils who have an in-depth understanding of the JLP area. This has resulted in an iterative process which has evolved through the plan-making stages. The appraisal report focuses on key recommendations and changes. The Plan has been the subject of on-going drafting and refinement and some minor changes have not been documented. The report demonstrates that sustainable development is at the heart of the decision making process, the fact that the assessment of policies does not highlight any significant negative effect that give rise to concern reflects how the SA has helped inform and influence policy development.
- 1.27 The Integrated Assessment scoping process in 2016 included consultation to help ensure that the characteristics and sustainability issues for the JLP area were identified and incorporated into the SA (IA) framework for assessments. This builds on the earlier work of each authority in preparing their own plans alongside previous SA work. Statutory consultees have therefore had the opportunity to engage throughout the process and this formal regulation 19 stage represents the ongoing opportunity to engage and comment.
- 1.28 Where appropriate the process has made recommendations to enhance the positive effects identified and mitigate negative effects. These recommendations have been in addition to the mitigation and enhancement measures contained within the Plan that reflect the evolution of the plan and appraisal recommendations arising from the on-going assessment process.
- 1.29 Wherever possible, plan-making has incorporated the recommendations and suggestions from the SA (IA). Key enhancements for sustainability arising from the SA (IA) include strengthening and clarifying policies with regard to sustainable transport, Green Infrastructure, energy efficiency and renewables, and design requirements for high standards and to address needs of all users. This demonstrates the difference that the SA (IA) has made to the Plan.
- 1.30 The SA (IA) found that the majority of the JLP policies are likely to have significant positive effects, particularly with regard to;
- meeting housing needs with long term positive effects
 - strengthening communities and reducing inequalities
 - prioritising economic growth in the most sustainable settlements:
 - protecting the distinctive landscape and open/green space
 - protecting the distinctive historic environment
 - strong focus on sustainable design, including construction, transport and energy
 - seeking to ensure that infrastructure delivery matches the pace and level of growth
- 1.31 Alongside the positive effects, some negative effects were also identified - largely as a result of the overall cumulative effects of increased housing, employment and associated infrastructure in the plan area. Increased contributions to greenhouse gases are likely, particularly urban extension sites and will arise from transport and also the embodied energy inherent in construction. Potential negative effects

(eg noise, air pollution, congestion, loss of tranquillity and wider health/well-being objectives) may arise from increased road traffic. There are also potential negative effects from significant physical changes to local areas with impacts on biodiversity, landscape/townscape and the historic environment. The process of appraisal has ensured that appropriate mitigation is included in the JLP policies, both site allocations and general development management policies.

- I.32 The significance of these potential negative effects is uncertain and it depends on the local area and the effectiveness of implementing the development management policies. The SA (IA) has identified that the JLP will deal with identified sustainability issues in the area, particularly for communities through the allocation of new (and affordable) housing, improvements to Green Infrastructure and transport links.

Next Steps

- I.33 The IA report is being published alongside the pre-submission draft Joint Local Plan to demonstrate the significant sustainability effects of the draft plan and the alternatives considered in developing the plan.
- I.34 After the close of the consultation on the pre-submission version of the JLP any responses made in connection with the IA will be reviewed and consideration will be given to whether the document requires changes prior to it being submitted to the Inspector for examination.

Can I comment on this IA?

- 8.1 Comments are invited on the IA report for a six week period between **15th March and midnight on 26th April 2017.**
- 8.2 To comment on the Plan and this integrated report, you are recommended to use the on-line consultation portal which can be accessed here
<http://plymouth.consult.limehouse.co.uk/portal/planning/jlp/>
- 8.3 Alternatively, please send your comments to:
- Plymouthplan@plymouth.gov.uk
 - Strategic.planning@swdevon.gov.uk
 - Joint Local Plan Team, Floor 2, Ballard House, West Hoe Road, Plymouth, PL1 3BJ